

Board of Education Agenda Item

Item _____ M. _____

Date: September 22, 2011

Topic: Report on the Proposed Standard Setting Timeline for the New Mathematics Tests Scheduled for Implementation in 2011-2012

Presenter: Mrs. Shelley Loving-Ryder, Assistant Superintendent, Division of Student Assessment and School Improvement

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Origin:

_____ Topic presented for information only (no board action required)

Board review required by

_____ State or federal law or regulation

_____ Board of Education regulation

_____ Other: _____

Action requested at this meeting Action requested at future meeting: _____ (date)

Previous Review/Action:

_____ No previous board review/action

_____ Previous review/action

date _____

action _____

Background Information:

In 2011-2012 a number of new assessments based on the mathematics Standards of Learning (SOL) adopted by the Virginia Board of Education in 2009 will be administered to Virginia students. A summary of the new assessments follows:

- **Standards of Learning (SOL) tests in grades 3-8 mathematics, Algebra I, Geometry, and Algebra II**
- **Virginia Modified Achievement Standards Tests (VMAST) for grades 3-8 mathematics and Algebra I:** VMAST is an alternate assessment designed for students with disabilities identified under the Individuals with Disabilities Education Improvement Act of 2004 (IDEIA), who are instructed in grade level content but are not likely to achieve proficiency in the same time frame as their nondisabled peers.
- **Virginia Alternate Assessment Program (VAAP) in mathematics for grades 3-8 and high school:** The VAAP is a work sample-based assessment designed for students with significant cognitive disabilities who are unable to participate in the Standards of Learning (SOL) assessment program even with accommodations. In 2011-2012, VAAP Collections of Evidence for mathematics will be prepared using new Aligned Standards of Learning based on the 2009 mathematics SOL but reduced in depth and complexity.

Because of the changes in the content measured by the SOL tests and VAAP, new passing scores must be adopted by the Virginia Board of Education. Further, because VMAST will be administered for the first time in spring 2012, the Board must also adopt passing scores for these new tests.

In addition, the *Regulations Establishing Standards for Accrediting Public Schools* (SOA), require that students with disabilities who are pursuing the Modified Standard Diploma “shall pass literacy and numeracy competency assessments prescribed by the board.” In the *Guidelines for Implementing Certain Provisions of the Regulations Establishing Standards for Accrediting Public Schools in Virginia*, the Board identified the grade 8 Standards of Learning (SOL) assessments in reading and mathematics as the literacy and numeracy assessments for the Modified Standard Diploma. Because the content of the grade 8 SOL mathematics test has changed, new cut scores that represent the minimum performance necessary to meet the numeracy requirements for the modified standard diploma will also need to be adopted.

Consistent with the process used since the inception of the SOL testing program in 1998, committees of educators will be convened to recommend to the Board of Education (BOE) minimum "cut" scores on the new mathematics assessments described above. The recommendations of these committees will be presented to the Board for review and final adoption of cut scores for the various achievement levels.

Summary of Major Elements:

The table below summarizes the preliminary timeline for standard setting activities related to the new mathematics assessments being implemented in 2011-2012.

Assessment Program	Standard Setting Committee Meeting	First Review of Recommended Cut Scores by the BOE	Adoption of Cut Scores by the BOE
End-of-Course SOL Mathematics Tests (Algebra I, Geometry, and Algebra II)	November 1-3, 2011	November 17, 2011	January 12, 2012
Grades 3-8 Mathematics Tests	January 31-February 2, 2012	February 23, 2012	March 22, 2012
VMAST Grades 3-8 Mathematics Tests and Algebra I	March 2012	April 26, 2012	May 24, 2012
Grade 8 SOL Mathematics Test When Used to Verify the Numeracy requirements of the Modified Standard Diploma	March 2012	April 26, 2012	May 24, 2012
VAAP mathematics for grades 3-8 and High School*	April 2012	May 24, 2012	June 28, 2012

*At the June 2011 meeting, certain Board members expressed concern that they were asked to waive first review and adopt the cut scores for VAAP in the area of writing and history. Department staff were asked to investigate changes in the existing procedures that would support the presentation of future cut scores for VAAP to the Board on both first and final review. In response to this request, a schedule for the review of the mathematics VAAP that allowed for the cut scores to be reviewed twice by the Board before they were adopted was developed. This proposed timeline was shared with Board members in July 2011. A copy of the schedule which has been updated to include the proposed Board meeting dates for 2012 is presented in Attachment A. In addition a summary of the feedback school

divisions provided in response to the proposed VAAP schedule is provided in Attachment B.

Superintendent's Recommendation:

The Superintendent of Public Instruction recommends that the Board receive the report and provide the Department with guidance as to how to proceed with finalizing the standard setting timeline for VAAP in the area of mathematics.

Impact on Resources:

N/A

Timetable for Further Review/Action:

N/A

Proposed 2011 – 2012 Virginia Alternate Assessment Program (VAAP) Schedule

Task	2012 Schedule (Proposed)
School Divisions Ship VAAP Collections to Pearson	March 7
Pearson Scores Collections for Mathematics	April 4 - 13
Pearson Scores Collections for Reading, Writing, Science, and History	April 14 - June 22
Standard Setting Committee Meeting	April 24 - 26
Board Receives Recommended Cut Scores for Mathematics on First Review	May 24*
Board Adopts Cut Scores	June 28 *
Preliminary Reports Available – Reading, Writing, Science and History	July 9
Preliminary Reports Available for Mathematics	July 26

*These dates are based on the proposed meeting dates for 2012.

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
Prince George County Public Schools	Jim Brown Director of Special Education	I am writing to express my concern over these changes in VAAP scoring procedures. IEP teams are already being pressed to complete instruction to accommodate assessment schedules now. This proposal removes a quarter of the instructional year for most children involved in the VAAP process. I would prefer to see the calendar pushed back into the summer if necessary for scoring and reporting of results.
Augusta County Public Schools	Gordon H. Mowen Supervisor for Assessment and School Counseling	<p>The concern expressed by the Board about waiving the first review of cut scores is understandable. They want to carefully consider their action. However, I would ask that the impact of the proposed schedule on teachers and students be considered. As we have worked with teachers to choose standards to assess for VAAP collections, we have stressed that the standards chosen should reflect reasonable or adequate progress from the beginning of the year, after a year of instruction. We ask them to assess student achievement at the beginning of the year and choose standards that require reasonable progress over a year of instruction. We emphasize not choosing standards that the student has already achieved or are easily reached with minimal instruction.</p> <p>A shipping date of March 7 would require that collections be complete after only about 23 weeks of school, not much more than 1/2 of the school year. Our direction to teachers would then need to be to choose standards or learning targets that reflect progress over about 1/2 of a school year. If our goal is to measure student growth and evaluate teachers based on that growth, it seems that progress ought to reflect a year of instruction rather than just a major fraction of a year.</p>
Rappahannock County Public Schools	Carol Johnson Director of Special Services	The March deadline will be extremely hard to meet! The students we have doing VAAPs are seriously delayed and often unmotivated to complete the portfolio. Further, January and February often result in missed school days and chaotic schedules for students who can only perform with routine and consistency. Please reconsider the May deadline for submission!!
Wise County Public Schools	Matt Hurt Director of Curriculum and Instruction	<p>The proposed timeline would cause great several problems for our school division.</p> <ol style="list-style-type: none"> 1. Our teachers spend all year collecting evidence for the VAAP. Earlier due dates would require our teachers to complete a year's worth of assessment work within two less months. 2. Some of our students require the full school year to show mastery on certain skills. Two less months of instruction could result in fewer skills mastered, thus lower pass rates on the VAAP

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
Amherst County Public Schools	Jim Gallagher Supervisor of Student Services	I have significant concerns with moving the submission date for VAAP Collections of Evidence from May to early March. As it currently stands, divisions must request that case managers submit collections of evidence well in advance of the SOL testing window resulting in a reduction in authentic instructional time for students with Significant Cognitive Impairments. Though they are being instructed toward aligned standards, their instructional time assessed by the VAAP should be considered with comparable value to that of any other student. By requiring divisions to submit collections in early March, you further devalue the instructional opportunities and quality instructional time provided to these students and make the process more about getting beyond a test. If the purpose of this considered change is to assist in the process of reporting, then it makes sense. If the decision has anything to do with the provision of effective instruction and quality educational programming, it makes no sense at all. Thank you for considering my input as you make this decision that stands to have dramatic impact on instruction and assessment of students with significant cognitive impairments.
Alexandria City Public Schools	Jane M. Quenneville, Ed.D. Director of Special Education	Dear Student Assessment. I am strongly opposed to an early submission for the VAAP collection of evidence. This population is our most needy and requires as much time as possible available in order to demonstrate their understanding of the ASOLs. This decision would never be considered for the SOLs or any other testing format for the Commonwealth of Virginia. Please reconsider the early submission date for the VAAP.
Hopewell City Public Schools	Antonia Greene	This timeline is ridiculous and an outrage!! Need I remind you all at DOE that VAAP portfolios are for students with significant cognitive delays. Where is the fairness and equity in this assessment timeline for them? Is the education of students with significant impairments a joke to you? Are VAAP's a joke? I take both very seriously (and the students do as well) and am wondering what level of achievement and proficiency you expect students to demonstrate on any test/assessment after what amounts to half of a school year. As a self-contained teacher, following this timeline, I would be expected to complete portfolios for 8 to 10 students with each portfolio containing evidence in five subject areas and seventeen ASOL's in less than 6 months. Remember, we are talking Alternate Assessment - not multiple choice tests. In fairness to students and teachers, you need to rethink this timeline. The general education students don't take SOL's until May.

