

Concerns Raised by Various Organizations and Individuals	Responses
<p>Time taken away from instruction</p>	<p>The testing program is designed with the goal of ensuring that students have sufficient time to demonstrate what they have learned, while providing the least disruption to regular classroom time.</p> <p>The classroom time dedicated to required state assessments accounts for a small percentage of total classroom time. For the Grades 3-8 ELA and math tests, 6 days of testing at about 90 minutes of scheduled testing time per day for both ELA and math amounts to less than one percent of the total instructional time in a typical 180-day school year calendar. Actual testing times are significantly lower and range from 50-70 minutes per day, depending on grade/subject.</p>
<p>Stress on student self-esteem</p>	<p>The assessment program is intended to provide students an opportunity to demonstrate what they have learned. Students often take their cues from adults in positions of trust. It is incumbent upon the adults in the process to reassure students and urge them to do their best to demonstrate their knowledge as they take assessments.</p>
<p>Reduced emphasis on creative thinking and problem-solving skills re: 21st Century</p>	<p>We agree that “test prep” does not contribute to effective teaching and learning. The Department advises districts that students learn best when motivated by great teachers delivering engaging instruction guided by rigorous curriculum.</p> <p>Research consistently demonstrates that students perform best on local, regional, statewide or national assessments when they have great teachers delivering high quality instruction aligned to rigorous standards. Rote test prep practices are incompatible with highly effective teaching and lead to lower student performance.</p>

<p>Reduced emphasis on creative thinking and problem-solving skills re: 21st Century – <i>continued</i> -</p>	<p>In addition, the Department believes that as we work to improve graduation rates and better engage students in our education system, quality Career and Technical Education (CTE) programs aligned to 21st jobs that our graduates will compete for has to be a part of our strategy.</p>
<p>Transparency on testing material</p>	<p>The Department has made Test Guides, assessment design information (including item review criteria and passage selection criteria), sample questions, all of the information necessary for item-level analysis of results, guidance on best practices for analyzing the results, and annotated items from the 2013 assessments (about 25% of the total items) available to the field.</p>
<p>Need moratorium on testing</p>	<p>Consistent with the Department’s approved ESEA Waiver, no new districts will be identified as Focus Districts and no new schools will be identified as Priority Schools based on 2012-13 assessment results.</p> <p>New York’s growth scores for educator accountability are based on year-to-year comparisons for similar students, all of whom experienced New York’s Common Core assessments for the first time in 2012-13. As a result, the state-provided growth scores resulted in similar proportions of educators earning each rating category in 2012-13 compared to 2011-12.</p> <p>Students will not be adversely affected by the transition to the Common Core. Common Core Regents exams will be phased-in over a seven-year period to ensure all students have the opportunity to meet Common Core graduation requirements which first apply to the students who will graduate in 2017.</p>
<p>Reduce the overall number of tests</p>	<p>The 3-8 testing program is established by requirements in the federal No Child Left Behind Act (NCLB), which mandates Grades 3-8 English language arts (ELA) and mathematics exams, at least one science exam in grades 3-5, 6-9, and 10-12, and at least one high school ELA and mathematics exam.</p>

<p>Reduce the overall number of tests – <i>continued</i> -</p>	<p>The high school Regents exams in New York State date back to the 1860s. Over the course of high school, a student must take 5 Regents exams to meet the requirements of graduation. Students are encouraged to take 2 additional Regents exams in Mathematics and 3 in Science in order to be better prepared to succeed in college and career.</p> <p>Please also note that while section 3012-c of the Education Law, which governs Annual Professional Performance Reviews, contains requirements for student learning objectives in the non-tested subjects and locally selected measures of student growth or achievement, the former are determined by districts, and the latter are subject to collective bargaining and school board presidents, superintendents, and teachers and principals unions were party to negotiations of any locally selected assessments required pursuant to all evaluation plans. Performance-based assessments with common rubrics (e.g., essays, science experiments with lab reports, etc.) can be used for both student learning objectives and locally selected measures.</p>
<p>Reduce time to take the test, length, duration, and number of questions</p>	<p>The testing times are designed to allow students sufficient time to demonstrate what they have learned. In addition, the estimated completion times are shorter than the testing times. For example, while the Grade 3 ELA test is scheduled for 70 minutes, the test is designed to be completed in 50 minutes.</p> <p>After considering feedback from the field, Grades 3 and 4 tests had shorter maximum testing time in Spring 2013 to complete than in previous years.</p>
<p>Data to be sent in a timely manner</p>	<p>Test results were released to districts in early August shortly after the performance standards were established in July. The release is expected to be earlier in future years as the standard-setting process was only necessary in Year 1.</p>

