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January 8, 2015

Governor Dannel P. Malloy
Office of the Governor
State Capitol
210 Capitol Avenue
Hartford, CT 06106

Re: Proposed CTAA Assessment Plan for Children with Special Needs

Dear Governor Malloy:

We write to register our concerns regarding the proposed Connecticut Alternative Assessment (CTAA) plan for children with special needs, in advance of our expected meeting with you and your staff to discuss these issues. It is our hope that by providing you with some information in advance regarding our concerns, this will enable us to have a more productive discussion on how to resolve or address our issues.

By way of background, as you know, the State is in the process of transitioning from the use of the Connecticut Mastery Test (CMT) to the Smarter Balanced Assessment Consortium (SBAC) model of standardized testing for Connecticut students. Under the previous model, there was a Skills Checklist option for the CMT that could be conducted by a special education teacher for a child with significant special needs who was not capable of completing the CMT either in the standardized format, or the Modified Assessment System (MAS). This Checklist was completed entirely by the special education teacher and was used only with the 1% of students not able to demonstrate their knowledge effectively on one of the other two options. Because the Checklist was completed by the teacher, without the involvement of the student, teachers were able to complete these Checklists for their students with severe limitations over the course of several months, and return them for processing to the State Department of Education during the prescribed testing window. Completion of the Checklists did not involve the student, so, although the time required to complete the Checklist could be extensive, the special education teachers were not required to take valuable instructional time away from their students with special needs in order to administer the assessment with the students during the school day.

By contrast, the proposed protocol for the CTAA is that it must be administered by a certified special education teacher, individually administered to each student with severe limitations, one student at a time, by computer during the school day, and only during the assessment window prescribed by the State, which opens sometime in April. Because the assessment is untimed, each special education teacher is supposed to spend as much time with each student having them respond to the test prompts as necessary, based entirely on the response time of the individual student. Moreover, if the student is judged by the teacher to be unable to respond effectively, the proposed protocol allows for the teacher to respond on behalf of the student to supplement the answers submitted by the student. We have had very little feedback from the districts who piloted the CTAA on a trial basis. However, what feedback we have suggests that the average time that the test will take to administer to a child with severe needs who requires this level of assistance to respond will be about two (2) full school days.¹ Furthermore, the teacher administering the test to the student must be a certified special education teacher or speech language pathologist (SLP) who is familiar with the communication of the individual student², to be able to interpret the student's communications. For all intents and purposes, we foresee that this will require the child's primary special education teacher to administer the test to the student, since no other person will meet the requirements of the protocol.

Now, let's assume that the special education teacher in question has a caseload of ten (10) students, which is a reasonable assumption in our experience (it may be higher or lower depending on the district and the needs of the students). If each of the 10 students takes 2 school days on average to complete the assessment, that takes the special education teacher out of the classroom, leaving the classroom with a substitute teacher, for twenty (20) school days, or the equivalent of one month of the school year. No meaningful instruction will be happening for this group of students during this time, because the teacher must complete the CTAA with each student on his/her caseload during the testing window.

We are very cognizant of the needs of our students and the need to provide them with highly qualified teachers in their classrooms at all times. However, there simply is not an adequate supply of substitute certified special education teachers available in this State to

¹ It appears possible that some students may be able to complete each of the three sections (reading, writing and math) in about 2 hours per section, for a total of 6 hours. However, because these are children with severe special education needs, they often lack the attention span and stamina that would be required to sit for 6 hours of testing and complete the testing in one school day. Forcing such extended testing periods on children with severe disabilities is unlikely to lead to valid results, requiring the teachers to give the students frequent breaks between tasks, even during so-called "normal" classroom instruction. Thus, we believe it is more realistic to believe that each such severely disabled student will require an average of 2 school days to complete testing.

² While the protocol also suggests using occupational therapists or physical therapists, it also states that the person must be "certified" as an educator, and occupational and physical therapists do not possess such certification, so this does not appear to present a viable option. The caseloads of SLP's are often quite high and their daily schedules are packed with therapy appointments for students to meet the requirements of individual IEP's and conducting initial evaluations and reevaluations of students, so taking them away from their daily schedule presents a similarly devastating impact to students and their individualized needs.

provide each class populated by students with significant special education needs with a certified substitute special education teacher during the testing window, nor is it in the best interests of the students we serve to provide them with a long-term substitute for one month out of every year because their teacher needs to be pulled from the classroom to administer this assessment. We are also mindful of the fact that because these students have the most significant needs of the entire spectrum of students with special education needs, it is most challenging for them to make appropriate progress on their annual goals and short-term objectives, and they are the ones who can least afford to have their teachers taken away from them for one month out of every school year.

