



Massachusetts Department of Elementary and Secondary Education

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Mitchell D. Chester, Ed.D.
Commissioner

January 5, 2016

Ann Whalen
Senior Advisor to the Secretary
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202

Dear Ms. Whalen:

I am writing in response to your December 21, 2015 letter indicating that Massachusetts's Title I, Part A grant award under the federal Elementary and Secondary Education Act has been placed on "high risk" status as a result of our state Board of Elementary and Secondary Education's decision to allow local school districts the choice of administering one of two assessments in spring 2016 to students enrolled in grades 3 through 8. For the reasons described in this letter, I request that you reconsider and remove the "high risk" designation.

In November 2015, the Massachusetts Board of Elementary and Secondary Education (BESE) reaffirmed our state's long-standing commitment to a single statewide assessment and to using the results of that assessment to inform efforts to improve student achievement. As you know, we adopted a statewide assessment years before it was required by the Elementary and Secondary Education Act, and our high standards and school accountability system often are cited as models for the nation. Recent evidence of our commitment to aiming high includes the fact that in 2015 we participated in the Programme for International Student Assessment (PISA) as a territory independent of the United States as a whole. In 2012, we were one of the first three states (along with Connecticut and Florida) to administer PISA as independent territories, and we were the only one of the three to participate again in 2015.

2015-16 statewide assessments

We conducted a two-year test drive of the Partnership for the Assessment of Readiness for College and Careers (PARCC) assessment in 2014 (as part of the PARCC field test) and 2015 (as part of the first PARCC operational administration), with the expectation that we would select either PARCC or our existing Massachusetts Comprehensive Assessment System (MCAS) for statewide use beginning in the spring of 2016. (We offered districts their choice of MCAS or PARCC in spring 2015.) Our evaluation showed that PARCC represented a substantial advancement over our current MCAS tests. At the same time, we realized that Massachusetts needs to maintain full control of our next-generation test both to ensure alignment to the Commonwealth's standards and to maintain the widespread public support for our high standards and accountability. Therefore, based on my recommendation, the BESE voted to implement a

next-generation MCAS test, using much of the PARCC framework and content but tailored to our state's unique needs.

The BESE recognized that our new statewide test would not be available until spring 2017. The Board's decision to allow our districts to administer either PARCC or MCAS in spring 2016 is in no way a repudiation of our commitment to a high-quality, single state assessment. Its only purpose is to provide a simple, workable transition to the new test.

The option of choosing one of two comparable assessments in spring 2016 applies *solely* to English language arts (ELA) and mathematics tests in grades 3 through 8. Our school districts will continue to administer unitary statewide assessments for science in the elementary and middle grades and for all tested subjects at the high school level. Specifically, this spring, all students enrolled in grades 5 and 8 in Massachusetts public schools will continue to take the same MCAS science, technology, and engineering (STE) tests, and all high school students will continue to take the same MCAS ELA, mathematics, and STE tests.¹

In fact, most grade 3-8 students will be taking the PARCC assessments in spring 2016. As of this date, close to two-thirds of our students in grades 3-8 are committed to taking the PARCC assessments this spring (as compared to 54 percent in spring 2015).

Comparability and use of 2015-16 assessment results

While all students in grades 3-8 will take one of two high-quality assessment instruments in ELA and math this spring, each of those students will continue to be assessed in relation to the same rigorous academic content standards. Massachusetts incorporated the Common Core State Standards into our 2010 ELA and mathematics frameworks. Our 2010 frameworks went beyond the Common Core State Standards by incorporating elements of our prior standards (e.g., author lists in ELA) and augmenting the Common Core with Massachusetts-specific mathematics and ELA content. We have evolved the MCAS since the adoption of the 2010 frameworks to ensure alignment with the 2010 standards.

As a result of Massachusetts educators' engagement in developing our 2010 frameworks and because of widely-adopted implementation efforts over the past five years, Massachusetts has avoided much of the intense controversy that the Common Core has caused in many other states. The standards remain the basis for the PARCC and MCAS assessments and will also undergird the unitary next-generation assessment system we are developing.