<p>Data to be sent in a timely manner – <i>continued</i> -</p>	<p>The Network Teams Institutes, a statewide professional development initiative for New York educators, began in summer 2011 along with the launch of the EngageNY.org professional development website (which has had over 30 million pageviews since its launch). Among the many resources on the site are video exemplars of excellent teaching aligned to the Common Core.</p> <p>We have provided unprecedented resources to support implementation of the Regents Reform Agenda, including offering explicit guidance regarding the changes that should occur in each district, school, and classroom in order to ensure that teachers and students are prepared for changes. For example, the Tri-State Rubric (developed collaboratively by New York, Massachusetts and Rhode Island) contains criterion-based rubrics and review processes to evaluate the quality of lessons and units intended to address the Common Core. In addition, the Department has leveraged resources to develop K-12 curriculum modules and classroom observation tools because ensuring that each of our teachers and principals has a deep understanding of the shifts demanded by the Common Core is critical to each of our students becoming college and career ready.</p> <p>In addition, the Department has made Test Guides, assessment design information, sample questions, and annotated Spring 2013 test items available to the field.</p>
<p>Does the state need 4 ½ hours for each test over 3 days</p>	<p>The testing program is designed with the goal of ensuring that students have sufficient time to demonstrate what they have learned, while providing the least disruption to regular classroom time.</p>

<p>Modifications for tests for special education students</p>	<p>The Department provides testing accommodations for students, consistent with the recommendations of local committees on special education. In addition, the Department has developed a safety net for students with disabilities through the compensatory option. In addition, the Regents have provided an additional option for special education students with the Career Development and Occupational Studies (CDOS) Commencement Credential.</p>
<p>Misalignment of standardized testing is eroding student learning time</p>	<p>We agree that “test prep” does not contribute to effective teaching and learning. The Department advises districts that students learn best when motivated by great teachers delivering engaging instruction guided by rigorous curriculum.</p> <p>Research consistently demonstrates that students perform best on local, regional, statewide or national assessments when they have great teachers delivering high quality instruction aligned to rigorous standards. Rote test prep practices are incompatible with highly effective teaching and lead to lower student performance.</p>
<p>Draining scarce resources</p>	<p>The testing program is supported by federal funding and dedicated state appropriations.</p>
<p>Need multiple measures of student learning</p>	<p>The new teacher and principal evaluation system is based on research and best practice in educator effectiveness.</p> <p>The evaluation system is based on multiple measures of how educators support student learning, including student performance, and observations by principals:</p> <ul style="list-style-type: none"> • 20% student growth on state tests or comparable measures • 20% locally selected measures of student achievement • 60% observations, student feedback and other measures
<p>Special deal made with vendor</p>	<p>All procurements of the Department must be approved by the Office of the State Comptroller. We have a track record of closely following and adhering to state procurement guidelines.</p>

<p>Giving away my child's information</p>	<p>All local and state data systems must strictly adhere with the privacy protections contained in the federal Family Educational Rights and Privacy Act (FERPA). School districts are allowed (and must continue to be allowed) to use student data for legitimate educational purposes. However, data can only be used by vendors for the contracted purposes of the state or districts and cannot be resold or released.</p> <p>We have and will continue to put in place best practice measures to protect students and safeguard data. Efforts to limit state and local data systems use would render virtually impossible – or extraordinarily much more expensive – the day-to-day data management work of schools. Everything from class schedules to school lunches to transportation to special education services to high school transcripts for college applications would be impacted.</p>
<p>Value Added Model formula is not clear or understood</p>	<p>After deliberation, the Board chose to not move forward with a Value-Added model this year and committed to implement a Value-Added model in 2014-15. The Department will continue to engage stakeholders to develop the Value-Added formula to be implemented in 2014-15 as we continue with implementation of the teacher and principal evaluation system.</p>
<p>Tests are only one measure of student learning</p>	<p>We completely agree that tests are only one measure of student learning, which is why the elements of the new teacher and principal evaluation system is based on multiple measures of how educators support student learning, including student performance, and observations by principals.</p> <p>Another key component of the evaluation system is that it is designed to provide educators regular meaningful feedback to support continuous improvement.</p>

