The Every Student Succeeds Act gives states the flexibility to decide how to measure student success in high school. This guide—developed with the input of testing and state policy experts across the country and written by a former state assessment and accountability leader—is designed to elevate the trade-offs between using state- or nationally-developed assessments. The guide proposes a series of issues policymakers should investigate to determine which approach best matches state priorities.

The new federal law explicitly allows states to use a “nationally-recognized high school academic assessment” as their primary measure of high school performance; it also allows states to instead give districts the option of using one of these assessments in place of the state’s regular high school assessment. Nationally recognized assessments could include traditional college aptitude tests such as ACT or SAT or newer, collaboratively created tests such as PARCC or Smarter Balanced. Many students already take ACT and SAT in high school, alongside state tests, and some states even cover the administration fee.

In charting the right path forward, state policymakers will need to balance their interest in fewer state tests with their interest in high-quality state tests. Using only ACT and SAT in high school can streamline testing, but policymakers should probe deeper to make sure whatever test their state uses also matches up well with state goals and what educators want to learn from testing results. This guide surfaces four issues to examine:

1. What is most important for your state’s high school test to measure?
2. What should your state do to ensure high school test results are objective and valid?
3. What safeguards are needed to maintain the right amount of state authority?
4. What policies should your state insist vendors follow to advance equity?

The High-Quality Assessment Project (HQAP) sponsored the development of this guide. HQAP is an initiative to support state leaders as they put in place assessments that better measure the problem-solving, critical thinking and writing skills that students need for success after high school. In its entirety or in pieces, the guide is available for state leaders and stakeholders to adapt and use in whatever ways are helpful.

Education First directs HQAP’s grantmaking and technical assistance.

Experts interviewed:
- Matt Gandal, Education Strategy Group (and formerly U.S. Department of Education)
- Shannon Gilkey, Education Strategy Group (and formerly Kentucky Council on Postsecondary Education)
- Dan Gordon, EducationCounsel
- Sara Heyburn, Tennessee State Board of Education
- Abe Krisst, Connecticut Department of Education
- Bethany Little, EducationCounsel
- Scott Marion, Center for Assessment
- Scott Norton, Council of Chief State School Officers
- Alissa Peltzman, formerly Achieve, Inc.
- Ryan Reyna, formerly Delaware Department of Education
- Sheila Schultz, HumRRO
- Vince Verges, Florida Department of Education
- Jack Warner, Education Strategy Group (and formerly South Dakota Board of Regents)
- Judy Wurtzel, Charles and Lynn Schusterman Family Foundation
High school testing: What’s changed and what’s required?

The Every Student Succeeds Act (ESSA), like its predecessor No Child Left Behind, continues to require states to assess students in math and English language arts once in grades 9 through 12, and in science once in grades 10 through 12. States also are still required to use those results, along with other data, to inform the supports and any interventions they provide struggling schools. However, the new law now provides states the option of allowing school districts to assess students on a state approved “nationally-recognized state assessment” instead of a state-designed assessment.

In order for states to use a nationally-recognized assessment as their primary high school test, federal law requires them to confirm the new test:

- Is aligned to the state’s academic content standards
- Addresses the depth and breadth of the state’s standards
- Is equivalent in its content coverage, difficulty and quality to the state-designed assessment it would replace

The state must also certify that the new assessment provides “comparable, valid and reliable data,” meets technical requirements, and can be used to differentiate the performance of students across schools.

As part of its process to implement ESSA, the U.S. Department of Education engaged in a formal negotiated rulemaking process with a committee of education stakeholders to try and seek rough agreement on many issues related to state assessment. In mid-April, department leaders and committee members agreed on draft regulations to guide the use of national assessments in high school. The two major elements of this agreement include:

- “Nationally-recognized state assessment” is defined as “an assessment of high school students’ knowledge and skills that is administered in multiple states and is accepted by institutions of higher education in those or other states for the purposes of entrance or placement into courses in post-secondary education or training programs.”
- States are responsible for providing students in special education and English-language learners with the accommodations they need for any test taken during the school day for accountability purposes.

Experts agree that both ACT and SAT, as well as the two consortia assessments, the Partnership for Assessment of Readiness for College and Careers (PARCC) and the Smarter Balanced Assessment Consortium (Smarter Balanced), will all likely qualify as “nationally recognized” under this definition, provided they are being used for college admissions or placement. Other assessments could also qualify, though regulations require that school districts administer the chosen high school assessment to all students.

Which states use ACT and SAT currently and for what purposes?

