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PROVIDENCE SCHOOL BOARD

March 11, 2013

Ms. Eva Marie Mancuso
Chairwoman
R.I. Board of Education
225 Westminster Street
Providence, RI 02903

Dear Chairwoman Mancuso,

School districts across Rhode Island have been analyzing their 2012 NECAP data to determine the magnitude and impact of the new NECAP graduation requirement on their current cohort of 11th grade students. As you know, the graduating class of 2014 is the first to have this graduation requirement, of scoring at least a Level 2, used to determine each student's eligibility to receive a diploma. In Providence, our data indicates that as many as 1,000 students in grade 11 are at-risk of not receiving a diploma next year. Providence, like many other school districts, has a tremendous challenge ahead of us.

Providence has responded by proactively taking on this challenge with all due urgency. As a district, we recognize that we must better prepare our students to meet the new graduation requirements. As an immediate response, we have launched the Graduate Providence Campaign. This is a community-wide campaign designed to heighten awareness among Providence students and families, and provide necessary supports and resources to ensure that all of our students are successful in meeting the new requirements. Mayor Taveras, the Providence School Board, and Superintendent Susan Lusi have all committed themselves to galvanizing our entire community around our students and providing them every opportunity to succeed.

The Providence School Board stands behind our students and resolutely supports them in their efforts to meet the graduation requirements; however, we disagree in principle with the use of the NECAP test as a graduation requirement. According to the guidelines promulgated by the test developer in the Guide to Using the 2012 NECAP Reports (p. 6), the NECAP was designed to, *"provide detailed school-level results and accurate summary information about individual students. NECAP was not designed to provide, in isolation, detailed student-level diagnostic information for formulating individual instructional plans. However, NECAP results can be used, along with other measures, to identify students' strengths and weaknesses. NECAP is only one indicator of student performance and results of a single NECAP test administration should not be used for referring students to special education or for making promotion and/or graduation decisions."*

In the other NECAP states, Vermont uses NECAP for NCLB accountability purposes but not for graduation decisions. Maine only uses the NECAP in grades 3-8 for NCLB accountability purposes and does not use NECAP with students in grade 11. In New Hampshire, graduation requirements are an LEA decision. Other than Rhode Island, no other NECAP state uses NECAP as a state-wide graduation requirement. It is our belief that NECAP was designed to serve as an aggregate measure of adequate yearly progress and NCLB accountability at the school and district level. Thus, assigning a consequence to the individual student, such as the denial of a diploma, is an inappropriate use of the NECAP results. This misuse of the NECAP results as a graduation requirement is potentially injurious to thousands of Rhode Island students and the communities in which they live.

As a matter of policy, the value of Rhode Island's adoption of conjunctive versus compensatory graduation system is debatable; however, having already adopted such a system, it is essential that an appropriate assessment instrument be used as an accurate measure of a student's readiness to graduate. In the regulations promulgated March 3, 2011, the Board of Regents states that "*LEAs are authorized to grant waivers from the state assessment requirement set forth in this section only in those rare cases in which the state assessment is not a valid means of determining the proficiency of individual students.*" We would therefore argue that, given the design and intended use of the NECAP test, it is not a valid means of determining whether any student should graduate. In seeking a standardized, and directly comparable statewide measure of student achievement in the subjects of reading and mathematics, it is our judgment that the NECAP was selected as a matter of convenience even as it was known to expire in another two school years. It is our position that the state should have adopted a set of appropriate assessments for determining whether a student had demonstrated sufficient proficiency to earn a high school diploma as the conjunctive graduation policy was adopted.

For these reasons, the Providence School Board urges the R.I. Board of Education to reconsider its use of the NECAP test as a graduation requirement. We believe that revisiting this particular requirement is duly warranted.

Thank you for your consideration.

Respectfully,



Keith A. Oliveira

President

Providence School Board

Cc: Governor Lincoln Chafee
Commissioner Deborah Gist
Mayor Angel Taveras
House Speaker Gordon Fox
Senate President Teresa Paiva-Weed