<p>Believe that State test scores are the primary tool in evaluating teachers</p>	<p>The new teacher and principal evaluation system is based on research and best practice in educator effectiveness.</p> <p>The evaluation system is based on multiple measures of how educators support student learning, including student performance, and observations by principals:</p> <ul style="list-style-type: none"> • 20% student growth on state tests or comparable measures • 20% locally selected measures of student achievement • 60% observations, student feedback and other measures
<p>The Common Core is a federal takeover of K-12 education</p>	<p>The development of the Common Core was a state-led effort spearheaded by the National Governors Association and the Council of Chief State School Officers. The drafting process relied on teachers and standards experts from across the country.</p> <p>Teachers have been a critical voice in the development of the standards. The National Education Association (NEA), American Federation of Teachers (AFT), National Council of Teachers of Mathematics (NCTM), and National Council of Teachers of English (NCTE), among other organizations were instrumental in bringing together teachers to provide specific, constructive feedback on the standards.</p>
<p>The Common Core requires the teaching of scripted modules from SED.</p>	<p>Curricular materials are designed to be adopted or adapted. Some lessons provide detailed instructions or recommendations but it is important to note that the lessons are not scripts and rather they should be viewed as vignettes so that the reader can imagine how the class could look.</p> <p>Lessons are adaptable and allow for teacher preference and flexibility so that what is happening in the classroom can both meet students' needs and be in service to the shifts and the standards. If a teacher chooses to make significant changes to lessons, the Tristate/EQuIP rubric is available to help evaluate the quality, rigor and alignment of adapted lessons.</p>

<p>SED has to approve any changes to the curriculum modules.</p>	<p>Local districts may use the optional curriculum modules as they see fit. If a district elects to use the modules with adaptations, there is no need to have those changes approved by SED. Curriculum is – and always has been – a local responsibility.</p> <p>There is no intention of using these modules as a “script” for delivering instruction. The modules are tools that may be integrated into professional practice. In addition, the Tri-State rubric was developed to help support districts that elect to write their own curriculum.</p>
<p>The Common Core requires students to take more tests.</p>	<p>Implementation of the Common Core does not require additional testing.</p> <p>The 3-8 testing program is established by requirements in the federal NCLB, which mandates Grades 3-8 ELA and math exams, at least one science exam in grades 3-5, 6-9, and 10-12, and at least one high school ELA and math exam.</p> <p>The high school Regents exams date back to the 1860s. Over the course of high school, a student must take 5 Regents exams to meet the requirements of graduation. Students are encouraged to take 2 additional Regents exams in Mathematics and 3 in Science in order to be better prepared to succeed in college and career.</p> <p>Please also note that while section 3012-c of the Education Law, which governs Annual Professional Performance Reviews, contains requirements for student learning objectives in the non-tested subjects and locally selected measures of student growth or achievement, the former are determined by districts, and the latter are subject to collective bargaining and school board presidents, superintendents, and teachers and principals unions were party to negotiations of any locally selected assessments required pursuant to all evaluation plans. Performance-based assessments with common rubrics (e.g., essays, science experiments with lab reports, etc.) can be used for both student learning objectives and locally selected measures.</p>

The Common Core requires a reduced emphasis on subjects other than English language arts and Mathematics.

The Common Core English language arts standards are standards for ELA and Literacy in Science, Social Studies, and the Technical Subjects. In addition, one of the six shifts in the ELA standards is an emphasis on the development of background knowledge, which is intended to strengthen the role of the elementary teacher as a guide to the world and reinvigorate the teaching of science and social studies in the early grades.

New York is considering adoption of the Next Generation Science Standards. In addition, we are working with educators from across the state on the development of a new P-12 social studies framework which emphasizes increased research, use of primary sources, and writing with evidence drawn from text.

The Board of Regents value and require the important role of teaching art, music, and physical education. Recently, the Board has engaged the cultural institutions of the state to support Common Core implementation.