



*J. Kenyon Kummings, Superintendent
Wildwood Public Schools
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Wildwood, New Jersey 08260
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Wildwood Public Schools

May 14, 2019

RE: Assessment Testimony Before the Joint Committee on Public Schools

Members of the Joint Committee on the Public Schools,

My name is Kenyon Kummings and I am currently the Superintendent for Wildwood Public Schools (WPS). I was invited here to testify today on the topic of assessment. I have testified twice before this committee (October 2016 and April 2019). Both times I covered topics that were related to assessment, specifically in terms of the disruption it causes to the instructional environment, and the inequitable outcomes realized by our current systems. Our district has a high percentage of economically disadvantaged students and is racially and ethnically diverse. WPS is unique in that we continuously have one of the highest percentages of students living below the poverty line in New Jersey (50%). We have a high special education population (24%) as well as a large number of English Language Learners (ELL) (35% through 8th grade).

All children begin school at different starting points, some know all their letters, some can't identify the first letter of their first name, and others are learning the English language at the same time as the regular curriculum. We use our own internal systems of assessment to monitor their progress and adjust when needed. Unfortunately, the current landscape of high stakes standardized testing not only consumes invaluable instructional time, but also requires resources such as teachers needed to proctor, as well as technology to deliver the assessments that are needed for daily instruction. Urban students from low socioeconomic backgrounds need every minute of instruction available to them if they are going to perform at the levels of their more affluent peers. Although required federally, New Jersey should utilize any opportunity possible to reduce the volume of assessment that begins in Third Grade. This can be done by identifying and implementing the minimum amount of assessment necessary to be compliant and meet the standard that the United States Department of Education requires for accountability purposes.

The results of standardized assessments are currently used to identify the lowest performing schools for monitoring in an effort to improve student performance. This was originally done through the Collaborative Assessment for Planning and Achievement (CAPA), the Regional Achievement Centers (RAC), and most recently via The Office of Comprehensive Support. WPS has had schools subjected to all of these entities as a result of low test scores. Many meetings and mandatory reports later, the primary outcome of these mechanisms of state intervention is a disruption of the educational environment, with no quantifiable positive improvement that can be credited to these initiatives.

Working as a district in the New Jersey Network of Superintendents (NJNS), the approach to creating equity is predominantly focused on opportunity and access for ALL students regarding Pre K to 12 programs. We often hear about the outcomes of leveled coursework beginning in elementary school as early as third grade. These decisions can determine the trajectory of students for their entire school career. Finding solutions to remove barriers for minority populations is a focus of the group, and we learn that these barriers exist throughout the state. Schools tend to heavily weight standardized test scores in this identification process. A great volume of research exists regarding the validity of these assessments, as well as the bias many of their items contain. Most recently, attention has been focused on the validity of writing scores generated by artificial intelligence. There is also plenty of data to show the difference in performance trends when comparing demographic subgroups. For example, when SAT scores are disaggregated by household income, the scores increase as wealth increases.

It should also be noted when discussing validity of standardized assessments due to bias and scoring issues, that New Jersey is one of 12 states in the country that continues to make the high stakes decision

regarding the issuance of a high school diploma, by requiring a passing score on a standardized state assessment. This issue received a great deal of attention this year as we identified pathways for the current cohort of high school students to earn their diploma. Prior to the court challenge regarding New Jersey's requirement for students to take and pass an 11th grade test, students had a menu of options to satisfy the state's assessment requirement to earn their high school diploma. For students who could not pass these assessments, the final option was to go through the portfolio appeal process.

The argument has been made that we need this assessment requirement in an effort to keep the playing field even for students in urban and/or low socioeconomic areas when compared to students who attend districts in more affluent areas. Data from the NJDOE Graduation Pathway Data Collection show disparate outcomes for minority students and those from low socioeconomic backgrounds.

2018 data show that:

- 88% of the students who used the portfolio appeal were Black or Hispanic.
- 60% were economically disadvantaged.
- 31% were ELL.

2096 students were denied graduation for failing to pass a high school end-of-course PARCC, substitute competency tests, or portfolio appeals in 2018. Of them:

- 64% were Black or Hispanic.
- 49% were economically disadvantaged.
- 11% were ELL.

A disaggregated version of this data is needed to identify the number of students who pursued the portfolio process and were denied a high school diploma as a result. However, locally in WPS, we have not had a student be denied graduation via the portfolio process in my five years as superintendent. Are we, in effect, requiring minority students from low socioeconomic backgrounds to do more than their more affluent non-minority peers in order to earn a diploma? If so, are the accountability systems that are defended as mechanisms to ensure equity, actually facilitating inequities by doing more harm than good for minority students from low socioeconomic backgrounds? It is worth noting that for students whose families have the means to attend a private high school, there is no state testing requirement as a condition of high school graduation.