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
Mathews County Public Schools	Nancy B. Welch, M.S., Ed.S. Assistant Superintendent	<p>With this schedule our division will need to set a local due date, <u>at the latest</u>, of February 24th. This represents approximately twenty two weeks of instruction. Twenty two weeks is not representative of even a majority of the 2011-2012 school year. VAAP content should contain evidence based on a full year of instruction-NOT twenty two weeks worth.</p> <p>Mathews County has made every attempt to align the VAAP and VGLA schedules with the regular administration dates as to provide a fair and equal balance between our special needs populations and regular education. The proposed schedule completely undermines this.</p> <p>Obviously we will support the VDOE's decision regarding the schedule; however, this places localities in a very awkward position. All of our students who participate in the VAAP will need to have addendums to their IEPs as notice to the parents of the change in the program schedule. Although this may not be mandatory in the eyes of the state, it will be for our locality as the collection of evidence will not be representative of the 2011-2012 instruction programs.</p>
Bedford County Public Schools	Janenne Daniels-Bosher, M.Ed. Lead Teacher for Special Education Data and Assessment	<p>Very concerned about the proposed change to the VAAP schedule. This proposed change would move up the due of these collections by 2 months over any other students in buildings, including regular students taking MC SOLs or other alternate testing completed. VAAP students will lose two months of instruction in order to complete the tasks required for these collections by this March due date. Many of these students need a longer time span to complete activities and yet we will now be giving them less. Also weather may or may not be a factor. If we have a harsh winter and miss a lot of school in January and February – it will be difficult to complete all activities necessary for some collections. For example, two years ago we missed a large amount of days mostly in January and February or did not come to school on time many days. This proposed change does not take that into account and allow for any makeup time should this occur.</p> <p>This proposed change is unfair to a population of students that needs as much time as we can give them to show the material that they have learned. <u>March 7th is too soon for VAAP collections to be due.</u></p>
Orange County Public Schools	R.P. "Bob" Grimesey, Jr., Ed.D. Superintendent	<p>Dr. Wright: Thank you for bringing this matter to our attention. Thanks also for inviting our feedback. I have evaluated the proposed timeline with our staff. We have concluded that it would NOT be appropriate to cut off VAAP collections of evidence earlier than May 1. Moreover, an early March state cut off would necessitate a local cut off in late February. Late February is only a few weeks into the second half of the school year. It is difficult to believe that a child's total academic progress can be measured reliably after only 55%-60% of the school</p>

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
		year. We understand the need for a reasonable cut-off, but early March is not reasonable. Let me know if any further rationale is necessary. Kind regards. –
Alleghany County Public Schools	Sarah T. Campbell, Ph.D. Superintendent	It is a shame that students with significant cognitive disabilities will likely have to complete the VAAP collection in six weeks less time than they currently have been allotted. This does not make sense for students who typically need more time for teaching and learning.
Loudoun County Public Schools	John V. Panettieri DDOT Office of Testing Services	A Due Date of March 7 th to ship VAAP COEs to Pearson is a loss of two months compared to the ship date for 2010-2011, and is just not reasonable. Teachers would have to complete the COEs by mid-February to allow time for prescoring, review of the COEs by their School Test Coordinator, and then processing these COEs through the office of the Division Director of Testing. Because of Thanksgiving and Winter Break we lose two weeks, and then there is possible additional time lost due to snow days. To expect teachers to begin the process in October, which is when most teachers seriously start work on the VAAP Collections of Evidence, and then be finished by mid-February, while losing a significant number of days in the middle, is not a realistic proposal. I would anticipate that if this schedule is adopted, then many of the VAAP Collections of Evidence submitted will be of poorer quality than if teachers were allowed adequate time to complete them.
Prince William County Schools	Paul F. Parker, PhD Supervisor of Testing	Our assessment team has discussed the proposed time line and we believe it would be challenging to accommodate at the division level. The biggest reason for our recommendation has to do with our teachers' ability to provide appropriate instruction in the shortened time frame. We speculate this could create an inequitable 'assessment' environment, as well as preclude a student from demonstrating proficiency levels he or she otherwise would under different circumstances. The other issue might be the impact 'available' student proficiency level data might have on establishing and then applying passing standards, depending upon the process being used. Consequently, our recommendation would be to replicate the time line adopted during the 2010-11 school year, if at all possible. We sincerely thank you for the opportunity to provide feedback and look forward to a decision soon. Have a great day.

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
Alexandria City Public Schools	Clinton Page Department of Accountability	<p>Hello everyone,</p> <p>I have significant concerns regarding the proposed 2011-12 VAAP timeline. In all education policy decisions the quintessential question must be "What is best for the students?". I understand the board's desire to not waive first review; however, if the only way to accomplish this task is to move the VAAP shipment deadline two calendar months earlier I strongly urge the board to relent in their request or explore other avenues that do not directly impact our students.</p> <p>This shift would decrease the instructional time of VAAP students to demonstrate ASOL proficiency by 34 school days. This would be a reduction of 22% of the instructional days available to our VAAP students compared to the 2010-2011 VAAP schedule. I fear this reduction would force teachers into selecting lower level ASOLs, and the VAAP collections would no longer represent the student's achievement over a school year but closer to half a school year.</p> <p>These are my quick thoughts to the proposed schedule. As we always strive for equity across all students, I ask if the same scenario were to play out for SOL testing would the solution be to move SOL testing forward two months? I understand the flexibility in selecting ASOLs, but our stance in ACPS has always been to select the most rigorous ASOLs possible for individual students and build towards that goal throughout the school year.</p> <p>Thank you for your time and consideration,</p>
Lunenburg County Public Schools	Dora G. Wynn Division Superintendent	<p>We are extremely concerned with the early shipment date to Pearson of the 2011-2012 VAAP Collections. It appears that Math is most crucial in that cut scores must be set.</p> <p>Perhaps, Math should be an earlier submission (February 1, 2012) than the other VAAP content areas.</p> <p>Our school year will end on May 24, 2012. It is imperative that we are allowed enough time to instruct and document the ASOL's that are being taught.</p> <p>Thank you for giving this concern serious consideration.</p>

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
Hanover County Public Schools	Carole Urbansok O'Brien, Ph.D. Director of Counseling, Testing & Research	<p>Thank you for soliciting input from the schools on this critical question. We've gathered the following comments to support the position that this timeline is not in the best interest of students and their ability to demonstrate their learning, which is first and foremost the imperative of good assessment.</p> <p>Some general timeline implications to consider</p> <ul style="list-style-type: none"> • March 7 is Wednesday (prompt day) of the SOL Writing test week: STC and teacher time during SOL Writing test • Events immediately preceding the SOL Writing test week including: <ul style="list-style-type: none"> ○ Mandatory online Writing Field Test (on or around February 22-23) <p>Is it realistic to expect VAAP students, teachers, and building administrators to be able to produce valid, comprehensive, quality collections in this shortened instructional year (essentially Sept 6 to March 1)? --this is some <u>2 months less of instructional time</u> than previously available.</p> <p>Can STCs and others realistically manage to finalize and submit collections for shipment by March 7 given other test-related tasks (and other responsibilities) requiring their attention at that time?</p> <p>There appears to be considerable time between the ship date, March 7 and the April 4-13 Pearson scoring date. Can this lag time for Pearson be shortened to provide school divisions an additional week or even 2 to complete and ship collections?</p> <p>Regarding instruction and student needs: This timeline does not allow time for appropriate instruction and adequate assessment for our most severely challenged population. If anything we need more time in order to bring them up to standards.</p> <ul style="list-style-type: none"> • Are we allowing the <u>convenience and a timeline of adults</u> to dictate instruction for children? • When parents learn of this, there will be an outcry and parents may feel that this practice is discriminatory. May this decision make the public think that the BOE is <u>not concerned</u> at all about this population of students? • V-tests have been promoted to <u>allow as much instructional time to complete collections as students taking regular SOLs have for instruction</u>. Doesn't this timeline undermine this intent? <p>The bottom line is that this timeline is severely cutting instructional time for our students.</p>