Further, while Massachusetts school districts will administer either PARCC or MCAS tests in ELA and mathematics for grades 3-8 this spring, we will provide meaningful and comparable information to stakeholders, including families, about the performance of students, schools, and districts on the grades 3-8 tests. We will use statistical techniques to link this spring's PARCC and MCAS results in grades 3-8, as we did with the results from the PARCC and MCAS tests that our districts administered in grades 3-8 in spring 2015. We will publish those results using comparable metrics — specifically, composite performance index (CPI) scores and student growth percentiles (SGPs) — to provide districts, schools, families, and other stakeholders the ability to compare district and school performance on the same scales regardless of the

¹ High school MCAS ELA and mathematics tests are administered to all students in grade 10. High school STE tests may be taken in either grade 9 or grade 10.

assessment that was administered. The linked results also will be used to generate 2015-16 accountability determinations for all schools and districts and will help guide our identification and support for the state's lowest performing schools and districts.

To further enhance the comparability of 2015-16 results, we are adding PARCC items to the MCAS ELA and mathematics tests that will be administered in grades 3-8 this spring. Doing so will increase the validity of the linked results and allow us to better measure and compare the progress that all schools are making.

In short, we will be employing statistically linked data from MCAS and PARCC administered over two years (2015 and 2016), and the linkage will be enhanced by the addition of 2016 PARCC items to the 2016 MCAS assessment. We have tailored this approach to ensure that we will be providing students, parents, teachers, schools, and districts with school year 2015-16 assessment results that are comparable, regardless of whether students take MCAS or PARCC.

2016-17 statewide assessments

The first administration of Massachusetts's new unitary statewide assessment system — which we have informally dubbed our “next-generation MCAS” — for all tested grades will occur in the 2016-17 school year. All districts and schools will use the unitary system starting in spring 2017.

We have adopted an aggressive timeline to ensure that we meet our commitment to implement a unitary assessment system in spring 2017. We are proceeding to gather input from a broad range of stakeholders on the design of our future assessment system and simultaneously assembling a request for proposals (RFP) that will be used to select a primary vendor to lead development of the new assessment. The next-generation MCAS project timeline anticipates public posting of the RFP by the beginning of March 2016, completion of proposal review and evaluation by mid-May, and final vendor selection by mid-June 2016. Further, the BESE has convened an assessment committee of the Board that is meeting monthly with the Department to ensure Board engagement in, and oversight of, the process and timeline to which we have committed.

Our vision for the next-generation MCAS includes combining PARCC, MCAS, and newly developed items into comprehensive ELA and mathematics tests for grades 3-8 and high school; developing a consistent set of performance standards across all grades, as well as an appropriate sequence of high school tests to gauge readiness for college and careers; and phasing in of full computer-based testing. More details regarding our plans for the next-generation MCAS are contained in the model overview published here: www.doe.mass.edu/mcas/2015-1112ProposedModel.pdf.

Summary

I am confident that our state Board's November 2015 decision to allow districts to select either PARCC or MCAS ELA and mathematics tests for grades 3-8 in spring 2016 is the right one for the Commonwealth and that our systematic path to a new next-generation statewide assessment system will ultimately lead to improved outcomes for our students. Massachusetts is a state that since the passage of our 1993 education reform law has not shied away from high standards, and our 2015-16 assessment plans represent a thoughtful and deliberate step toward raising the bar

further.

We are committed fully to adopting and administering a single assessment system beginning with the 2016-17 school year. Thank you for considering this request for removal of the "high risk" designation on our Title I, Part A grant award. I look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Mitch D. Chester". The signature is fluid and cursive, with a large initial "M" and "C".

Mitchell D. Chester, Ed.D.
Commissioner of Elementary and Secondary Education

c: James Peyser, Massachusetts Secretary of Education
Paul Sagan, Chair, Massachusetts Board of Elementary and Secondary Education