



NATIONAL COUNCIL OF
TEACHERS OF MATHEMATICS

September 9, 2016

Jessica McKinney
Department of Education
400 Maryland Avenue SW
Room 3W107
Washington, DC 20002-2800

Dear Ms. McKinney:

The National Council of Teachers of Mathematics (NCTM) appreciates the opportunity to comment on the proposed regulations for the academic assessments required in 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 each and every student through vision, leadership professional development, and research.

Mathematics educators are particularly concerned with some of the possible effects of the law's proposals related to assessments. While the negotiated rulemaking committee addressed some of these issues at its meetings, NCTM would like you to consider the following comments regarding Title I assessments.

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 currently being used for assessment purposes, the problem is not the actual



testing time. 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 exposed considerable gaps in the percentage of students deemed proficient on NAEP compared with the percentage of students deemed proficient on their own state's assessments. This indicates that some state assessments have significantly lower expectations for "proficiency" than NAEP or other states. These differences must be addressed to ensure that all students are adequately prepared for their future, regardless of the state in which they reside.

Middle School Mathematics Exception

- Finally, we have concerns about the implications of ESSA for grade 8 students. The new law's provisions allow eighth graders who are taking advanced coursework to take a test other than the state-established eighth-grade math assessment. Some of the potential negative consequences are that this could result in skewed assessment results based on high achievers not being included in the eighth-grade cohort if they choose to take an assessment for an advanced course. It is also 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.

Thank you for your consideration of these views. Please do not hesitate to contact NCTM Associate Executive Director for Communications Ken Krehbiel at (703) 620-9840, ext. 2102 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Matt Larson".

Matt Larson
President

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

Robert M. Doucette
Executive Director