



March 22, 2021

Dear Secretary Cardona,

The educational researchers who are signing on to this letter disagree with the core conclusion of the February 22nd letter from the U.S. Department of Education (USED) to chief state school officers. Declining states' requests for waivers of standardized testing in 2021 will exacerbate inequality and will produce flawed data in the midst of the pandemic.

We are, however, heartened that you and the new administration are committed to educational equity and to the sound use of research. In that spirit, this letter identifies inherent problems with testing this spring and places those problems in the larger context of research about test-based accountability systems. We also propose a number of research-based steps that USED can take to ameliorate the negative impact of standardized testing on our most vulnerable students.

First, we strongly urge USED to work with states to approve requests for flexibility as they attempt to limit statewide testing, especially in states where significant numbers of students are still engaged in remote learning and where the state request has identified alternative data sources that can meet state needs. This recommendation is based on the following:

- The results of remotely administered tests will not be equivalent to the results of in-person testing.
- Great variability in participation rates and non-random selection bias make it impossible to compare results across schools or between this year and previous years. Once such uses are removed, it is not possible to justify the known negative consequences of high-stakes testing.
- Despite warnings and cautiousness noted in the USED letter, there is no way to prevent misinterpretation and misuse of these highly flawed data.

Second, rather than focus on student assessments this spring, we encourage USED to make future investments in more holistically evaluating school quality—by developing new measures of educational opportunities. Work by the Beyond Test Scores Project with the [Massachusetts Consortium for Innovative Education Assessment](#) provides one such example. The National Education Policy Center's [Schools of Opportunity](#) project provides another. Such approaches will not solve the well-documented negative consequences associated with standardized testing, but they do point the way to providing the nation with better information about how our education system is serving our most vulnerable students. Such new measures should:

- Foster accountability systems that do not simply repackage demographic data. We need systems that do not stigmatize schools serving low-income and racially marginalized students—systems that disrupt, rather than exacerbate, segregation.
- Return richer and more varied information to educators on a more rapid basis, empowering them as professionals to design classroom- and school-level responses.
- Provide families and communities with information about schools that aligns with their broad range of values and concerns.

Third, we urge the department to heed existing research and step back from high-stakes testing by granting waivers, issuing guidance, developing regulations, and ultimately advocating for Congress to reauthorize an improved ESEA. We applaud USED's recent decision to emphasize the importance of data for informational purposes, rather than high-stakes accountability. In light of research evidence, we wish to underscore the importance of continuing this practice in the future.

- For decades, experts have warned that the high-stakes use of any metric will distort results. Analyzing the impact of NCLB/ESSA, scholars have documented consequences like curriculum narrowing, teaching-to-the-test, the “triaging” of resources, and cheating.
- For the past 20 years, experts have disproven the premise that meaningful school improvement can be driven by exposure to competitive markets and corporate-style performance management.

The damage inflicted by racialized poverty on children, communities, and schools is devastating and daunting. To that end, we understand why some civil rights groups have advocated for systems that use standardized tests to highlight inequalities. Whatever their flaws, test-based accountability systems are intended to spotlight those inequalities and demand they be addressed. But standardized tests also have a long history of causing harm and denying opportunity to low-income students and students of color, and without immediate action they threaten to cause more harm now than ever.

Although our immediate concern is with today's students in a time of crisis, the flaws in our measurement and accountability system are ongoing. Changing that system must be part of a larger shift in how we care for and educate the nation's children.

We welcome further conversations with you about this matter and would be honored to serve as thought partners in the service of America's students.

Sincerely,

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Please see attachment for additional signatories.