A spring 2016 Education Week survey revealed that 21 states require students to take ACT or SAT at some point in high school—primarily to advance the goal of increasing college-going rates and not necessarily for school accountability. ¹

Recognizing these different goals, states in most cases are still using two tests to measure student progress in high school, including a state test to measure achievement and ACT or SAT to measure college readiness. The state tests for measuring achievement include state-developed assessments, ACT Aspire’s early high school test, or one of the two consortia assessments. These different state tests are administered in grades 10 or 11 (or in a few cases both grades).

¹ In addition to the 21 states requiring students to take either ACT or SAT to measure college readiness, three states ask students to choose either the ACT/SAT or the WorkKeys career-ready assessment: Alaska, Idaho and North Dakota.

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However, some states are beginning to use ACT or SAT testing in a more significant way. This school year, nine states are relying only on these college aptitude tests in high school: Connecticut, Delaware, Kentucky, Maine, Michigan, Montana, New Hampshire, Wisconsin and Wyoming.²

PARCC and Smarter Balanced tests have been designed to measure student achievement against standards and to suggest whether students have the skills and knowledge needed for success in entry-level college courses. Still, a handful of the 21 states participating in one of these consortia are now opting to use these common tests only for grades 3-8 and to choose a different test for high school. These states include four states from the list above that are now using ACT or SAT (Connecticut, Delaware, Montana and New Hampshire) and two states that are using their own state-developed test in high school (Colorado and Nevada).


### What are the potential trade-offs in switching high school assessments?

Described below are four big-picture issues—what high school tests measure, how the results will be used, what control a state wants to have and whether testing is fair for all students—that policymakers should examine.

For each of these issues, the guide suggests a series of follow-up questions for policymakers to ask as they contemplate the right number of tests their state should administer and what information they want to

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² New Hampshire is using a waiver from federal law to test a new approach to accountability and assessment. There, most high school students take the SAT test in for school accountability purposes; however, in pilot districts, teacher-developed, performance assessments measure high school student performance instead.
make sure state tests provide. In answering these questions, state leaders can engage educators, higher education leaders, parents and students to help identify pros and cons for different testing approaches.

Starting questions state leaders should answer:

- What tests does the state require in high school and in which grades? What are the costs of each, and what is each designed to measure?
- What additional high school tests do the largest school districts in our state require?

ISSUE #1: Aptitude vs. Achievement

What is most important for your state’s high school test to measure?

All assessments are designed with a specific purpose in mind. Assessment experts caution that assessments designed for one particular purpose may not be valid for another purpose. In high school, assessments are typically designed either to predict students’ likelihood of success in college or to assess their content knowledge (what they’ve learned while in high school).

Assessments that are designed to predict students’ success in college, such as ACT and SAT, are known as aptitude tests. These tests predict college success by assessing knowledge and skill in a variety of content areas. In addition to being a factor in admissions decisions, some higher education institutions also use the results to decide if students can take credit-bearing courses or need more remedial courses first.

On the other hand, assessments aimed at determining a students’ content knowledge or skill—the sorts of tests states have traditionally required of high school students and what PARCC and Smarter Balanced were designed to do—specifically measure what and how much students have been learning in school. These assessments also are designed to be used for student grades, teacher evaluation, accountability systems and to help determine whether college-bound students are ready for first-year classes. States usually have designed their state tests themselves, to ensure they measure what the state values.

In addition, PARCC and Smarter Balanced are designed to provide an early indication of whether students are on track for readiness for college or careers—so educators can target instruction and supports to help more students before they graduate. Providing a package of aligned annual tests starting in elementary school, PARCC and Smarter Balanced aim to provide information to help students improve their readiness at each step, rather than waiting until grade 11, and to measure student growth from grade to grade.

Questions state leaders should answer:

- What do our state tests measure in high school—and do ACT or SAT measure the same things?
- How well aligned are any of our options—existing state tests, PARCC, Smarter Balanced, ACT or SAT—to the knowledge and skills we expect high school students in our state to learn? How do we know, and is the analysis rigorous and independent?
- How important is it for our elementary and middle school tests and our high school tests to be aligned and connected—so they’re painting a consistent story and providing consistent information about student academic growth throughout K-12?
- What information about student performance in high school will be most useful to teachers and principals? Parents? Students themselves? What do we expect stakeholders to do with the results?
- How do different test options balance easy-to-score multiple choice questions with more extensive, complicated performance items that expect more writing and critical thinking?
- How do public higher education institutions in the state use ACT and SAT scores? Would they accept
scores from other tests to inform admissions or placement decisions?

