



NATIONAL COUNCIL OF
TEACHERS OF MATHEMATICS

May 25, 2016

The Honorable John B. King, Jr.
Secretary of Education
400 Maryland Avenue SW
Washington, DC 20002
Transmitted via email to ESSAguidance@ed.gov

Dear Secretary King:

The National Council of Teachers of Mathematics (NCTM) welcomes the opportunity to comment on changes to federal K-12 education law as required by the implementation of the Every Student Succeeds Act (ESSA). NCTM is the world's largest mathematics education organization with 70,000 members and more than 230 Affiliates throughout the United States. NCTM is the public voice of mathematics education, supporting teachers to ensure equitable mathematics learning of the highest quality for all students through vision, leadership, professional development, and research. We appreciate your consideration of these comments.

Title I and Assessments

The new law requires significant changes for states, districts, and schools. Mathematics educators are particularly concerned with some of the possible effects of the law's proposals related to assessments. While the negotiated rulemaking committee discussed some of these issues at its meetings, NCTM would like you to consider the following comments regarding Title I assessments.

NCTM supports the requirement of statewide assessments, especially adding flexibility related to locally selected high school assessments and innovative assessment systems. However, for state assessments to effectively support students' learning as intended, the following are essential:

- Each state's assessments must assess all aspects of mathematical knowledge—procedural skills, conceptual understanding, problem solving, reasoning, and the ability to construct and evaluate mathematical arguments—at each grade and in high school. For this to occur, each state's assessments must include a performance assessment component.
- Each state must allocate adequate testing time to allow for the inclusion of performance assessments. While we agree that too much instructional time is



NATIONAL COUNCIL OF TEACHERS OF MATHEMATICS

currently being used for assessment purposes, the problem is not the actual testing time. Rather, the problem is the amount of time spent on activities of questionable value that are intended to increase test scores, e.g., practice tests, test-prep activities, and benchmark testing to predict students' test scores. Therefore, we encourage the Department to be more specific when it calls for reduced testing time, and encourage states to dedicate adequate testing time to include high-quality performance assessments, while reducing or eliminating time spent on state-mandated benchmark and/or practice tests.

- We encourage the Department to establish a mechanism to ensure that assessments used in different SEAs and LEAs are of comparably high quality in assessing students' mathematical proficiency. For a large number of states NAEP assessment results have indicated considerable gaps in the percentage of students deemed proficient on NAEP compared to the percentage of students deemed proficient on their own state's assessments. These gaps reflect significant differences in expectations across states, differences that must be addressed to ensure that all students have adequate preparation for their future, regardless of the state in which they reside.
- Each state ensures that the new law's provisions related to allowing eighth graders who are taking advanced coursework to take a test other than the state-established eighth-grade math assessment. It is important to consider some of the potential negative consequences of this provision. These include skewed assessment results if high achievers are not being included in the eighth-grade cohort because they take an assessment for an advanced course instead. This could also be a missed opportunity to ensure that eighth graders are fluent in important grade-level mathematical concepts and skills, such as statistics and probability, before they enter high school.

In replacing AYP (adequate yearly progress) with SEA-developed accountability systems, it is important to ensure that:

- The current requirement of a minimum of 95 percent participation of students in the assessments be maintained to ensure that particular students or subgroups of students are not excluded from the accountability system.
- The criteria for determining a subgroup need to be specific enough to ensure that particular subgroups are not systematically excluded from the accountability system.

We are concerned that by replacing AYP with new requirements that focus on only the lower-performing schools, many marginally performing schools will have no incentive to improve. Instead we urge the Department to work with states to



NATIONAL COUNCIL OF TEACHERS OF MATHEMATICS

develop a system in which all schools will be held accountable for continuous improvement, with special attention on the performance of traditionally underperforming subgroups of students.

Finally, we support maintaining and updating the requirement that state Title I plans describe how low-income and minority children enrolled in Title I schools are not served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers and expanding the list of elements that must be included in state and district report cards (e.g., adding a requirement to report per-pupil expenditures of federal, state, and local funds).

Title II and Investments in Professional Development

Title II of the new law provides grants to state and local educational agencies to:

- Increase student achievement to improve teacher, principal, and other leader quality and effectiveness.
- Increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement.
- Provide low-income and minority students greater access to effective teachers, principals, and other school leaders.

NCTM strongly believes that equitable distribution of effective math educators is crucial to ensuring that the country's young people have the mathematics skills necessary for success. Given the new law's elimination of the Mathematics and Science Partnerships program, NCTM hopes that the Department will require states to conduct an analysis of the demand for mathematics educators in districts and prioritize spending on professional development to address any needs in the supply or skills of mathematics educators.

Title IV, Part A and Supporting Student Success

Title IV is a new, large program that has ambitious goals and many uses. NCTM believes that the Department of Education must issue some guidance to states on how this program should work to realize its potential. Mathematics educators believe that education technology, positive conditions for student learning, a well-rounded education, blended learning, arts education, and the many other proposed activities in this new program are important to K-12 schools. Of course, a new \$1.65 billion investment requires guidance from the Department on how the program should best work, and NCTM hopes the Department will provide such guidance to states and districts.



NATIONAL COUNCIL OF
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Thank you for your attention to these views. Please do not hesitate to contact NCTM Associate Executive Director for Communications Ken Krehbiel at (703) 620-9840 ext. 2012 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Matthew Larson". A horizontal line extends from the end of the signature across the page.

Matt Larson
President
National Council of Teachers of Mathematics

A handwritten signature in black ink that reads "Robert M. Doucette".

Robert M. Doucette
Executive Director