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
Carroll County Public Schools	Laura C. Goad, Ed. D. Director of Special Education	I am extremely discouraged by the tentative VAAP Schedule that would have the VAAP Collections shipped to Pearson no later than March 7, 2012. I would like to share the impact of this for our students with significant cognitive disabilities here in Carroll County. In order to ship by March 7 (which as you know is two months earlier than previous years) we would need to do any final internal reviews and pre-scoring the final week of February 2012. The past two years, we have missed about a month of school in either January or February. Therefore, teachers wanting to make sure there is sufficient evidence will need to have the collection completed prior to the winter weather. The impact of this is that the students with the most significant learning challenges will have the least amount of time (about a semester) to demonstrate what they have learned. This does not seem fair for these students. We are lucky here in Carroll that our students returned on August 10, 2011 -so guess we have a head start!
Powhatan County Public Schools	Kristin McLaughlin Assistant Superintendent for Special Education and Pupil Personnel Services	Thank you for asking for LEA's feedback on this important decision. We feel that the proposed timeline would negatively impact the student's opportunity to successfully complete the various ASOLs to their fullest potential. This is already a population of students who we know require additional time to master concepts. Unfortunately the limited time frames may force teachers to submit the minimal work samples instead of having the extra time to more thoroughly work on the skills and collect the samples to submit. It seems that by reducing the time frame to collect work samples we are actually shortening the time we expect students with more significant cognitive disabilities to master skills. Thanks

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
Franklin County Public Schools	Elaine Hawkins Coordinator of Assessments & Grants	<p>Shipping the VAAP Collections of Evidence by March 7, 2012, will be daunting for our students. By definition, the students who qualify have significant cognitive disabilities and require intensive and repeated instruction. Their disabilities require more time to complete their assessments and not less. Unbelievably, the board is asking students to complete the year's assessment in just a little over half the year. We would not presume to ask gifted students to do this.</p> <p>Students in Franklin County will need to complete most of the evidence for the ASOLs before the winter break in December as the weather can be very erratic in January and February. These students need the day to day consistency of instruction, but during the winter months it is sometimes difficult to provide it due to snow and ice storms. As bad weather is impossible to accurately predict, teachers will push to finish most of the evidence for the collections before winter break.</p> <p>It is understandable the board would like an opportunity to review the cut scores for math twice. The following are some suggestions to help make this possible.</p> <ol style="list-style-type: none">1. Allow school divisions to score reading, writing, science and history, submitting only the math portion of the collection to the state for scoring. In this way, the math could be submitted even as early as the first week of March, but students would have the additional two months to complete the evidence for the ASOLs for the other subjects.2. Collect the entire Collections of Evidence at the end of March. Pearson can hire additional people to score the collections during April, and the committee can meet early in May to make cut score recommendations before the board meets in late May. This would give our students an additional month of "stable" weather to complete the assessments.3. Suggest to the board that their demand of two opportunities to review cut scores is harmful to the very students who need the most time to learn and demonstrate their knowledge. Perhaps they can arrange an extra meeting early in June for the specific purpose of reviewing the cut scores of VAAP math. It is hard to believe the board would deliberately victimize these students for their own convenience.

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
Virginia Beach City Public Schools	Tracy A. LaGatta Director of Testing Office of Student Assessment	<p>The VAAP collection schedule is already compressed compared to the Standards of Learning (SOL) testing schedule. The proposed calendar would not provide sufficient time for teachers and students; it is a disservice to our student population. The level of performance for these students indicate the need for extensive and frequent direct instruction. More time is needed, not less, to sufficiently cover the material necessary to meet the Aligned Standards of Learning. We are working with students with significant disabilities that are performing at least three standard deviations below the mean. The rate of learning is much slower for this population of students.</p> <p>The proposed schedule would cut students and teachers time to work on standards down to approximately 110 instructional days between September and February (more than one month less instructional time than in the 2010-11 school year). Taking into account potential inclement weather days, adjusted dismissal days, and student illness, this timetable would put undue stress on students, teachers, and administrators, which may result in a negative impact on overall student performance. Neither students nor schools can afford the loss of instructional time prior to submitting this assessment.</p> <p>It is unreasonable to ask teachers to instruct and collect evidence in the ASOLs in roughly half the amount of time allotted to non-special education students for completing the SOLs. Each day that students and teachers have to work on standards is crucial to ensuring the best display of this unique population's abilities. This proposed schedule will mean that some content areas may be left incomplete or possibly not attempted at all due to the time constraints of this proposal.</p> <p>We also predict a negative parental response to this shortened collection window.</p> <p>The updated VAAP implementation manual recommends a number of pre-scoring steps to be taken prior to shipping COEs to Pearson. These steps have been taken in Virginia Beach for several years. Enacting these procedures within the shortened schedule means taking further instructional time away from students and teachers in order to conduct the strongly encouraged and necessary technical administrative reviews before turn-in.</p> <p>With all that is involved in instructing this student population, it is surprising that this schedule is even being considered. Shortening the collection window is not in our students best interest. Sincerely, The Virginia Beach Special Education and Assessment Team</p>

Comments on Proposed VAAP Schedule for 2011-2012

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Botetourt County Public Schools	Deborah S. Nemece Instructional Coordinator	<p>Teachers of students with significant cognitive impairments are having less than a full school year to collect info for the VAAP. Students will need to complete the majority of the evidence for the ASOLs prior to the winter break in December due to erratic weather patterns in January and February.</p> <p>Botetourt County concurs with Franklin County's concerns and suggestions as listed below.</p> <p>Students who qualify have significant cognitive disabilities and require intensive and repeated instruction. Their disabilities require more time to complete their assessments and not less.</p> <p>These students need the day to day consistency of instruction, but during the winter months it is sometimes difficult to provide it due to inclement weather. As bad weather is impossible to accurately predict, teachers will push to finish most of the evidence for the collections before winter break.</p> <p>It is understandable the board would like an opportunity to review the cut scores for math twice.</p> <ol style="list-style-type: none"> 1. Collect the entire Collections of Evidence at the end of March. Pearson can hire additional people to score the collections during April, and the committee can meet early in May to make cut score recommendations before the board meets in late May. This would give our students an additional month to complete the assessments. 2. Perhaps the board can arrange an extra meeting early in June for the specific purpose of reviewing the cut scores of VAAP math. 3. Allow school divisions to score reading, writing, science and history, submitting only the math portion of the collection to the state for scoring. In this way, the math could be submitted even as early as the first week of March, but students would have the additional two months to complete the evidence for the ASOLs for the other subjects.

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
York County School Division	Lisa Pennycuff, Ed.D. Departmental Director Accountability & Instructional Services	<p>Dear Dr. Shelly Loving-Ryder, Thank you for the opportunity to provide feedback on the proposed timeline adjustment for the Virginia Alternate Assessment Program (VAAP). Upon careful review of the proposed submission timeline, the York County School Division would like to share our concerns regarding the modified timeline. The proposed schedule movement of shipping evidence on March 7, 2012, requires an adjusted Division collection date of February 2012. The most significant result of the proposed timeline adjustment is that participating students must complete ASOL instruction with evidence documentation finalized within five months of the academic school year.</p> <p>VAAP participants, according to state definition, are students identified as having a significant cognitive impairment who demonstrate the need for extensive, direct instruction and/or intervention in a curriculum based on the Aligned Standards of Learning (ASOLs). Depending on the extent of the disability, students may also require instruction in the areas of personal management, recreation, leisure, school and community, vocational, communication, social competence and/or motor skills. Requiring this unique population of students to demonstrate performance on standards, although reduced in depth and complexity, comparable to their non-disabled peers with significantly less instructional time is not conducive to providing these students with the optimal opportunity to learn and demonstrate their knowledge of the standards. The final reduction amounts to a loss of 40 instructional days. Since results from this assessment are applied to AYP calculations, we strongly believe that each student should be provided with every opportunity to demonstrate their success under the most positive of circumstances.</p> <p>York County recognizes the demands of meeting state and federal guidelines for establishing cut scores for new assessments. However, the proposed timeline compromises the instructional timeframe for the student population with the highest level of need. Therefore, York County would like to offer two recommendations for your consideration. First, please consider reinstating the timeline implemented for Spring 2011 with the board reviewing cut scores twice in June which would allow for sufficient time for results to be applied to AYP calculations. If this is not possible, please consider a timeline submission for the VAAP for the end of April with board reviews of cut scores once in May and again in June.</p>