New Jersey identifies the standards which school districts use to generate curriculum. The state identifies a minimum amount and type of credits that students must complete as a graduation requirement, upon which our high schools build credit bearing coursework that students earn credit for passing. Students who meet these academic requirements, along with others such as attendance, but are not successful with the high school end-of-course PARCC or substitute competency tests, are given the opportunity to go through the portfolio process.

The state of New Jersey can control how standardized assessments are impacting the education of its students. I ask that the committee consider the following:

- Return the decision to issue a high school diploma to the public school districts, and remove this decision from third party test vendors (78% of the country follows this structure).
- Identify what is required to be compliant within the federal requirements, and find a way to do so with the least amount of disruption and negative impact to the education of our students.
- Ensure that school monitoring initiatives as a result of test scores improve the educational environments of schools, and prevent them from hindering the education that is in process.

Sincerely,



J. Kenyon Kummings, Superintendent



Meeting Location
188 Crest Haven Rd.
Cape May Court House
New Jersey 08210

September 28, 2016

To Whom It May Concern:

Attached you will find a resolution entitled; "Resolution of the Cape May County Administrators Association Concerning the Educational Impact of the PARCC Assessment". This was adopted by the Cape May County Administrators Association at its meeting on September 14, 2016. This resolution represents the position of the Association in its entirety, and was drafted utilizing notes from committee meetings of NJASA, CMCAA roundtables, as well as other documents, artifacts, and research.

The aim of this resolution is to identify global concerns of superintendents and other stakeholders within public education around the PARCC, and frame them in a manner that it will be considered for duplication across all 21 superintendents' county roundtables, as well as by any other educational entities and/or advocates of public education. The CMCAA maintains a willingness to partner with the NJDOE as well as other policy makers and legislators, to create the best possible environment for the education of all students, and to maintain and expand upon the outstanding reputation of public education that New Jersey has worked so hard to establish. Please share the resolution as you see appropriate.

Sincerely,

A handwritten signature in black ink, appearing to read "JK", enclosed in a thin black rectangular border.

J. Kenyon Kummings
Superintendent, Wildwood Public Schools
NJASA Legislative Committee representative for Cape May County

JKK/jmp

**RESOLUTION OF THE CAPE MAY COUNTY ADMINISTRATORS ASSOCIATION
CONCERNING THE EDUCATIONAL IMPACT OF THE PARCC ASSESSMENT**

WHEREAS, on October 30, 2014, the Commissioner of the New Jersey Department of Education (NJDOE) stated that there are no formal procedures for parents to opt their children out of the 2015 administration of the PARCC assessment and implied that district Chief School Administrators (CSAs) take punitive action against parents who choose to opt out; and

WHEREAS, CSAs released public statements to their communities following the October, 30, 2014 memo, based on the Commissioner's guidance, that opting out of PARCC is not permitted and could result in disciplinary action; and

WHEREAS, the Commissioner of the NJDOE gave conflicting testimony on opt outs at the State Board of Education meeting on January 7, 2015 and implied that school leaders should accommodate opt-outs; and

WHEREAS, the seemingly inconsistent guidance provided by NJDOE officials to CSAs continues to disrupt the educational environment of school districts by providing inaccurate and/or incomplete information regarding the diagnostic value of the assessment and the most recent untimely August 31, 2016 NJDOE Broadcast announcing the change in mSGP percentages for teacher and principal evaluation; and

WHEREAS, the NJDOE required districts and charter schools whose spring 2015 PARCC participation rates were below 95% of eligible test takers to create a corrective action plan detailing how they will increase participation rates for this spring's PARCC; and

WHEREAS, the NJDOE exacerbates district scheduling and time constraints by providing late notice of field testing that not only further disrupts the educational environment of school districts but causes additional human and financial resources to be expended to re-design the assessment schedule and communicate the revised schedule to faculty, students and parents; and

WHEREAS, the majority of states have now dropped the high school exit exam as a requirement for graduation from high school; and

WHEREAS, New Jersey public schools have one of the highest high school graduation rates and highest ratings on the National Assessment of Educational Progress and the National Bureau of Economics Research and research members of the American Educational Research Association have found that high school exit exams increase incarceration rates and have no influence on employment and wages; and

WHEREAS, research by the College Board clearly suggests that high school grade point average is a better indicator of first-year college success and later persistence through college than the SAT and approximately 1,000 colleges and universities do not require either ACT or SAT results or make submitting the scores optional for students; and

WHEREAS, the format and timing of the PARCC assessment has changed since the spring administration in 2015, in that the 2014-2015 school year was designated by the NJDOE as a “New Baseline” year that contained two PARCC assessment windows, the results of which were aggregated to determine final performance; and

