

February 11, 2021

TO: Michigan Department of Education

FROM: Colleen Allen, Ph.D, Autism Alliance of Michigan; Amber Arellano, The Education Trust-Midwest; Deidre Bounds, Ignite Social Media; Ryan Fewins-Bliss, Michigan College Access Network; Mike Jandernoa, 42 North Partners; Jametta Lilly, Detroit Parent Network; Grace Lubwama, Ph.D, YWCA Kalamazoo; Monique Marks, Franklin Wright Settlements; Dave Meador, DTE Energy; Diana Sieger, Grand Rapids Community Foundation; Nicole Wells Stallworth, Board Chair of MacDowell Prep Academy, Alice Thompson, BFDI Educational Services & Detroit Branch NAACP; Adnoris "Bo" Torres & Margaret J. (Peggy) Vander Meulen, Strong Beginnings-Healthy Start, Ken Whipple, Michigan Achieves; Holly Windram, Ph.D, Hope Network Michigan Education Corps.

CC: Hon. Gretchen Whitmer, Governor

Hon. Phil Rosenfelt, Acting Secretary of Education/Miguel Cardona, Secretary of Education

Members of the Michigan State Board of Education

RE: **Public comment on January 25, 2021 request to waive school assessment and accountability for 2020-21 school year**

The COVID-19 pandemic has led to unprecedented disruptions in learning for millions of students, just as it has disrupted so many other areas of life for nearly a year.

However, the impacts of this crisis have not been evenly distributed, despite the incredible efforts of the many educators, parents, community partners and others who stepped up to assist. Some students have received in-person instruction nearly all school year, while others have yet return to their classrooms. Additionally, supports for students, educators and families have varied greatly, as have levels of asynchronous instruction, access to wraparound services and the quality of learning resources in a virtual setting. Emerging national research suggests that the last year of distance learning has exacerbated pre-existing inequities in our education system – a [report](#) by McKinsey & Company estimated the end of in-person instruction last spring may result in Black students falling behind by 10.3 months, Hispanic students by 9.2 months, and low-income students by more than a year. However, we do not know the full impact of the pandemic in Michigan, specifically, and to what extent the pandemic has worsened longstanding gaps in access, opportunity and achievement.

To understand the effects of the COVID-19 crisis and ensure that this pandemic does not undermine the futures of students across the state, we must collect accurate, objective, and comparable data that speaks to the quality of education in this moment, including data from statewide assessments. Without this, state leaders will not be equipped with information about the disparate impact of unfinished learning; nor will they be able to equitably allocate resources, personnel, and services that accelerate learning.

As organizations and individuals committed to educational equity and quality, we are deeply concerned about learning loss and the long-term impact of pandemic-related disparities, particularly for underserved student groups. While assessment results may be imperfect and should not be used for school accountability purposes this year, collecting baseline data is essential to understanding gaps, targeting investments, and achieving our shared goal of meeting the unique learning needs of every student's educational recovery.

As detailed below, we remain concerned about the expansive nature of the waiver request and how the lack of data about student learning will vastly limit what we know and understand about the needs of students. We urge the Department to amend the waiver to maintain summative assessments, as noted below.

I. Maintain state summative assessments, even if adjustments must be made to the way assessments are implemented.

Educational inequities will persist and may worsen regardless of the decision on whether to assess student learning. However, having assessment data provides ability to understand the scope of these gaps and respond to the vast needs

of students, particularly the most underserved. For students preparing to graduate high school, state-provided assessments remain key for postsecondary affordability, even when they are not required for admissions.

Many educators, parents and students appreciate the value of data about student learning during this challenging time. A [recent poll](#) of Michigan parents shows that 47 percent report receiving little or no information about whether their child has experienced learning loss or has fallen behind grade-level expectations as a result of schools being closed due to the pandemic, while the vast majority of all parents expressed concern about their child falling behind academically. While benchmark assessments are now required, their use and quality is not consistent across the state.

We recognize that the manner in which students are assessed should reflect the unusual nature of the school year. As state education leaders across the country have contemplated this challenge, many have indicated they will change how students will be assessed, including in ways that could address the concerns outlined in the department's waiver request. Although these vary by state, they include eliminating field-test items, using adjusted form blueprints, consolidating the testing window or delaying testing windows to maximize classroom instruction. Additionally, recognizing that many students are not attending school in person, some states are providing options for at-home assessments or the use of testing centers.

II. To promote the most successful assessment of student learning possible, MDE should develop a comprehensive administration and communications plan and provide needed supports to schools and districts to implement it

To be successful, the rollout of Spring 2021 assessments must include educators and parents as essential stakeholders. Through robust planning, proactive communications on the logistics, usefulness and relevance for students to participate, and engaging conversations about this important tool for measuring learning, Michigan can address longstanding concerns and misconceptions about Michigan's assessment programs.

III. Suspending the use of summative assessment data for school accountability during the 2020-21 school year is reasonable as long as data is made publicly available to parents and policymakers and results are used to target resources to support Michigan's needed educational recovery

Although the Spring 2021 summative assessments will be a valuable source of information to help shine a light on disparities and collecting baseline information about anticipated declines in overall achievement and widening gaps, we recognize the unprecedented nature of this year means they will not provide a strong comparison to prior year's data.

For these reasons, we recognize the need to temporarily suspend the use of summative assessment data for school-level accountability during the current school year, returning to Michigan's school accountability systems next school year.

IV. Supplement accountability waivers with public reporting so that parents, educators and stakeholders can understand and address the unprecedented disruptions in student learning this school year

Now more than ever, stakeholders -- from students and parents to school leaders and policymakers -- need transparency and honesty around how schools are meeting the incredible challenges of this moment to inform where support must be directed. To ensure that parents, educators and state leaders can understand, identify and address the impact of the pandemic on our students' learning, public reporting must be maintained.

Alternative measures to assess student learning unique to this school year should be collected and publicly reported, disaggregated by subgroup, including daily attendance and engagement; mode of instruction; access to technology; extended learning opportunities; and accessibility of socio-emotional supports.

We recognize that statewide assessments are only one measure of student learning, and assessments alone will not address systemic discrimination and inequity in our education system. Right now -- when students who have historically been underserved are bearing the brunt of the impact from the pandemic -- waiving assessments will only make it harder to identify and address one of the most inequitable school years in history. The data from summative assessments will shine a light on deep inequities and allow us to pave a way forward.