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
		<p>On behalf of the York County School Division, thank you again for this opportunity to share our concerns with you on the proposed timeline for 2012 and for your consideration of this information.</p> <p>Sincerely,</p>
<p>Arlington Public Schools</p>	<p>Karen Gerry Principal, Stratford Program.</p>	<p>Good morning, My name is Dr Karen Gerry and I am a principal of the Stratford Program with Arlington Public Schools. My school is APS' only school where all students have special needs and all VAAP. We live and breath the VAAP at my school. As a school, we are against the proposed change in VAAP schedule, this change is not in the best interest of children. With the proposed VAAP schedule each teacher would have one month to VAAP on each subject area: September - Science October - Math November Social Studies December - Writing January - Reading February - send portfolios to Center office</p> <p>My middle school teachers have 7 and 8 students per classroom. This proposed schedule is too rigorous for some of most disabled students within Arlington Public Schools. As you are aware, repetition is key for students with intellectual disabilities to learn a concept. This proposed schedule does not provide ample time for these students to learn the ASOLs. In the best interest of students, please leave the VAAP schedule the way it currently is. Please remember that education is about children, we need to do what is best for children and not what fits the schedule of the State Board of Education. If you would like to speak to me my number is 703-228-6443. Thank you.</p>

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
Henrico County	Yvonne B. Fawcett	<p>Virginia Department of Education Student Assessment</p> <p>Henrico County's Exceptional Education Department and Research and Planning Department have carefully reviewed the proposed VAAP submission timeline and are strongly opposed to the suggested submission timeline modification. The proposed movement of the VAAP Collection of Evidence to March 7, 2012, will require local educational agencies to adjust the collection date from schools to February 2012. The defacto result of this movement is the expected completion of an entire academic year's worth of ASOL instruction to be delivered and documented within a single semester.</p> <p>By VDOE definition, the population served by this alternate assessment is one composed of students with cognitive disabilities who require significant additional material and staffing support and more frequent, prolonged exposure and repetition to material to achieve mastery of content. The requirement for this student population to demonstrate mastery of a comparable volume of content, recognizing differences of depth, to their typically developing peers in a drastically reduced time frame is inappropriate and not in the best interest of students. The end result is a reduction of more than 40 days of instruction that will not be captured through our state student assessment system and a vastly reduced opportunity for our students and their families to receive accurate information regarding their child's performance in relation to the ASOL standards.</p> <p>HCPS is cognizant of the challenges faced by the board in reconciling their oversight responsibility in establishing cut scores and the timeframe for data collection. However, the compromise proposed imposes sacrifices only upon the student population with the highest level of established need. In recognition of the conflict, HCPS proposes that the board consider scheduling two meetings in June to resolve the issue. This compromise places more of the burden of resolving the conflict with the adults rather than on the students.</p> <p>In conclusion, HCPS unequivocally regards any compromise that results in reduced opportunities for students with disabilities to gain and demonstrate command of content as inappropriate and shortsighted. We appreciate the opportunity to provide input and look forward to a demonstration of the board's leadership in putting students first. Should you have any questions regarding HCPS' position in this matter, please contact Dr. Blumenthal, Director of</p>

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
		Research and Planning or Dr. Gibson, Executive Director of Exceptional Education.
Williamsburg-James City County	Karen L. Davis Supervisor of Special Education School Board and Central Office at James Blair	Good Morning, We are concerned with the new timeline because of the short period of time during the course of the school year for teachers to provide appropriate instruction and collect the evidence to prove mastery. Here in WJCC schools, we collect the portfolios several weeks before the scoring event to review them and provide feedback to our teachers. We return the portfolios with suggestions for improvement. We then collect them again for the scoring event. It generally takes us from 3 to 5 days to score. With this being the case, we will need to collect the portfolios in early February for review and staff will not have as long a time period to correct them. We will also only be reflecting a half of a school year's worth of instruction. This is equivalent to having students take SOLs in January for a year's worth of instruction. Thank you for the opportunity to provide feedback.
Falls Church City Public Schools	Juanita Briscoe	I have included responses from Special Education personnel in our schools. These comments are typical. Please regard as representative of sentiments from Special Education staff in Falls Church City. Thank you. – Please see the 3 responses below.
Falls Church City Public Schools	Liz Germer Director of Special Education and Student Services	Juanita – I am strongly opposed to this as are my colleagues in region 4. The region 4 special education directors are planning to attend the meeting on Sept 22 nd in Richmond to voice our concerns. I am also alerting our SPEAC committee. To me this is discriminatory against a group of students. They are expected to learn and be assessed on a full years worth of standards in basically half a year. What would happen if they said give SWD the SOLs in Feb or March and all gen ed kids in May! I believe we need to send a strong message to the board of ed.
Falls Church City Public Schools	Allison Moriarty	I completely agree with Liz. The speed at which these students acquire knowledge that is actually RETAINED is so much slower that cutting the time they have to learn makes NO sense.
Falls Church City Public Schools	Stephanie Ciskowski	I agree with Liz and Allison. The timeline to turn in the portfolios is way too early and does not give the students enough time to learn and retain the skills they are being assessed on. Also, as Allison stated below, their rate of learning is slower, so asking the students to complete assessments early in the spring is not in their best interest.

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
Norfolk Public Schools	Anh-Thy T. Nguyen, Ed. S. Sr. Coordinator/DDOT2	<p>Norfolk Public Schools would like to provide the following thoughts for consideration:</p> <ol style="list-style-type: none"> 1. 2011-2012 students in grades 9-11 will participate in VAAP. Our school division will need time for transition into this new procedure. 2. Students who have significant cognitive disabilities need the most time and intensive level of instruction to show mastery of an objective are being given LEAST AMOUNT of time to acquire the knowledge needed (VAAP). Students with significant cognitive disabilities are being required to demonstrate mastery of content material 2 months earlier than their non-disabled peers. 3. The new ASOLS in the area of mathematics are more rigorous than in previous years. There are more components of the ASOL to teach and demonstrate mastery than previously. 4. The March 7th date is the same week as the Writing SOL assessment. This could possibly cause a lot of confusion within our district. This puts schools and school districts in a very stressful situation and may be problematic, especially those with limited personnel and/or shared personnel in central administration and schools. This stretches already limited resources and divides attention among two very important state-mandated assessments. 5. Teachers at the upper elementary and middle school level typically have a large amount (8-10) students in their class who may be participating in VAAP. Teachers have to get more information in less amount of time to all included students. The quality of instruction could be compromised considering the students programs generally include self help, work preparation, community and other functional skills not included in the ASOLS. <p>Please let us know if you have any questions. Thank you.</p>
Shenandoah County Public Schools	Jaycee Bova Supervisor of Special Education Instruction & Services	<p>Leadership and educators in Shenandoah County are very concerned by the new proposed timeline requiring our teachers of students with intellectual disabilities to complete their VAAP collections 8 weeks earlier this year.</p> <p>Last year's ship date to Pearson of May 5th was well before the previous year's date of May 25th. This change took away from instructional time. Shipping the VAAP collections by March 7th this year will take an additional eight weeks away from instruction for this population of students.</p> <p>Two months of instruction will be lost with this new timeline. These students will be unable to show their academic growth made in an eight week period because their assessment will already be completed.</p>

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
		<p>We hope the State Board of Education will reconsider and give back time to teach our students with intellectual disabilities who are receiving the Aligned Standards of Learning (ASOL) curriculum and demonstrating academic progress with their VAAP collection of evidence.</p> <p>Thank you for your time,</p>
Shenandoah County Public Schools	Jeremy J. Raley, Ed.D. Assistant Superintendent for Administration and Finance	<p>I am very concerned by the new proposed timeline requiring our teachers of students with intellectual disabilities to complete their VAAP collections 8 weeks earlier this year.</p> <p>Last year's ship date to Pearson of May 5th was well before the previous year's date of May 25th. This change took away from instructional time. Shipping the VAAP collections by March 7th this year will take an additional eight weeks away from instruction for this population of students.</p> <p>Two months of instruction will be lost with this new timeline. These students will be unable to show their academic growth made in an eight week period because their assessment will already be completed.</p> <p>We hope the State Board of Education will reconsider and give back time to teach our students with intellectual disabilities who are receiving the Aligned Standards of Learning (ASOL) curriculum and demonstrating academic progress with their VAAP collection of evidence.</p>
Shenandoah County Schools	B. Keith Rowland Division Superintendent	<p>As Superintendent of Shenandoah County Schools, I am very concerned by the new proposed timeline requiring teachers of students with intellectual disabilities to complete their VAAP collections eight weeks earlier than last year. As a school division that adheres to Virginia Code 22.1-79.1.B and does not begin school until after Labor Day this will most assuredly create a greater hardship on our teachers and our students.</p> <p>Last year's ship date to Pearson of May 5th was well before the previous year's date of May 25th which certainly made for a significant loss of instructional time. With the new timeline shipping the VAAP collections by March 7th this year will take an additional eight weeks away from instruction for this population of students and result in two months of lost instructional time. Consequently, these students will be unable to show their academic growth made in an eight week period because their assessment will already be</p>

