

**WEST VIRGINIA
SECRETARY OF STATE
KEN HECHLER
ADMINISTRATIVE LAW DIVISION**

Form #5

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FILED

DEC 16 4 27 PM '96

OFFICE OF WEST VIRGINIA
SECRETARY OF STATE

**NOTICE OF AGENCY ADOPTION OF A PROCEDURAL OR INTERPRETIVE RULE
OR A LEGISLATIVE RULE EXEMPT FROM LEGISLATIVE REVIEW**

AGENCY: West Virginia Board of Education TITLE NUMBER: 126

CITE AUTHORITY: W.Va. Const., Article XII, §2; W.Va. Code §§18-2-5 and
18-2E-8(c)(1).

RULE TYPE: PROCEDURAL _____ INTERPRETIVE X

EXEMPT LEGISLATIVE RULE X

CITE STATUTE(S) GRANTING EXEMPTION FROM LEGISLATIVE REVIEW
W.Va. Code §§29A-3B-1, et seq.; W.Va. Board of Education v. Hechler
180 W.Va. 451; 376 S.E.2d 839 (1988)

AMENDMENT TO AN EXISTING RULE: YES X, NO _____

IF YES, SERIES NUMBER OF RULE BEING AMENDED: 14

TITLE OF RULE BEING AMENDED: The Statewide Assessment Program (2340)

IF NO, SERIES NUMBER OF NEW RULE BEING ADOPTED: _____

TITLE OF RULE BEING ADOPTED: _____

THE ABOVE RULE IS HEREBY ADOPTED AND FILED WITH THE SECRETARY OF STATE. THE
EFFECTIVE DATE OF THIS RULE IS July 1, 1997 (Unless specified otherwise
within the policy.)

Cynthia E. Evans

Cynthia E. Evans
Director, Legal Services

Executive Summary
Regulations for Statewide Assessment Program
Policy 2340
Adopted December 12, 1996

PURPOSE

Policy 2340 defines the current Statewide Assessment Program and provides guidelines for implementation.

BACKGROUND

West Virginia Code §§18-2-5 and 18-2E-8(c) establish the authority of the West Virginia Board of Education to establish a Statewide Assessment Program. This Statewide Assessment Program will measure educational progress of public school students in attaining high quality education and includes:

1. Norm-referenced component
2. Writing Assessment component
3. National Assessment of Educational Progress (NAEP) component
4. Additional assessments include Act Explore for all 8th grade students and ACT Work Keys for all 12th grade students.

CONTENT

One hundred twenty-six comments were received during the comment period. The major revision to the policy is the assurance that the tests given in grades 1-12 will be machine scored and that special education students who do not participate in the statewide assessment will be given an alternative form of assessment.

FISCAL NOTE WORKSHEET

(Submit 4 Copies)

HD NO _____ DRAFT NO _____ BILL NO _____ RESOLUTION NO _____

SUBJECT Policy 2340 FUND _____

SOURCE OF REVENUE: GENERAL FUND SPECIAL OTHER (SPECIFY) _____

COST OF ESTIMATE BASED ON: AN ORIGINAL ESTIMATE BUDGET BILL OTHER (SPECIFY) _____

INCOME ESTIMATE BASED ON: AN ORIGINAL ESTIMATE BUDGET BILL OTHER (SPECIFY) _____

SHOW OVER-ALL EFFECT IN ITEMS 1 AND 2 & GIVE EXPLANATION OF BREAKDOWN BY FISCAL YEAR INCLUDING LONG-RANGE EFFECT

EFFECT OF PROPOSAL	ANNUAL		FISCAL YEAR		
	INCREASE	DECREASE	CURRENT	NEXT	THEREAFTER
1. ESTIMATED TOTAL COST	\$ *	\$	\$	\$	\$
PERSONAL SERVICES CURRENT EXPENSES REPAIRS/ALTERATIONS EQUIPMENT OTHER	\$	\$	\$	\$	\$
2. ESTIMATED TOTAL REVENUES	\$	\$	\$	\$	\$

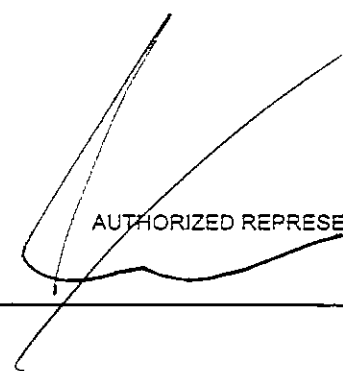
3. EXPLANATION OF ABOVE ESTIMATES (INCLUDING LONG-RANGE EFFECT):

* No additional funding required.