This untenable situation is compounded by the fact that the proposed testing window opens in April and runs through May. This is the time of year when special education providers must attend numerous "annual review" Planning and Placement Team (PPT) meetings for the students on their caseloads, to assess the level of progress being made and to plan programming for the following year. These meetings are time consuming, and they must occur during the school day, when the teachers are available to meet with parents and other team members. The amount of preparation required of teachers to participate in these meetings is often extensive, especially for children with pervasive deficits across all areas of functioning, and it typically requires many hours of assessment, report-writing, and planning for each child on the teacher's case load, above and beyond the actual meeting time. If the same teacher with 10 students on his/her caseload must attend 10 PPT meetings during this same period of time, that is additional time out of the classroom that could have the potential to contribute to lack of progress for those students.

If we are unable to provide appropriate substitute instruction to these students during the testing window, and it seems inevitable that this will be the case, then the mandate that we provide these students with instructional services that are in compliance with their Individualized Education Programs (IEP's) will not be met, and it is likely that school districts will have to provide students with compensatory services to compensate for the failure to provide a free appropriate public education (FAPE) during this time. With no time left during the school year to provide such services, it is entirely reasonable to assume that the burden of providing these compensatory services will fall to the extended school year (ESY) period during July and August, which school is not in session for most students. It is equally, if not more challenging, for districts to find appropriate services providers during these ESY sessions, since districts rely mostly on volunteers who are willing to work during the summer months when teaching contracts do not require teachers to be available. Additionally, many families plan vacations during these summer months and do not choose to make students available for summer services. Students whose parents may be working full time may decline ESY services that are provided on a partial day schedule because full day child care in another setting or a camp program is preferable. So many of our neediest students will never receive the compensatory services, even if we are able to offer them as part of an ESY program. This raises the question, why is the State putting Connecticut school districts and school children in the position of denying special education students the opportunity to access appropriate

services during the regular school year, such that they have to provide or accept the services during the summer in order to be made whole?

Moreover, the expense (financially and in terms of quality of instruction) of taking special education teachers out of the classroom for extensive periods of time and depriving students of their instruction does not appear to have any payoff to the students in terms of improved instruction. The results of the CTAA and SBAC are not made available to districts until late summer or early fall of the following school year, so no adjustments to instruction can be made during the school year in which the assessment is administered. Once the results are made available to the district, only the overall score will be provided, limiting the usefulness of the results. We will know whether the student was deemed "proficient" or not, but this will not yield any information regarding the specific areas of instruction that may need to be improved in order to better the student's next set of results. The student's IEP goals and objectives are still individualized and are running on a separate track from the CTAA, so the fact that the student may or may not be proficient in a given area on the CTAA may bear little relationship to the level of progress that student is showing on his or her IEP goals. Special education teachers will still need to take data on IEP goals and objectives and address their instruction toward meeting those goals, irrespective of the CTAA results.

Finally, it bears mention that the SEED teacher evaluation protocol mandates that even for special education teachers, the CTAA results of the students count for 40% of the results of the evaluation. Given all of the limitations indicated above, including the fact that the IEP for any given child with severe special education needs may bear little relationship to the actual individualized progress of the student during that school year, the teacher will still have 40% of his or her "grade" for the year based upon how that cohort of students performs on this test. Since the CTAA allows and even encourages teachers to "interpret" student answers for them, this seems like a clear invitation and, in fact, an incentive, for otherwise well-meaning teachers to "interpret" student responses in the direction of proficiency, thereby skewing the results and invalidating any limited information the test might otherwise provide regarding the alleged effectiveness of instruction.

We are concerned that the individuals taking the lead on the SBAC/CTAA assessment at the State Department of Education appear to have obtained no meaningful input from the Bureau of Special Education on this issue. We can only conclude that this is yet another area in which the needs of special education students and their teachers are being frozen out of the discussion due to the lack of leadership in the Bureau of Special Education. As you may know, the position of Bureau Chief in the Bureau of Special Education has been vacant for many years running. The Bureau cannot function well and take the lead on being the voice of children with special needs in State government in the absence of a Bureau Chief. In addition to considering and responding to our concerns about the CTAA assessment, we ask that you make it a priority to fund the position of Bureau Chief and appoint a Commissioner of Education who will prioritize filling this position as soon as possible.

Thank you for your time and attention to this matter. We look forward to discussing this further with you and your staff and finding some creative solutions to these identified problems.

Sincerely yours,



Michael Regan
ConnCASE President



David Scata
ConnCASE Executive Director

cc: ConnCASE Board of Directors
Charlene Russell – Tucker, Chief Operating Officer: Office of Student Supports
and Organizational Effectiveness
Dianna Roberge-Wentzel, Chief Academic Officer: CT State Department of
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