



## FADSS

Florida Association of  
District School Superintendents

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# Florida Association of District School Superintendents

July 5, 2017

Pam Stewart  
Commissioner of Education  
Turlington Building, Suite 1514  
325 West Gaines Street  
Tallahassee, Florida 32399

Dear Commissioner Stewart:

On behalf of the Florida Association of District School Superintendents, I want to thank you for postponing the adoption of the initial recommendations relating to concordant and comparative assessment scores.

In summary, the following concordant scores for the Grade 10 ELA assessment were proposed:

- (1) **SAT score of 500 on Evidenced-Based Reading & Writing (EBRW)**
- (2) **ACT score of 19**

The following comparative scores for the Algebra I EOC were proposed:

- (1) **PSAT score of 430**

As more students take the Mathematics portion of the SAT and ACT, the DOE has committed to attempt to provide comparative scores for these assessments to the Algebra I EOC.

In addition, the proposed rule rejected the use of PERT as a comparative or concordant score. If the rule passes as initially proposed, scores on the PERT would not be permitted for use as a graduation requirement for students taking the PERT assessment after the rule is adopted.

As you requested, superintendents have submitted impact data and analyses of the proposed concordant scores. The data from districts overwhelmingly shows the impact on the number and percentage of students who may be denied a standard high school diploma if the rule, as initially proposed, is ultimately adopted. The data from districts are attached.

**Concordant Scores - Grade 10 ELA Assessment – Issues and Recommendations**

One of the most troublesome recommendations is the SAT score of 500 on the EBRW (Evidence-Based Reading and Writing). The College Board has established SAT College and Career Readiness Benchmarks as follows:

- **Green:** The section score meets or exceeds the benchmark.
- **Yellow:** The section score is within one year’s academic growth of the benchmark.
- **Red:** The section score is below the benchmark by more than one year’s academic growth.

**SAT College and Career Readiness Benchmarks are as follows:**

|                                    | <b>Red</b> | <b>Yellow</b> | <b>Green</b> |
|------------------------------------|------------|---------------|--------------|
| Evidence-Based Reading and Writing | 200-450    | 460-470       | 480-800      |
| Math                               | 200-500    | 510-520       | 530-800      |

**11<sup>th</sup> Grade Benchmarks are as follows:**

|                                    | <b>Red</b> | <b>Yellow</b> | <b>Green</b> |
|------------------------------------|------------|---------------|--------------|
| Evidence-Based Reading and Writing | 160-420    | 430-450       | 460-760      |
| Math                               | 160-470    | 480-500       | 510-760      |

**10<sup>th</sup> Grade Benchmarks are as follows:**

|                                    | <b>Red</b> | <b>Yellow</b> | <b>Green</b> |
|------------------------------------|------------|---------------|--------------|
| Evidence-Based Reading and Writing | 160-400    | 410-420       | 430-760      |
| Math                               | 160-440    | 450-470       | 480-760      |

*Source: <https://collegereadiness.collegeboard.org/about/scores/benchmarks>*

A student must pass the 10<sup>th</sup> grade FSA in Reading or earn a concordant score in order to earn a standard high school diploma (s. 1003.4282, F.S.). There is no requirement that the assessment or concordant score must be a college or career ready benchmark at the time the student is tested in the 10<sup>th</sup> grade.

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The initial recommendation of a 500 on EBRW as a concordant score for the 10<sup>th</sup> Grade FSA English Language Arts assessment is above the SAT College and Career Readiness Benchmark and substantially above (by 70 points) the 10<sup>th</sup> Grade Benchmark of 430. According to the College Board, students with a SAT EBRW section score that meets or exceeds the benchmark (Green) have a 75 percent chance of earning at least a C in first-semester, credit-bearing college courses in history, literature, social sciences, or writing classes. This is a College and Career Ready Benchmark, not a benchmark for an assessment for 10<sup>th</sup> graders to meet a high school graduation requirement.

**Recommendation:** It is not reasonable to expect 10<sup>th</sup> grade students to score at a College or Career Readiness Benchmark. The recommended concordant score should be 430 which is the “Green” 10<sup>th</sup> grade benchmark. This score means that the student has met or exceeded the benchmark for the 10<sup>th</sup> grade – the grade in which the assessment is given.

#### **Comparative Scores - Algebra I EOC – Issues and Recommendations**

The initial recommendation for a comparative score for the Algebra I EOC is 430 on the PSAT/NMSQT. This would be the only option for students to obtain a comparative score if they could not obtain a passing score on the Algebra I EOC. This is the first time that the PSAT/NMSQT has been used in this manner and the true impact on students and their ability to obtain a standard high school diploma is unknown. This should not be the only option for students.

**Recommendation:** Rather than eliminate PERT, provide both options to students and study the impact on the issuance of standard diplomas by both assessments.

The PERT has been a successful option for students. Eliminating it as an option entirely could significantly impact students and preclude them from obtaining a standard high school diploma. The DOE conducted a concordance study on the Algebra I EOC and the PERT in 2013. See the attached memorandum announcing this concordance study.

**Recommendation:** The PERT should be retained as an option until another concordance study can be completed as was done in 2013.

According to the DOE presentation on the proposed rule, there was not a sufficient number of students who had taken the FSA Algebra I EOC and the SAT and/or the ACT. The DOE will reassess the use of the SAT and/or ACT comparative scores once these criteria are met (page 17).

**Recommendation:** Comparative scores using these two tests should be accelerated so that students have more options from which to choose. We should make every effort to ensure students have access to avenues that result in a standard high school diploma.

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Finally, access to the assessment and cost to the student and district must be considered. The PERT is given more frequently than the other assessments. The PSAT/NMSQT is only given in October for all 10<sup>th</sup> graders. If a student has to take it for concordant score purposes in the 11<sup>th</sup> or 12<sup>th</sup> grade the cost is the responsibility of the student in most situations. Therefore, access to a standard diploma becomes more limited for students who cannot make the necessary score on the Algebra I EOC. There is significantly more access with PERT. Cost is also a factor. The PERT costs less than a dollar per test and is therefore more financially feasible for districts to administer.

**Recommendation:** The options for students to obtain a high school diploma should be expanded before PERT is eliminated. Access to an alternative assessment for a concordant or comparative score should not be limited to once a year and should not be cost prohibited for students and school districts.

Thank you for reconsidering the recommendations relating to concordant and comparative scores and soliciting our input. Attached are documents submitted by individual districts and the memorandum concerning the PERT concordant score study.

If you have any questions, please give me a call.

Sincerely,



Malcolm Thomas  
President