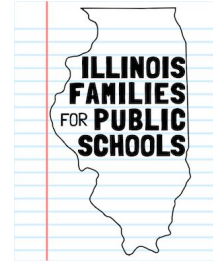


Illinois Families for Public Schools
332 S Michigan Ave
Lower Level Suite i252
Chicago IL 60604



March 18 2021

Illinois State Board of Education
100 N First St
Springfield IL 62777

To State Superintendent Ayala and Board Members:

We appreciate the efforts that the Illinois State Board of Education (ISBE) has made to reduce the burden of standardized testing this year by suspending the SAT diploma requirement and by attempting to secure a full moratorium on 2021 testing from the US Department of Education (USED). Given that USED has said they will not be issuing complete waivers, we urge ISBE to take the following steps with respect to federal and state-mandated assessments:

- (1) ISBE should immediately clarify to all schools and families that current seniors will not have diplomas withheld due to lack of participation in an administration of a state-mandated SAT with essay test. This requirement could have been rescinded earlier this year because it is not in fact a requirement of ESSA, and with the increasing trend of test-optional college admissions in Illinois and nationwide, ISBE should revisit the SAT graduation requirement altogether.
- (2) ISBE needs at long last to rescind its policy on parental opt out of state-mandated testing. The federal government has affirmed since 2015 that states have the right to allow families to opt out of testing and that the federal requirement for states to administer testing does not mean that students are obligated to test. ISBE drafted a letter saying this in 2015 but did not release it.

Parents should be able to send in a simple letter to indicate that their child will not be testing, and students who are too young to refuse, have disabilities that make it unable for them to refuse, etc. shouldn't have the onus of refusal placed on them. Students, parents, teachers, schools and districts should not be punished for families' exercising their right to decide whether their child should participate in testing. States and districts have never lost even a cent of federal funding for low participation rates including in states with consistent massive test refusal. This year more than ever, but *every* year, parents should be able to make this decision on behalf of their families.

(3) Although we applaud the attempt to minimize the burden of the tests on Illinois schools, districts, teachers, and especially students in the waiver request as drafted, we urge further changes. ISBE's waiver request should meet federal accountability requirements under ESSA this year in the least burdensome way for students and schools. Considerations include:

- Reducing the length of the tests;
- Using sampling strategies rather than testing all students;
- Eliminating the test-score components of accountability ratings;
- Cancelling tests that do not provide information that schools and teachers can use this year to improve instruction;
- Allowing families to refuse testing and informing them of their right to do so; and
- Precluding schools and school districts from pressuring students to return to school simply for testing.

(4) We urge a blanket waiver of the ACCESS test this year. The ACCESS test is extremely time consuming to administer and does not provide the kind of immediate information about students' language proficiencies that teachers need to tailor their instruction. Districts and schools typically have effective tools at their disposal to assess students' language proficiencies. Administering ACCESS this year creates an additional and unnecessary burden for schools, teachers, and districts. More importantly, the ACCESS exam robs some of our most vulnerable learners of valuable instructional time for an assessment that will not benefit them.

Furthermore, the COVID-19 pandemic has disproportionately impacted the very communities where emerging English learners and their families reside. Testing those students this spring in person poses safety and logistic questions because many of those same students' families continue to prefer remote learning. We are already hearing reports of schools requiring students to come to school only for ACCESS testing. Delaying the ACCESS tests until the fall will mean that the already considerable cost in time that ACCESS testing poses will be doubled for the 2021-2022 school year—for a student population that will be especially in need of support and interaction from their teachers when they return to buildings. In lieu of ACCESS testing, we encourage ISBE to provide schools with additional support, if requested, for local assessments of students' language proficiencies.

The truth is that we have plenty of data to know which communities have been hit hardest by the pandemic: not only school data, like attendance data and grades, but covid infection and death rates, evictions, unemployment, utility cut offs, food insecurity, and more. The issue is whether we will address the needs of students rather than subjecting them to standardized tests.

We understand the incredible pressures on ISBE to make immediate decisions that will minimize the test burden this year on students and schools. The issues you are

confronting now, however, highlight a wide range of problems with our current assessment system. We urge ISBE to use this experience as an opportunity to do a soup-to-nuts rethinking of how we assess and how we use assessment data in Illinois, so that it provides far more useful and actionable information to Illinois families and Illinois schools.

Thank you for your work on behalf of Illinois school children and families.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Creswell', with a long horizontal flourish extending to the right.

Cassie Creswell
Director
Illinois Families for Public Schools

on behalf of:
Brighton Park Neighborhood Council
Enlace Chicago
Illinois Families for Public Schools
Logan Square Neighborhood Association
National Center for Fair & Open Testing (FairTest)
Parents 4 Teachers
Raise Your Hand for Illinois Public Education
Southwest Organizing Project