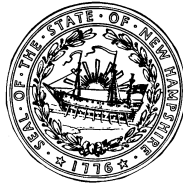


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TO: Representative Murotake

FROM: Heather Gage, Division of Educational Improvement Director
New Hampshire Department of Education

DATE: March 3, 2014

RE: Response to email questions (sent on February 26, 2014)

Thank you for reaching out to the NH Department of Education (Department) regarding your questions on delaying the implementation of the Smarter Balanced assessment. It is important to be clear on the front end that the Department is opposed to any delay in this assessment for a variety of reasons described below.

As a quick overview, here are four of the most important points:

- As I mentioned, the "framework document" your bill (HB 1432) centers on was developed to serve as a working template for the field. It was not adopted by State Board of Education and carries no authority.
- The State of New Hampshire is not implementing a high-stakes assessment. Among the many differences between New Hampshire and other states has been its steadfast commitment to its position that the statewide assessment is only ONE measure of student performance at one point in time.
- The NH Flexibility Waiver's requirement that a portion (no percent is mandated) of an educators evaluation take into account the statewide assessment (only in schools that accept federal Title I funds) **doesn't even go into effect until the 2016-17 school year – 2 ½ years from now** (which would be the first year of implementation if your bill were to pass). To implement the Smarter Balanced Assessment, or any other assessment, for the first time the same year that it is used in teacher evaluation is not fair to teachers!
- Our waiver also states that our annual assessment will be the Smarter Balanced Assessment. Any statewide assessment must be approved by the U.S. Department of Education. This can take a significant amount of time and could potentially put us in the position of having no assessment at all in 2015, clearly jeopardizing our waiver and federal funding.

To be helpful, I have outlined the topics you sent in your email and have provided our responses.

1. Removing the “framework” reference

As I mentioned, the framework document you described in your bill was put together at the request of the field to understand how many of the different initiatives (some required, most voluntary – like the competency assessments) from the state fit together. **This framework was not adopted by the State Board of Education and is only a resource for schools and district.**

2. Saving money by withdrawing from the Smarter Balanced Assessment Consortium

No! Going with another alternative will more than likely cost the state more and also will likely not lead to a better result than the Smarter Balanced assessment. A [study completed by the Brookings Institute](#) states that there is a cost savings for states that collaborate on assessments as we know with our work on NECAP.

3. Jeopardizing the NCLB Flexibility Waiver

The Department must have an assessment aligned to the state’s standards in mathematics and English language arts. Our waiver states that this will be the Smarter Balanced Assessment. Any assessment **MUST BE** approved by US Department of Education. This can take a significant amount of time and could potentially cause us to not be able to implement any assessment by 2015. This will absolutely jeopardize our waiver and federal funding!

4. Amending the bill

We do not support moving forward with any language instituting a delay on the Smarter Balanced Assessment at all. The reason for the perception that your bill will prohibit any annual assessment is that the state has not piloted or field tested any other assessment in the state for next year, whereas we have piloted and will soon field test Smarter Balanced. Smarter Balanced is the only option for New Hampshire’s requirement of a statewide assessment for the 2014-15 year. Plus, we believe it will be a great measure of student learning. Statewide assessment systems must provide evidence that the assessment is valid for its intended purposes, is reliable to support the intended accountability uses, is fair for all student groups and meets other technical criteria as outlined by the U.S. Department of Education’s peer review guidance. Additionally, it would not be fair to teachers and students to implement a new state-wide assessment that has not been vetted, piloted and field tested for **at least** a full academic year. The reason for the pilots and field tests is to give us the ability to see the challenges of the new assessment and work on solutions before the full implementation. Removing that ability does not honor the teaching profession and the work of districts.

5. Contracting with Measured Progress for a Smarter Balanced alternative

Please note: Oklahoma is the first, and to our knowledge, the **ONLY** state field testing the items that Measured Progress has put together. Smarter Balanced is being vetted, piloted and field tested by 23 states that educate over 19 million of the nation’s public K-12 students – including New Hampshire students. In the judgment of the Department, it would be a disservice to our teachers and students to deploy an assessment in which teachers have not had any engagement opportunities. If it is not okay for us to implement an assessment that is going to be used by over 20 states, why would it be okay to use an assessment of only one. We are also not sure that Oklahoma has the high aspirations we have for our students in New Hampshire. Further, there is no fiscal analysis attached to the requirement Measure Progress described for the additional psychometric work.

6. Contracting with other states to use their assessments or entities for a Smarter Balanced alternative

The states described as “delaying implementation” of their CCSS examinations all have other options that have been vetted internally in THEIR state and they have had the funds to at least partially align their current statewide assessments to CCSS. New Hampshire does not have that option, as stated in the Measured Progress letter that I presented to the committee. Also, it is incorrect to assume that any of those assessments in other states is going to be better at signaling and measuring the depth of learning intended by the Common Core. The Department has no desire to use another state’s assessment to meet our requirements when our teachers have not been engaged like they have in the Smarter Balanced Assessments (vetting, practicing, piloting, field testing, etc.), especially where there are no high-stakes attached to New Hampshire’s assessments (see more below).

We continue to look at other assessments such as the SAT to determine an alignment to our state standards. However, the College Board has been very clear that their SAT aligned assessment will not be ready until 2016.

7. High Stakes Assessments

We do not dictate and we would certainly not want to predict what other states may do regarding their assessment systems. MA and NY delays have been primarily around the fact that their statewide assessments are high-stakes (used for decisions regarding teacher tenure, hiring/termination, student graduation requirements, etc.). THIS IS NOT THE CASE IN NEW HAMPSHIRE. New Hampshire does not implement a high-stakes statewide assessment and, instead, has been steadfast in its position that the statewide assessment should be ONE measure of student performance at one point in time.

The state’s Flexibility Waiver’s requirement that a portion (no percent is mandated) of an educators evaluation take into account the statewide assessment (only in schools that accept federal Title I funds) **doesn’t even go into effect until the 2016-17 school year – 2 ½ years from now** (which would be the first year of implementation if your bill were to pass). This would not be fair to teachers! Even though we deliberately wrote that timeline into our waiver to ensure low-stakes – due to our belief that this is only one measure of student performance – we were also clear in our commitment to multiple measures and that one test, unlike in other states that you’ve described above, should NEVER be used to “judge” student or teacher performance alone or even primarily. The NH Task Force on Effective Teaching’s [Phase II report](#) is very clear on that as well and is being used as a model around the state.