January 15, 2021

The Honorable Joseph R. Biden
President-Elect
Biden-Harris Transition
c/o Biden-Harris Transition
1401 Constitution Ave, NW
Washington, D.C. 20230

The Honorable Dr. Miguel Cardona
Nominee – Secretary of Education
c/o Biden-Harris Transition
1401 Constitution Ave, NW
Washington, D.C. 20230

The Honorable Robert P. Casey, Jr.
Member
United States Senate
393 Russell Senate Office Building
Washington, D.C. 20510

The Honorable Pat Toomey
Member
United States Senate
248 Russell Senate Office Building
Washington, D.C 20510

Dear President-Elect Biden, Dr. Cardona, Sen. Casey and Sen. Toomey:

Thank you for your commitment to our nation’s students and schools as everyone continues to navigate the ongoing impact of the COVID-19 pandemic. We appreciate your recognition of the importance of education, the need to reopen schools safely and the inclusion of public education officials in your advisory teams. For the first time in a long time, public education has a seat at the table and our members are optimistic that their voices will be heard.

With that said, we must elevate one of their foremost concerns and that is around federally-required standardized testing for the 2020-2021 school year. Admittedly, our members share a common apprehension of the overstated emphasis our nation has placed on standardized testing in a regular school year, but they are gravely concerned about the administration of standardized testing this year. We respectfully request the United States Department of Education offer states an assessment waiver for the 2020-2021 school year in the days immediately following the inauguration on January 20th.

A goal of safely reopening schools in the first 100 days will undoubtedly coincide with the spring testing window in Pennsylvania. If students are expected to return to classrooms within days or weeks and are forced to participate in standardized testing, it would only worsen many of the negative aspects of statewide assessments. We regularly receive reports from teachers and principals each year of the negative impact these assessments have on students. Panic attacks, significant anxiety, and physical illness are not uncommon. In a year where the mental health of our students is being jeopardized on a daily basis, we must seek ways to alleviate, not exacerbate, the issue.
Teachers and principals also lament the amount of test preparation and administration in a regular school year, which generally outweighs any prescriptive benefit these summative assessments provide. This year, as you know, has been anything but normal and the data we receive on our students will neither be valid nor reliable. If we seek to safely reopen schools in the spring, testing will lead to lost opportunities for learning when our students need it most. It will also prevent many students and teachers from reacclimating to in-person instruction. It is hard to imagine the resulting pressure and continued drain on mental health if students and teachers must go from blended or virtual instructional models right into standardized test administration.

In addition, how to plan for and eventually operationalize standardized testing this year is an incredibly challenging task for administrators and teachers. Pennsylvania is not planning to make tests available online and rightfully so when considering test security issues. It will be difficult, at best, to logistically administer state assessments in conjunction with COVID-19 mitigation efforts in our schools. The testing schedule in Pennsylvania begins on March 7, 2021 and ends May 8, 2021. We are not confident that schools will be able to safely bring all students into their buildings for testing during that timeframe due to COVID-19 transmission rates and mitigation efforts. Furthermore, there is little confidence that a mass vaccination process can be completed by early March to allow for the return of full in-person schooling. Pursuing the administration of state assessments in the spring of 2021 is neither prudent nor practical.

Student assessment data can be a useful tool to understand equity and achievement gaps. However, we all know that assessment data can be taken out of context or used inappropriately. If one considers the equity disparity across the commonwealth, a system of accountability monitored through ineffective and inappropriate assessments in the absence of adequate instruction and preparation borders on malpractice. Multiple factors lead to the inappropriateness of these assessments when you consider the following:

- Students required to take these assessments will lose another five to eight days of instruction in a year when they have already been deprived of a significant amount of classroom instruction. It’s possible that five to eight days is a conservative estimate given the need to administer tests with COVID-19 mitigation efforts.
- Students whose parents have opted to have them participate in a school’s virtual (remote) learning option will not have the option of taking the state assessments in the same mode. Parents may be unwilling to send the students to school for these assessments and, if these students are present, they add to the challenge of providing a socially distanced environment in which the tests can be administered.
- Schools that have administered their own local diagnostic assessments reported an unparalleled lack of effort from students when completing the tests, leading to even more inaccurate results in addition to emotional anxiety and fatigue.
- The data received from these assessments will be unreliable and invalid as compared to other testing years. Yet, we are confident that the data will be used to compare schools and districts and provide no meaningful information to guide instructional or curricular decisions.

Public education thrives on certainty and the ability to plan. In any scenario, the physical and mental health of students, staff and families should outweigh any benefits standardized tests offer. We
respectfully ask for you to provide students, schools and educators with the certainty they need and give states the option to do what is best for their communities in terms of a federal assessment waiver.

Thank you in advance for your consideration. You have our best wishes and support as the President-Elect and administration takeover leadership of the United States on January 20, 2021.

Sincerely,

Edward Albert, Ed.D
Executive Director
Pennsylvania Association for Rural and Small Schools

Richard W. Askey
President
Pennsylvania State Education Association

Mark D. DiRocco, Ph.D.
Executive Director
Pennsylvania Association of School Administrators

Dr. John J. George
Executive Director
Pennsylvania Association of Intermediate Units

Nathan Mains
Executive Director
Pennsylvania School Boards Association

Wayne K. McCullough, DBA, PCSBA
Executive Director
PA Association of School Business Officials

Jonathan G. Ross, Ed.D.
President
Pennsylvania Principals Association

Arthur Steinberg
President
AFT Pennsylvania

cc:
The Honorable Members of the Senate Committee on Health, Education, Labor and Pensions
The Honorable Members of the PA Congressional Delegation
Linda Darling-Hammond, Team Lead for the Department of Education, Biden-Harris Transition