THE FLORIDA LEGISLATURE

DON GAETZ
President of the Senate

WILL WEATHERFORD
Speaker of the House of Representatives

July 17, 2013

Mr. Tony Bennett
Commissioner
Florida Department of Education
325 W. Gaines Street
Tallahassee, FL 32399

Dear Commissioner Bennett:

Thank you for your leadership and ongoing commitment to Florida's students.

As we recently discussed, Florida is at a decision point regarding the direction our state will choose in implementing assessments proposed by the national academic consortium, Partnership for Assessment of Readiness for College and Careers (PARCC). Like you, we, along with our fellow legislators, have gathered information and heard constituent questions and concerns about national standards and assessments and their impact on students, teachers, schools and our state's competitiveness.

After consulting with bipartisan leadership of the Senate and House committees on education policy and appropriations, we are troubled by serious issues in connection with PARCC:

- According to information provided recently through PARCC and earlier by the Florida Department of Education (FLDOE), the complete PARCC assessments will consume approximately twenty days of testing for elementary, middle and high school students. Further, FLDOE and PARCC both highlight additional, yet undetermined, time will be needed for students to demonstrate knowledge and skills. This is more, not less instructional time devoted to testing than is currently the case.

- The value of student assessment is (a) to provide teachers with valid, reliable information on how to customize and focus effective teaching methods to address individual student learning needs; (b) to determine whether a student has mastered the skills necessary for promotion or to design a remedial learning plan; (c) to supply student performance data that can be used as part of a teacher's evaluation. Currently, PARCC does not have a plan for the timely return

of assessment data to achieve the foregoing three objectives during the academic year the tests are administered.

- PARCC assessments are to be performed on computers. No district in the state has every one of its schools at the minimum 2:1 student to device ratio called for in the PARCC administration plan. Our current state average is approximately three students to each device. PARCC has not finalized bandwidth requirements, but tentatively recommends approximately 100kbps. Per the recent independent load testing of three Florida school districts, 50 percent of the schools were not equipped for basic testing activities. In short, neither districts nor the state can realistically achieve the minimum bandwidth and a 2:1 ratio by the anticipated 2014-2015 school year full implementation of PARCC. If some PARCC testing is to be done on computer and some by pencil, we are concerned about the prospect of further delays in getting results as well as accuracy and validity.

- To date, the cost of the full implementation of PARCC assessment materials is indeterminate, let alone the costs for the technology and professional development infrastructure necessary to effectively administer a valid assessment program.

- We remain concerned about the security of student data and consequences for the misuse of that data. Even PARCC reports final test security policies will not be released for another calendar year.

Consequently, it is our view that Florida should withdraw immediately from PARCC in favor of a Florida Plan for valid, reliable and timely testing of student performance, including assessments for the Next Generation Sunshine State Standards.

Our selection of assessments should take advantage of all available options such as state-approved end-of-course exams, proven templates of other states modified to meet Florida's needs, and well-established alternative assessment options such as the ACT/SAT. A strong technology infrastructure is the backbone that supports the success of efforts moving forward. It is therefore imperative that we take the time necessary to build a reliable and realistic, yet visionary, technology infrastructure. It is critical that we do not undermine the integrity of the entire system due to the unreliability of any one part.

Florida has a rich history of student-centered education reform. Florida's strong education policies have made us a model for the nation and have resulted in extraordinary gains in student achievement. Too many questions remain unanswered with PARCC regarding implementation, administration, technology readiness, timeliness and utility of results, security infrastructure, data collection and undetermined cost. We cannot jeopardize fifteen years of education accountability reform by relying on PARCC to define a fundamental component of our accountability system. Our schools,

teachers, and families have worked too hard for too long for our system to collapse under the weight of an assessment system that is not yet developed, designed nor tested.

Moving forward with a plan that is centered on technology but includes flexibility and diversity in the delivery and measurement of outcomes in education is critical. It would be unacceptable to participate in national efforts that may take us backward and erode confidence in our accountability system and our trajectory of continued success. The Legislature is committed to students, parents, and taxpayers of Florida. By ensuring decisions are uniquely tailored to our state, we reinforce our dedication to providing Floridians with an education that directly leads to success in the opportunities and challenges of our economy. Florida must do what it has always done in the field of assessments, which is to lead. Please know we are committed to building on our strengths and current infrastructure by crafting our own Florida Plan of assessments for the Next Generation Sunshine State Standards.

In summary, please let us know at your earliest convenience your position on the following recommendations: move forward with a Florida Plan by immediately withdrawing from the assessment portion of PARCC; provide a transition timeline phasing in a Florida Plan of assessments that begin no sooner than 2015-2016; enhance professional development for educators; establish a practical plan to integrate technology in education; and report the costs associated with a Florida Plan.

Respectfully,

Don Gaetz
President
The Florida Senate

Will Weatherford
Speaker
The Florida House of Representatives

cc: The Honorable Rick Scott, Governor, State of Florida