WHEREAS, in the 2015-2016 school year, the PARCC assessment consisted of one assessment window to determine a final performance; and

WHEREAS, the validity of the comparison between the 2014-2015 and 2015-2016 school years will now be compromised due to the change in the structure of the delivery and overall design of the PARCC assessment; and

WHEREAS, students, schools, teachers, administrators, and districts will still be held accountable for performance based on the results of this compromised comparison of the 2014-2015 and 2015-2016 school years’ PARCC assessment data, and student participation rates over which districts have little control; and

WHEREAS, the preparation for, and administration of the PARCC assessment consumes a great volume of valuable instructional time and resources with no demonstrable instructionally valuable return, (i.e., that the assessment would be diagnostic at the student level); and

WHEREAS, results from empirical studies conducted during the last four years have consistently demonstrated that student results on New Jersey state mandated tests of skills and knowledge at all grade levels can be predicted by community and family census data.

NOW, THEREFORE, BE IT RESOLVED that the Cape May County Administrators Association (“the association”)

(1) Urges the NJDOE to conduct a top down review of the entire premise of state mandated standardized high school exit exams; as well as the entire premise of high stakes standardized assessments in grades 3-12, with focus on cost, value, validity, and disruption by said assessments to the instructional environment of schools; and this association further

(2) Urges the NJDOE to explore other statewide assessments, in which the local districts share leadership for assessment with the state, along the lines of the Nebraska STARS programs that operated from 2000 to 2009, or The New York Standards Performance Consortium; and this association further

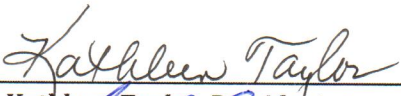
(3) Urges the NJDOE to review the accountability put upon districts, schools and faculty based on the PARCC assessment system that has not been proven to be a valid measurement of an effective instructional program; and this association further


(4) Urges the NJDOE to perform an inquiry of the damage to the instructional programs of school districts caused by the PARCC assessment system, and to determine the value to the taxpayers of New Jersey of the PARCC assessment.

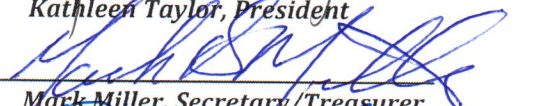
BE IT FURTHER RESOLVED, that this resolution be certified and submitted to our State Representatives, The New Jersey Association of School Administrators, the New Jersey School Boards Association, The New Jersey Principals and Supervisors Association, local municipal leaders, the board secretaries of each school district in the county, the County Office of Education, and the Office of the Commissioner of Education.

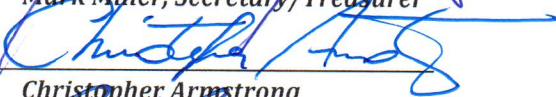
CERTIFICATION

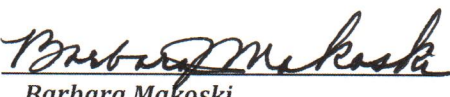
I, **Kathleen Taylor, President** of the Cape May County Administrators Association, in the County of Cape May, and the State of New Jersey, do hereby certify that the foregoing resolution is a true copy of the original resolution duly passed and adopted by the Cape May County Administrators Association at a meeting held on the 14 day of Sept, 2016.

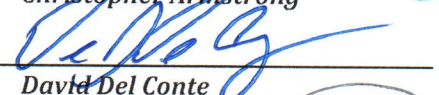

Kathleen Taylor, President

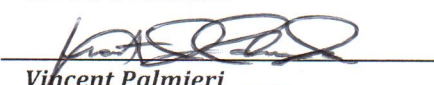

Victoria Zelenak, Vice President


Mark Miller, Secretary/Treasurer

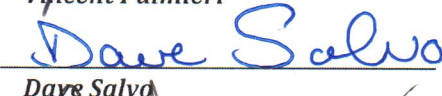

Christopher Armstrong

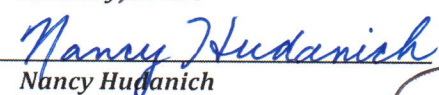

Barbara Makoski

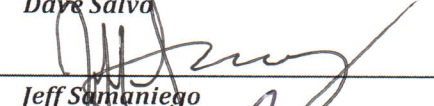

David Del Conte


Vincent Palmieri

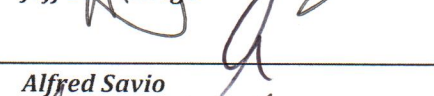

Anthony Devico


Dave Salvo

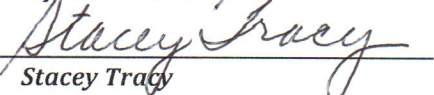

Nancy Hudanich


Jeff Samaniego


Christopher Kobik


Alfred Savio


J. Kenyon Kummings


Stacey Tracy

Dated: 9/14/16



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Wildwood Public Schools

October 11, 2016

RE: ESSA Testimony Before the Joint Committee on Public Schools

To Whom It May Concern:

Good afternoon, my name is Kenyon Kummings, Superintendent of Wildwood Public Schools in Cape May County. Our district has a high percentage of economically disadvantaged students and is racially and ethnically diverse. I am here today to testify on two separate but related concerns.