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
		<p>completed.</p> <p>I hope that the State Board of Education will reconsider this timeline and restore whatever time that is necessary to teach students with intellectual disabilities. These students will be receiving the Aligned Standards of Learning (ASOL) curriculum and demonstrating academic progress with their VAAP collection of evidence.</p> <p>Respectfully</p>
Virginia Beach City Public Schools	Karen M. O'Meara Assistant Principal Pembroke Elementary School	<p>My name is Karen O'Meara, and I am the assistant principal and special education coordinator at Pembroke Elementary School in Virginia Beach City Public Schools. Pembroke Elementary School is unique in that we service the largest population of children with disabilities (approximately 170 students) at the elementary school level in Virginia Beach. I have directed and supported our seven teachers of intellectually disabled children through the VAAP assessment process for their students in grades 3-5. On average, Pembroke Elementary School completes 25 VAAPs each year. I strongly oppose the change in the timeline for submitting VAAP binders two months in advance for the following reasons:</p> <ul style="list-style-type: none"> • By collecting VAAP evidence so far in advance of administering the SOL tests taken by regular education students, this proposal constitutes discrimination against special education students and, therefore, may warrant an investigation by the Office of Civil Rights. • Attendance is an issue especially with our medically fragile students. This limits the amount of time a teacher has to instruct the students and collect evidence of learning. • Students with significant cognitive, physical, and behavioral challenges need a greater amount of time to process and grasp concepts prior to testing. • We would be sacrificing the integrity of the learning environment to satisfy the personal convenience of the state school board members. • The strict format of the VAAP requires a great deal of time to gather and record evidence (planning and preparing the activity, taking pictures, typing narratives, and compiling all the pages for each objective). • The quality of work would most definitely suffer, and thereby, lower

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
		<p>the VAAP scores.</p> <ul style="list-style-type: none"> • Seven teachers share two color printers and a limited number of black and white printers. It is time consuming to travel from room to room to see if the pictures captured the mastery of a skill correctly. If not, the process must be repeated. • The already high frustration level of students, teachers, and parents would increase with the implementation of a stricter timeline. <p>I would like to invite members of the Virginia Department of Education and members of the Virginia Board of Education to visit the ID classrooms at Pembroke Elementary School to observe the complexity of this process given the amount of time and resources required to develop evidence on the alternate standards while meeting the goals of each student’s IEPs. Based on the negative impact this change would have on our intellectually disabled students, I strongly urge you to reconsider the proposed timeline.</p> <p>Sincerely,</p>
Shenandoah County Public Schools	Stacey Leitzel Director of Elementary Education	<p>Leadership and educators in Shenandoah County are very concerned by the new proposed timeline requiring our teachers of students with intellectual disabilities to complete their VAAP collections 8 weeks earlier this year.</p> <p>Last year's ship date to Pearson of May 5th was well before the previous year's date of May 25th. This change took away from instructional time. Shipping the VAAP collections by March 7th this year will take an additional eight weeks away from instruction for this population of students.</p> <p>Two months of instruction will be lost with this new timeline. These students will be unable to show their academic growth made in an eight week period because their assessment will already be completed.</p> <p>We hope the State Board of Education will reconsider and give back time to teach our students with intellectual disabilities who are receiving the Aligned Standards of Learning (ASOL) curriculum and demonstrating academic progress with their VAAP collection of evidence.</p>

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
Virginia Beach City Public Schools	Elizabeth A Jones Special Education Teacher Pembroke Elementary School	<p>Dear Virginia Department of Education Members: My name is Elizabeth Jones and I am a teacher of students with intellectual disabilities at Pembroke Elementary School in Virginia Beach City Public Schools. I generally complete 5 alternative assessments each year. I strongly oppose the change in the timeline for submitting VAAP binders two months in advance for the following reasons:</p> <ul style="list-style-type: none"> • By collecting VAAP evidence so far in advance of administering the SOL tests taken by regular education students, this proposal constitutes discrimination against special education students and, therefore, may warrant an investigation by the Office of Civil Rights. • Attendance is an issue especially with our medically fragile students. This limits the amount of time a teacher has to instruct the students and collect evidence of learning. • Students with significant cognitive, physical, and behavioral challenges need a greater amount of time to process and grasp concepts prior to testing. • We would be sacrificing the integrity of the learning environment to satisfy the personal convenience of the state school board members. • The strict format of the VAAP requires a great deal of time to gather and record evidence (planning and preparing the activity, taking pictures, typing narratives, and compiling all the pages for each objective). • The quality of work would most definitely suffer, and thereby, lower the VAAP scores. • Seven teachers share two color printers and a limited number of black and white printers. It is time consuming to travel from room to room to see if the pictures captured the mastery of a skill correctly. If not, the process must be repeated. • The already high frustration level of students, teachers, and parents would increase with the implementation of a stricter timeline. <p>I would like to invite members of the Virginia Department of Education and members of the Virginia Board of Education to visit my classroom at Pembroke Elementary School to observe the complexity of this process given the amount</p>

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
		<p>of time and resources required to develop evidence on the alternate standards while meeting the goals of each student's IEPs. Based on the negative impact this change would have on our intellectually disabled students, I strongly urge you to reconsider the proposed timeline.</p>
Arlington Public Schools	Patrick K. Murphy, Superintendent Alvin Crawley, Assistant Superintendent for Student Services Betty Schwoebel-Mills, Assistant Director for Assessment	<p>The proposal to move the deadline for vaap submissions up to early march is indeed problematic, both for our teachers and our students. It appears the decision to change the submission schedule is based on accommodating the state board rather than take into account the detrimental affect this would have on the vaap submissions by our students who are students with severe cognitive disabilities. These students struggle daily to achieve skills that will enable them to learn and grow. The proposed schedule would shorten the instruction time from 8 months to 6 months.</p> <p>As we all know, it takes much longer for students with a severe cognitive disability to learn even basic skills. This 25% reduction in instruction would be a disservice to our students. While school is not in session yet, we are confident that our teachers would not support this change. In recent years much stricter guidelines and rules for collecting student work for vaap portfolios have been put in place in order to comply with requirements of united states department of education. These requirements have increased the time it takes for teachers to assemble the necessary evidence for each student. It is important to note that the number of students in aps who qualify and participate in the vaap has been growing steadily. This has meant that many of our teachers are responsible for compiling more portfolios than in the past increasing their work load. In many instances, these extra hours are well outside their normal classroom time.</p> <p>We respectfully request that the state board take a second look at what they are asking of this special group of students and their teachers. In considering a change to the vaap schedule, we urge them to consider changing their schedule rather than adversely affecting students and teachers by reducing instruction, preparation and submission time.</p>
Grayson County Public Schools	Stephen C. Cornett Director of Instruction and Assessment	<p>We here in Grayson County Public Schools are very concerned about the early March deadline for sending in the VAAP COEs. Grayson County historically has a high number of days missed due to inclement weather often beginning in early December and lasting until the middle of March. Last year, most of December and January were missed. This puts both our students and teachers in a precarious situation. These VAAP children should not be discriminated against because of the extreme weather conditions that are usually prevalent in</p>

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
		<p>Grayson County. There should be some provision for an extension of this due date because of extreme circumstances such as severe weather postponements. We would appreciate any consideration by the Virginia Board of Education concerning this matter.</p>
<p>Virginia Beach City Public Schools</p>	<p>Janice Dintaman Pagano Special Education Teacher</p>	<p>Dear Virginia Department of Education Members: My name is Janice Pagano, and I have been teaching students with intellectual disabilities at Pembroke Elementary School in Virginia Beach City Public Schools for over twenty years. Each year I collect VAAP evidence for three to four students in grades 3-5 while continuing to work on individual IEP goals and objectives. My students have a wide range of significant disabilities that greatly impact their ability to grasp the concepts as outlined in the aligned standards of learning. At the same time I must also address the diverse physical needs of my students. I strongly oppose the change in the timeline for submitting VAAP binders two months in advance for the following reasons:</p> <ul style="list-style-type: none"> • By collecting VAAP evidence so far in advance of administering the SOL tests taken by regular education students, this proposal constitutes discrimination against special education students and, therefore, may warrant an investigation by the Office of Civil Rights. • Attendance is an issue especially with our medically fragile students. This limits the amount of time a teacher has to instruct the students and collect evidence of learning. • Students with significant cognitive, physical, and behavioral challenges need a greater amount of time to process and grasp concepts prior to testing. • We would be sacrificing the integrity of the learning environment to satisfy the personal convenience of the state school board members. • The strict format of the VAAP requires a great deal of time to gather and record evidence (planning and preparing the activity, taking pictures, typing narratives, and compiling all the pages for each objective). • The quality of work would most definitely suffer, and thereby, lower the VAAP scores. • Seven teachers share two color printers and a limited number of black and white printers. It is time consuming to travel from room to room