What data do teachers want from state tests in high school to improve instruction?

ISSUE #2: Fairness and Transparency
What should your state do to ensure high school test results are objective and valid?

Demonstrating any test is valid for the purposes for which it will be used—in this case, measuring the performance of all high school students—is essential. One way test results used in an accountability system must be valid is by accurately measuring and reporting the performance of all students, including those at the lowest and highest ends of the performance spectrum.

State-designed high school assessments—along with PARCC and Smarter Balanced—are designed to measure student performance against state standards and to capture high, medium and low levels of student performance. In contrast, aptitude assessments such as ACT and SAT are not necessarily designed to measure state standards nor to capture the range of performance from lower and higher achieving students.

In addition, an industry of vendors, websites and coaches exists to help students increase their ACT and SAT test scores. While SAT is pioneering a new relationship with Khan Academy to provide free student support, many of options remain expensive and more accessible to wealthier students. They also focus more on test preparation over strengthening academic knowledge and skills.

ISSUE #3: State Control
What safeguards should you put in place to maintain the right amount of state authority?

States exert various levels of control over the design, content and policies related to state testing, which are reflected in the oversight they provide and the contractual obligations they require of assessment vendors. States that design their own assessments—including those that participated in creating PARCC and Smarter Balanced—have authority over all these elements. In addition, for state-specific tests, state department of education staff, state board members and often teams of educators are actively involved in the design of the assessment and/or the review of all test questions.

National assessment vendors such as ACT and SAT typically have not involved state education agency staff or significant numbers of an individual state’s teachers in the design of or selection of content for their assessments—because these assessments serve as national aptitude and college entrance exams, not as state-specific assessments.

Questions state leaders should answer:

- Who has access to and control over sensitive student data collected as part of students taking the test? Does the state have ultimate say over who can and can’t receive individual student data?
Who will determine key logistical issues such as when schools can administer a test, the responsibilities of school staff in administration, and what test security measures should be in place?

Were educators in our state—including both K12 teachers and higher education faculty—involved in crafting and reviewing test questions?

What opportunities do our educators have to inform (and help improve) the test moving forward?

How is the test scored? Are there opportunities for our state’s teachers to be involved in some fashion, or to have access to examples of student work on actual questions to inform their teaching practices?

Were educators and/or parents in our state involved in designing the reports that explain how students perform?

How quickly will the vendor return assessment results to the state? To educators? To parents?

ISSUE #4: Accessibility for Different Student Populations
What policies should your state insist vendors follow to advance equity?

States that design their own tests typically determine policies for administration, including how to make accommodations for students with disabilities and English-language learners. In addition, recognizing the goal is to measure what students know and can do, many state tests—including PARCC and Smarter Balanced—are not timed, with students having as much time as needed to do their best work.

National assessment vendor accommodation policies can differ from state policies, which usually allow more flexibility for students with special needs. These differences can affect how student test scores can be used. For example, if assessment vendors offer few accommodations or if they do not take into account educator judgment about what accommodations individual students reasonably need to show what they know and can do, it is possible that results for students who need but are not granted accommodations will not be valid or fair for state accountability purposes. On the other hand, if students are allowed broader accommodations on a national assessment, colleges may not use the score for admissions and placement.

The College Board, which publishes the SAT, has begun working with states that have adopted this test for accountability purposes to adjust its policies to better accommodate the needs of specific populations. It is unclear whether ACT has made similar changes to address state needs. Draft federal regulations for ESSA implementation suggest any nationally recognized assessment that states use will need to offer accommodations for special populations of students.

Questions state leaders should answer:

What accommodations are currently available/offered to students with disabilities and English-learners when they take state tests?

Should state tests be timed or un-timed?

Are there differences between the accommodations we offer to specific populations of students who take our current test and accommodations that are allowed by any nationally recognized assessment vendor we are considering?

If students use any of these same state-proscribed accommodations on the ACT or SAT, will the y still receive a score they can use for college admissions or placement decisions?

How will any changes in these policies impact students in our state?

About the author
Erin O’Hara has spent more than 15 years developing her expertise in state education policy. Most recently, Erin created and led the division of Data and Research as an assistant commissioner at the Tennessee Department of Education, working under Governor Bill Haslam and Commissioner Kevin Huffman. In that role, Erin managed the department’s work on assessment, accountability, data quality and research. Prior to her role as the department, Erin served as a policy advisor to Governor Phil Bredesen, working as a lead on Tennessee’s winning Race to the Top application.

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