Free and Reduced Lunch Status as a Data Point in Structuring Peer School Groups

NJASA Vision 20/20 Key Factors:

- Services that focus on high expectations and emphasize individualized outcomes in order to maximize the achievement of special needs youngsters
- Governance policies and practices that enhance trust and foster collaboration, communication and coordination

The first of which is on the use of free and reduced lunch status as a metric within any school accountability system, and primarily when identifying peer schools for use in the school performance reports. The performance report is the New Jersey Department of Education's (NJDOE) main vehicle for communicating with the public regarding the status and performance of our schools. We know from peer-reviewed studies, and over two decades of data from the National Assessment of Educational Progress (NAEP) that students on reduced lunch do not score statistically significantly differently than students not eligible for reduced lunch. However, students eligible for free lunch do score significantly lower. To aggregate the two is to create an inaccurate portrayal of the social conditions that a school is charged with navigating. For example, the composition of our elementary school is 90% free and reduced, with 85% free and 5% reduced. Under the current system, our school could be grouped with a school with the inverse of that distribution that is 5% free and 85% reduced. Those numbers represent two very different schools within two very different communities.

My request is that the department look to abandon the use of the percentage of students receiving reduced cost lunch and rely on either the free lunch rates exclusively, or the state of New Jersey's direct certification numbers that indicate if students are involved with the School Nutrition Assistance Program, Temporary Assistance for Needy Families, Food Distribution Programs and/or are foster children. This would be a standardized metric that would result in a more accurate portrayal and grouping of schools on reports such as the school performance report, or its next iteration.

Standardized Testing, Frequency and Accountability Structures

NJASA Vision 20/20 Key Factors:

- The recognition of many different and rigorous paths to academic achievement, all of which lead to lifelong learning and careers
- Ongoing and continuous professional development support to maintain the effectiveness of all educators

The second concern is in regard to standardized testing frequency and accountability structures. With the onset of NCLB in 2001, we began administering standardized tests in grades 3-8 and 11. That has now grown to potentially 6 compulsory assessments across ELA and Math during high school, one of the highest amounts of high school testing in the country. Any opportunity to decrease the frequency and volume of mandated testing will result in more opportunities for learning as well as a reduction in costs at the school, district and state levels. In addition, many states have abandoned the use of a standardized assessment as a graduation requirement (see attached CMCAA Resolution). Any opportunity to reduce the amount of state standardized assessment via pilots within ESSA should be strongly considered.

The results of standardized assessments are currently used to identify the lowest performing schools for monitoring in an effort to improve student performance. This was originally through the Collaborative Assessment for Planning and Achievement (CAPA), and most recently via the Regional Achievement Centers (RAC) an idea borrowed from other states. The implementation of ESSA offers an opportunity evolve from the current vantage point of monitoring into a new system with a focus on capacity building and support in a more thorough and efficient manner, taking into account protocols that have a proven record of effectiveness. There already exist national school accreditation associations for feedback and growth that have demonstrated track records: (i.e. Middle States Elementary and Secondary School Accreditation, and New England Association of Secondary Schools; Western Association of Schools and Colleges).

Furthermore, given the focus on global competitiveness, it is more appropriate to look at international accreditation agencies that can collaboratively and effectively provide feedback on how well our schools are growing toward offering international educational experiences. Agencies like the Council for International Schools or AdvancedED, among a host of others, offer international perspectives for growth. For all their good intentions, the RACs do not have the personnel, nor the resources to provide that type and level of support. We need a 21st century model built on growth to replace the current 19th century model built on monitoring. For example, the NJDOE could facilitate partnerships between schools in NJ that share similar demographics and challenges to share best practices that have been successful in areas identified for school improvement such as the dropout rate or specific achievement gaps. They could also facilitate partnerships with international schools to help create professional learning networks. The NJDOE would then be in a position to help facilitate customized and collaborative professional development between two or more districts, as opposed to applying the same set of standardized principles to all schools.

By reducing the amount of standardized assessments, and by restructuring the accountability systems, the NJDOE has an opportunity to decrease the cost of school improvement initiatives and increase the efficiency and effectiveness of public education in New Jersey.

Sincerely,



J. Kenyon Kummings, Superintendent