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
		<p>to see if the pictures captured the mastery of a skill correctly. If not, the process must be repeated.</p> <ul style="list-style-type: none"> • The already high frustration level of students, teachers, and parents would increase with the implementation of a stricter timeline. <p>I would like to invite members of the Virginia Department of Education and members of the Virginia Board of Education to visit the ID classrooms at Pembroke Elementary School to observe the complexity of this process given the amount of time and resources required to develop evidence on the alternate standards while meeting the goals of each student's IEPs. Based on the negative impact this change would have on our intellectually disabled students, I strongly urge you to reconsider the proposed timeline.</p> <p>Sincerely,</p>
Virginia Beach City Public Schools	Jinhee Wiskow ID Teacher	<p>My name is Jinhee Wiskow, and I am a new ID teacher at Pembroke Elementary School in Virginia Beach City Public Schools. Pembroke Elementary School is unique in that we service the largest population of children with disabilities (approximately 170 students) at the elementary school level in Virginia Beach. I have students with severe intellectual and physical disabilities who will take the VAAP assessment process in grades 3-5. I strongly oppose the change in the timeline for submitting VAAP binders two months in advance for the following reasons:</p> <ul style="list-style-type: none"> • By collecting VAAP evidence so far in advance of administering the SOL tests taken by regular education students, this proposal constitutes discrimination against special education students and, therefore, may warrant an investigation by the Office of Civil Rights. • Attendance is an issue especially with our medically fragile students. This limits the amount of time a teacher has to instruct the students and collect evidence of learning. • Students with significant cognitive, physical, and behavioral challenges need a greater amount of time to process and grasp concepts prior to testing. • We would be sacrificing the integrity of the learning environment to satisfy the personal convenience of the state school board members. • The strict format of the VAAP requires a great deal of time to gather

Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
		<p>and record evidence (planning and preparing the activity, taking pictures, typing narratives, and compiling all the pages for each objective).</p> <ul style="list-style-type: none"> • The quality of work would most definitely suffer, and thereby, lower the VAAP scores. • Seven teachers share two color printers and a limited number of black and white printers. It is time consuming to travel from room to room to see if the pictures captured the mastery of a skill correctly. If not, the process must be repeated. • The already high frustration level of students, teachers, and parents would increase with the implementation of a stricter timeline. <p>I would like to invite members of the Virginia Department of Education and members of the Virginia Board of Education to visit the ID classrooms at Pembroke Elementary School to observe the complexity of this process given the amount of time and resources required to develop evidence on the alternate standards while meeting the goals of each student's IEPs. Based on the negative impact this change would have on our intellectually disabled students, I strongly urge you to reconsider the proposed timeline.</p>

Comments on Proposed VAAP Schedule for 2011-2012

HENRICO COUNTY PUBLIC SCHOOLS

DR. PATRICK RUSSO
SUPERINTENDENT OF SCHOOLS



POST OFFICE BOX 23120
HENRICO, VIRGINIA 23223-0420
(804) 652-3600

August 26, 2011

Dr. Shelley Loving-Ryder, Assistant Superintendent
Virginia Department of Education
Division of Student Assessment
P. O. Box 2120
Richmond, VA 23218

Dear Dr. Loving-Ryder:

Henrico County's Exceptional Education Department and Research and Planning Department have carefully reviewed the proposed VAAP submission timeline and are strongly opposed to the suggested submission timeline modification. The proposed movement of the VAAP Collection of Evidence to March 7, 2012, will require local educational agencies to adjust the collection date from schools to February 2012. The defacto result of this movement is the expected completion of an entire academic year's worth of ASOL instruction to be delivered and documented within a single semester.

By VDOE definition, the population served by this alternate assessment is one composed of students with cognitive disabilities who require significant additional material and staffing support and more frequent, prolonged exposure and repetition to material to achieve mastery of content. The requirement for this student population to demonstrate mastery of a comparable volume of content, recognizing differences of depth, to their typically developing peers in a drastically reduced time frame is inappropriate and not in the best interest of students. The end result is a reduction of more than 40 days of instruction that will not be captured through our state student assessment system and a vastly reduced opportunity for our students and their families to receive accurate information regarding their child's performance in relation to the ASOL standards.

HCPS is cognizant of the challenges faced by the board in reconciling their oversight responsibility in establishing cut scores and the timeframe for data collection. However, the compromise proposed imposes sacrifices only upon the student population with the highest level of established need. In recognition of the conflict, HCPS proposes that the board consider scheduling two meetings in June to resolve the issue. This compromise places more of the burden of resolving the conflict with the adults rather than on the students.

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Comments on Proposed VAAP Schedule for 2011-2012

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In conclusion, HCPS unequivocally regards any compromise that results in reduced opportunities for students with disabilities to gain and demonstrate command of content as inappropriate and shortsighted. We appreciate the opportunity to provide input and look forward to a demonstration of the board's leadership in putting students first. Should you have any questions regarding HCPS' position in this matter, please contact Dr. Blumenthal, Director of Research and Planning or Dr. Gibson, Executive Director of Exceptional Education.

Sincerely,



Bondy Shay Gibson
Executive Director
Exceptional Education

Patrick J. Russo, Ed.D.
Superintendent

cc: Dr. Pat Wright, VDOE Superintendent
Dr. Penny Blumenthal, Director of R&P

Comments on Proposed VAAP Schedule for 2011-2012

Superintendent
Dr. Matthew J. Eberhardt

Director of Instruction
Mrs. Renee Honaker

60 School Board Court
Madison, VA 22727



Assistant Superintendent
Mr. Allan P. McLearn

Director of Student Services
Mrs. Susan Aylor

Main #: 540-948-3780
Fax #: 540-948-5143

MADISON COUNTY SCHOOL BOARD

September 8, 2011

Dr. Sharon Siler
Team Lead, Alternative Assessment
Test Administration, Scoring and Reporting
Student Assessment and School Improvement
Virginia Department of Education
James Monroe Building
101 N. 14th Street
Richmond, VA 23219

Dear Dr. Siler:

Leadership and teachers in Madison County are very concerned by the new proposed timeline, which requires our ID teachers to complete their VAAP collections 8 weeks earlier this year than last.

In the past VAAP collections were to be scored and entered by two deadlines, May 25th for the first half of the collections and the middle of June for the second half of the divisions' collections. Last year the state asked school divisions to ship all VAAP Collections by May 5 because Pearson was going to score them. The rationale for this request was that the new writing and history ASOL's had to be equated. This earlier deadline reduced instructional time for our students and teachers. School divisions had to collect the VAAP's and make sure that the technical requirements were all met since divisions would not have the opportunity to correct technical issues during local scoring events.

On August 11, 2011 school divisions received notification that the State Board of Education wants to ensure that they have two review times before they adopt cut scores for the VAAP. This request would require school divisions to ship the VAAP collections for scoring by March 7, 2012. This deadline is two months earlier than the 2010-2011 deadline.

The rest of a school divisions' non-writing assessments are driven by a window that the division chooses. Many divisions choose May 14-June 8 as their testing window. Madison County chooses this window to allow students an additional 9 weeks to learn and master material before they are tested. This new VAAP deadline denies students with disabilities an additional 8 weeks in order to learn and master their ASOL's. Furthermore, for high school students on block scheduling this reduces instructional time to approximately 5 weeks.

We hope that the State Board of Education will reconsider this new deadline and afford our students with disabilities the same amount of time for learning as their peers.

Sincerely,

Matthew Eberhardt
Superintendent

Susan Aylor
Director of Student Services

Madison Primary School
158 Primary School Drive
Madison, VA 22727
540-948-3781

Waverly Yowell Elementary School
1809 North Main Street
Madison, VA 22727
540-948-4511

William Wetsel Middle School
186 Mountaineer Lane
Madison, VA 22727
540-948-3783

Madison County High School
68 Mountaineer Lane
Madison, VA 22727
540-948-3785

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Additional Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
Montgomery County Public Schools	Cyndi Pitonyak PBS Coordinator	I am writing to request your consideration of extending the early March deadline for VAAP submission. This gives us basically only one semester to collect evidence for students who often take time to adjust to a new school year - new setting - new teachers and new demands. (We are a fully inclusive school district). An extended deadline would allow a much accurate picture of the performance of our students on adapted curriculum. Thank you for your consideration of this request.
Virginia Beach City Public Schools	Charles L. Spivey, Principal Pembroke Meadows Elementary School	<p>To the VDOE and Members of the Virginia Board of Education: I write to you to express my concern for possible changes to the VAAP submission deadline. Please consider the following reasons for NOT moving the VAAP submission deadline up by 2 months.</p> <ul style="list-style-type: none"> • Moving the deadline decreases the time frame to teach what they must know and be able to do. Our most vulnerable students already have a shorter period of time to demonstrate their progress since VAAPs are currently due in March. • By collecting VAAP evidence so far in advance of administering the SOL tests taken by regular education students, this proposal could constitute discrimination against special education students and lead to an Office of Civil Rights investigation. • Our medically fragile students tend to incur higher absenteeism already making it difficult for teachers to cover all of the objectives. Moving up the due date will increase existing limits on the amount of time a teacher has to instruct students and collect evidence. • Students with significant cognitive, physical, and behavioral challenges need a greater amount of time to process and grasp concepts prior to testing. • The strict format of the VAAP requires a great deal of time to gather and record evidence (planning and preparing the activity, taking pictures, typing narratives, and compiling all the pages for each objective). • The quality of work would most likely suffer, and thereby, lower the

Additional Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
		<p>VAAP scores.</p> <ul style="list-style-type: none"> • The already high frustration level of students, teachers, and parents would increase with the implementation of a stricter timeline. <p>Please do not sacrifice the integrity of the learning environment by changing the VAAP submission date. To do so would be unfair to our students, teachers, and families.</p> <p>Thank you for your consideration,</p>
Virginia Beach City Public Schools	C. Drummond Ball, Principal Windsor Woods Elementary School	<p>Dear Members of the Virginia State Board of Education,</p> <p>I was greatly disturbed and concerned when I heard of your impending consideration for requiring a very “early in the school year” alteration of the VAAP portfolio due date. As you know, from your own childhood, more time and practice on task gives a better picture of understanding. I have thought carefully on this topic and put before you the following considerations:</p> <ol style="list-style-type: none"> 1. Collecting the VAAP folder, so far in advance of administering the SOL tests taken by regular education students, may constitute discrimination against special education students and, possibly leading to an investigation by the Office of Civil Rights. Something we don’t want. 2. With our medically fragile students, this limits the amount of time a teacher has to instruct the students and collect evidence of learning. 3. Students with significant cognitive, physical, and behavioral challenges need a greater amount of time to process and grasp concepts prior to testing. 4. Publicly, it appears we will be sacrificing the integrity of the learning environment to satisfy the personal convenience of the state school board members. 5. Format of the VAAP requires a great deal of time to gather and record evidence, including planning and preparing the activity, taking pictures, typing narratives, and completing the portfolio with pages for each objective. 6. Student work quality would undoubtedly suffer, and thereby, render

Additional Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
		<p>unreliable VAAP scores.</p> <p>7. This earlier reporting timeline will create an even higher frustration level for students, teachers, and parents.</p> <p>As I contemplate this issue, I can only think how less useful will be the results, and how the newly proposed process will defeat the whole concept of the VAAP assessment for our young citizens, the special education students.</p> <p>Please make the final student product due date later in the year, rather than sooner.</p> <p>Sincerely,</p>
Virginia Beach City Public Schools	Christa N. Lassiter Special Education Teacher ED/LD Landstown Middle School	<p>I am writing in response to the potential timeline change for the submission to VAAP. I would like to express my concern with this proposal. I believe that the benefits to the board would not outweigh the negative impact on the students. These students and teachers are already having to provide instruction and demonstrate this knowledge in an abbreviated manner due to the current submission date. By moving the date to March, you will be asking them to move at an even faster pace, thereby placing another strain on the ability of the students to properly demonstrate their knowledge in the requested manner. The population of students assessed by the VAAP require the most time available to allow for the best possible performance and should actually be one of the last set of binders submitted. I humbly request that you do not move the binder submission forward for the benefit of the students.</p>
Virginia Beach City Public Schools	Julie Hamilton Intellectual Disabilities Teacher Landstown Middle School	<p>To : Members of the Virginia Department of Education</p> <p>As a veteran educator of students with moderate to severe cognitive delays, who participate annually in the Virginia Alternate Assessment Program (VAAP), I am compelled to address my concerns with the proposed timeline change for the submission of Collections of Evidence.</p> <p>Students participating in VAAP are those with the most severe cognitive delays. Because of this, they require the <i>most time</i> to learn new material, retain the information, and successfully attain mastery of educational goals. By significantly reducing the time allowed for these students to learn new information to mastery on the required ASOLs and complete the VAAP</p>

Additional Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
		<p>Collection of Evidence, you have significantly reduced their opportunity for success.</p> <p>Before voting on this issue Sept. 20, I strongly urge you to seriously consider the educational needs of these special education students. Time is a critical factor, and these students need more of it, not less. Please maintain the timeline we have had in the past to ensure that we are doing all we can to help our students succeed.</p> <p>Respectfully,</p>
Virginia Beach City Public Schools	Maureen Mitchell Intellectual Disabilities Teacher Princess Anne High School	<p>To : Members of the Virginia Department of Education</p> <p>As a veteran educator of students with moderate to severe cognitive delays, who participate annually in the Virginia Alternate Assessment Program (VAAP), I am compelled to address my concerns with the proposed timeline change for the submission of Collections of Evidence.</p> <p>Students participating in VAAP are those with the most severe cognitive delays. Because of this, they require the <i>most time</i> to learn new material, retain the information, and successfully attain mastery of educational goals. By significantly reducing the time allowed for these students to learn new information to mastery on the required ASOLs and complete the VAAP Collection of Evidence, you have significantly reduced their opportunity for success.</p> <p>Before voting on this issue Sept. 20, I strongly urge you to seriously consider the educational needs of these special education students. Time is a critical factor, and these students need more of it, not less. Please maintain the timeline we have had in the past to ensure that we are doing all we can to help our students succeed.</p> <p>Respectfully,</p>
Virginia Beach City Public Schools	Mona Grainger Intellectual Disabilities Teacher Princess Anne High School	<p>To : Members of the Virginia Department of Education</p> <p>As a veteran educator of students with moderate to severe cognitive delays, who participate annually in the Virginia Alternate Assessment Program (VAAP), I am compelled to address my concerns with the proposed timeline change for the submission of Collections of Evidence.</p> <p>Students participating in VAAP are those with the most severe cognitive delays. Because of this, they require the <i>most time</i> to learn new material, retain the information, and successfully attain mastery of educational goals. By significantly reducing the time allowed for these students to learn</p>

Additional Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
		<p>new information to mastery on the required ASOLs and complete the VAAP Collection of Evidence, you have significantly reduced their opportunity for success.</p> <p style="padding-left: 40px;">Before voting on this issue Sept. 20, I strongly urge you to seriously consider the educational needs of these special education students. Time is a critical factor, and these students need more of it, not less. Please maintain the timeline we have had in the past to ensure that we are doing all we can to help our students succeed.</p> <p style="text-align: center;">Respectfully,</p>
Virginia Beach City Public Schools	Laura Folden Corporate Landing Middle School Special Education Teacher Special Ed. Dept. Chair	<p>To Whom It May Concern,</p> <p style="padding-left: 40px;">My name is Laura Folden, and I am currently an ID teacher at Corporate Landing Middle School. I have been involved in VAAP since it was first started 10 years ago, and I have just been informed that our collection of evidence deadline has just been changed from the end of March to the end of January.</p> <p style="padding-left: 40px;">I have several concerns with this. One being you are requesting a whole year's worth of education in a single semester. Also, this population of students already requires much remediation to gain the knowledge required for evidence, and now our time has been cut by two months. We were already required to turn in our VAAP binders much earlier than VGLA binders and the administration of the SOL tests, and now that date has been shortened again. The most important factor is that it is not fair to the students! If we are required to collect a whole year's worth of evidence in a semester, this would be short changing the students' rights to an appropriate education. The education may be rushed, and a proper representation of their ability may not be collected.</p> <p style="padding-left: 40px;">I was very shocked to hear that the state is requiring this material so early due to the nature of these young peoples' disabilities, and I would hope that you would consider changing the timeline back to what has worked in the past! Thank you.</p>
Virginia Beach City Public Schools	Isaac Odibo Intellectual Disabilities Teacher Princess Anne High School	<p style="text-align: center;">Sept. 19, 2011</p> <p>To : Members of the Virginia Department of Education</p> <p style="padding-left: 40px;">As a veteran educator of students with moderate to severe cognitive delays, who participate annually in the Virginia Alternate Assessment Program (VAAP), I am compelled to address my concerns with the proposed timeline</p>

Additional Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
		<p>change for the submission of Collections of Evidence.</p> <p>Students participating in VAAP are those with the most severe cognitive delays. Because of this, they require the <i>most time</i> to learn new material, retain the information, and successfully attain mastery of educational goals. By significantly reducing the time allowed for these students to learn new information to mastery on the required ASOLs and complete the VAAP Collection of Evidence, you have significantly reduced their opportunity for success.</p> <p>Before voting on this issue Sept. 20, I strongly urge you to seriously consider the educational needs of these special education students. Time is a critical factor, and these students need more of it, not less. Please maintain the timeline we have had in the past to ensure that we are doing all we can to help our students succeed.</p> <p>Respectfully,</p>
Virginia Beach City Public Schools	Angela Dunkailo Intellectual Disabilities Teacher Princess Anne High School	<p>Sept. 19, 2011 To : Members of the Virginia Department of Education</p> <p>As a veteran educator of students with moderate to severe cognitive delays, who participate annually in the Virginia Alternate Assessment Program (VAAP), I am compelled to address my concerns with the proposed timeline change for the submission of Collections of Evidence.</p> <p>Students participating in VAAP are those with the most severe cognitive delays. Because of this, they require the <i>most time</i> to learn new material, retain the information, and successfully attain mastery of educational goals. By significantly reducing the time allowed for these students to learn new information to mastery on the required ASOLs and complete the VAAP Collection of Evidence, you have significantly reduced their opportunity for success.</p> <p>Before voting on this issue Sept. 20, I strongly urge you to seriously consider the educational needs of these special education students. Time is a critical factor, and these students need more of it, not less. Please maintain the timeline we have had in the past to ensure that we are doing all we can to help our students succeed.</p> <p>Respectfully,</p>

Additional Comments on Proposed VAAP Schedule for 2011-2012

School Division & Contact Information	Name and Title	Comment
Virginia Beach City Public Schools	Roslyn A. Cheek	<p>It has been brought to my attention that the deadline for VAAP submissions for the 2011-12 school years has been revised. It is my understanding that the collection of evidence will be due to Pearson's for scoring in early March instead of early May as it has been in the past. In order to comply with this deadline, my school division, Virginia Beach City Public Schools is requiring binders be turned in early February in order to prepare for the final submission. This means that students with significant cognitive disabilities are supposed to learn and demonstrate mastery of their ASOL objectives by the end of January, which is much sooner than students who are not faced with significant cognitive challenges. A shortened period does a serious disservice to the students who participate in VAAP.</p> <p>The students who participate in VAAP are students who due to the significance of their cognitive disability are unable to participate in the SOL's. Research has shown that students with severe disabilities, which are the group of students I teach, have a slow acquisition rate for learning new skills. They require more instruction trials in learning specific skills than their counterparts without significant disabilities. It is unfair to require students who require more time to learn information less time to demonstrate mastery. One of the requirements of participation in VAAP is that a student's present level of performance must indicate a need for extensive direct instruction and/or intervention in a curriculum based ASOL.</p> <p>It is my recommendation to not change the timeline for the students who participate in VAAP. They should be given the same amount of time as students who are working on grade level SOL material, if not longer, to learn and demonstrate mastery of their VAAP objectives.</p>

Comments on Proposed VAAP Schedule for 2011-2012



School

Corporate Landing Elementary

1590 Corporate Landing Parkway

Virginia Beach, Virginia 23454

*David B. French,
Principal
Virginia O'Malley, Assistant Principal*

September 12, 2011

To the Virginia Department of Education State Board Members

Hello, my name is David French; I have been a principal for Virginia Beach City Public Schools for the past 8 years. Corporate Landing is home to a large population of students with hearing impairments and multi-handicapped. Our teachers are exceptional and Corporate Landing has a great reputation, in large part because of the quality of instruction, care and compassion we have for our students. It is because of the quality of instruction that I write my concern about the proposal of changing the timeline for submitting VAAP binders two months in advance for the following reasons:

- By collecting VAAP evidence so far in advance of administering the SOL tests taken by regular education students, this proposal constitutes discrimination against special education students and, therefore, may warrant an investigation by the Office of Civil Rights.
- Attendance is an issue especially with our medically fragile students. This limits the amount of time a teacher has to instruct the students and collect evidence of learning.
- Students with significant cognitive, physical, and behavioral challenges need a greater amount of time to process and grasp concepts prior to testing.

Comments on Proposed VAAP Schedule for 2011-2012

- We would be sacrificing the integrity of the learning environment to satisfy the personal convenience of the state school board members.
- The strict format of the VAAP requires a great deal of time to gather and record evidence (planning and preparing the activity, taking pictures, typing narratives, and compiling all the pages for each objective).
- The quality of work would most definitely suffer, and thereby, lower the VAAP scores.
- The already high frustration level of students, teachers, and parents would increase with the implementation of a stricter timeline.
- The bottom line is this is not fair or equitable to students, teachers and parents.

Based on the negative impact this change would have on our intellectually disabled students, I strongly urge you to reconsider the proposed timeline.

Sincerely,

David French,

Principal, Corporate Landing Elementary School



David B. French

Principal

Corporate Landing Elementary School

A man is never taller than when he stoops to help a child.

Comments on Proposed VAAP Schedule for 2011-2012



Chesapeake Public Schools
 School Administration Building
 Post Office Box 16496
 Chesapeake, Virginia 23328-6496

September 19, 2011

Dr. Patricia I. Wright
 Superintendent of Public Instruction
 Virginia Department of Education
 P.O. Box 2120
 Richmond, VA 23218

Dear Dr. Wright:

After reviewing the Virginia Department of Education's Superintendent's E-mail dated August 11, 2011, Chesapeake Public Schools (CPS) would like to express strong concerns regarding the proposal to alter the timelines for the 2011-2012 submission of the Virginia Alternate Assessment Program (VAAP) collections of evidence. As we are sure the Virginia Department of Education (VDOE) and the Virginia Board of Education are aware, the VAAP is an assessment program designed to measure progress for our most significantly cognitive delayed students. It is a time intensive assessment that is highly individualized and requires major effort from both teachers and students. The proposed time of submission of early March as opposed to early May presents great difficulties with respect to addressing the requirements of this program. This date comes only a few weeks after the conclusion of the first semester and would require intensive acceleration of instruction with some of our most challenged students.

An earlier submission deadline would also severely limit our ability to effectively assess student progress and determination of mastery and maintenance of skills. In effect, a decision to move the submission date earlier would eliminate nearly half of the regular school days scheduled for 2011-2012 that are designed for highly intensive, individualized instruction. The very nature of the students that participate in this assessment requires ongoing and consistent instruction and assessment to develop an accurate measure of their progress. Such a drastic move absolutely creates a disadvantage for a very unique population of students and could be construed as discriminatory.

Chesapeake Public Schools strongly encourages the VDOE and the Virginia Board of Education to reconsider their intent to alter the submission timeline for VAAP collections of evidence.

Thank you for your time and your fervent consideration of this very important matter.

Sincerely,

Craig S. Pinello
 Director of Special Education

*The Chesapeake Public School System is an equal educational opportunity school system.
 The School Board of the City of Chesapeake also adheres to the principles of equal opportunity in employment and, therefore,
 prohibits discrimination in terms and conditions of employment on the basis of race, sex, national origin, color, religion, age, or disability.*

Comments on Proposed VAAP Schedule for 2011-2012



Fauquier County Public Schools

Jonathan Lewis, Ed.D., Superintendent of Schools
320 Hospital Drive, Suite 40
Warrenton, VA 20186-3037
(540) 422-7000-phone
(540) 422-7059-fax

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MEMORANDUM

To: Shelley Loving-Ryder,
Assistant Superintendent for Student Assessment and School Improvement
Virginia Department of Education, Assessment Division

From: Jonathan Lewis, Superintendent of Schools 
Sandra Mitchell, Associate Superintendent for Instruction 

Date: September 19, 2011

Re: *New VAAP Timeline and Online Writing Pilot*

We are writing to express our concern about the new timeline which requires our teachers to complete their Virginia Alternate Assessment Program (VAAP) collections eight weeks earlier than last year.

In the past VAAP collections were to be scored and shipped in May. We learned in August that the State Board of Education wants school divisions to ship the VAAP collections by March 7th to ensure that the state has two review opportunities before adopting the cut scores. While we understand the need for a thorough review at the state level, we believe that the loss of two months of instruction and time to document academic growth on the Aligned Standards is an unreasonable expectation.