DATE 9/4/96

AGENCY _____

AUTHORIZED REPRESENTATIVE



126CSR14

**TITLE 126
LEGISLATIVE RULE
BOARD OF EDUCATION**

**SERIES 14
THE STATEWIDE ASSESSMENT PROGRAM (2340)**

§126-14-1. General.

1.1. Scope - This policy establishes rules governing the administration and operation of the Statewide Assessment Program.

1.2. Authority - West Virginia Constitution, Article XII, §2; W.Va. Code §§18-2-5 and 18-2E-8(c)(1).

1.3. Filing Date - December 16, 1996.

1.4. Effective Date - July 1, 1997.

1.4.1. Unless specified otherwise within the policy.

1.5. Amendment of former rule. This rule revises 126CSR14 (Policy 2340). Last revised July 1991.

§126-14-2. Purpose.

2.1. The purpose of this policy is to provide an operational framework to administer an effective and efficient statewide assessment program, protect the integrity of test data, and support the use of assessment data to improve instruction.

§126-14-3. Program Regulations.

3.1. All students listed on a teacher's register in grades one through eleven shall be included in the Statewide Assessment Program, Norm-Referenced component, in the spring of each year. Special education students may be excused if documented in their Individualized Education Program (IEP). For those special education students who do not participate in the statewide assessment, an alternative form of assessment must be conducted.

3.2. The Statewide Assessment Program, Norm-Referenced component, will test the subjects of reading, language, spelling, study skills, mathematics, science, and social

sciences at grades 3 through 11. Subjects being tested at grades 1 and 2 are reading, mathematics, language, and listening. Listening will also be tested in grades 3 through 8.

3.3. All students listed on a teacher's register as part of the 4th, 7th and 10th grade enrollments shall be included in the Statewide Assessment Program, Writing Assessment component, in the spring of each year. Special Education students may be excused if documented in their Individualized Education Program (IEP).

3.4. All students listed on a teacher's register as a part of Kindergarten enrollment shall be included in the Statewide Assessment Program, Metropolitan Readiness Test component. The Metropolitan Readiness Test will be used to assess student progress and identify individual instructional needs.

3.5. All students listed on a teacher's register as a part of 8th grade enrollment shall be included in the Statewide Assessment Program, American College Testing (ACT) Explore assessment component, that will be administered in the fall of each year.

3.6. All students listed on a teacher's register as a part of the twelfth grade enrollment shall be included in the Statewide Assessment Program, ACT Work Keys component, that will be used to monitor students' knowledge of process/workplace skills. The ACT Work Keys will be administered in the fall of each year.

3.7. A determined effort shall be made to administer a make-up test to those students not tested during the regular test administration. All testing (regular and make-up) must be completed during the designated testing window.

3.8. Teachers will not be required to grade any portion of the statewide assessment instruments in grades 1-12 except for those teachers who are both trained and paid to grade the writing assessment.

3.9. The National Assessment of Educational Progress (NAEP) component of the Statewide Assessment Program will test a random sample of students and schools at grades 4, 8, and 12. The subject(s) of this test will be determined by the National Assessment of Educational Progress each year. The NAEP reports only state, regional, and national data.

3.10. The testing program shall be managed by a county test coordinator who has been provided training in administering the test instruments used in this program. County test coordinators shall provide training to all teachers and counselors who administer the tests.

3.11. Test booklets shall be used only in conjunction with the Statewide Assessment Program. Use of test booklets, copies of the booklets or excerpts from the test booklets, apart from the scheduled test administration to students, is inappropriate and unethical. Practice tests, alternate forms, test improvement programs and technology may be used to prepare students to take the test.

3.12. Test booklets shall be stored in a secure, central location by the county test coordinator consistent with procedures outlined in the Testing Code of Ethics that has been distributed to all county test coordinators and superintendents.

3.13. Counties shall provide staff development programs in test administration, interpretation and use for all appropriate central office and school building level professional staff.

3.14. The county test coordinator in each county shall develop an outline or overview regarding the administration and use of the Statewide Assessment Program test results.

3.15. All students and parents of students who participate in the Statewide Assessment Program shall be informed of the individual student test results, with the exception of NAEP results, and shall be provided the opportunity for explanation and interpretation of those results by trained professional staff within the schools.

3.16. All student test data will be kept in files that can be locked. Student test data will be maintained under conditions consistent with the requirements of the Family Educational Rights and Privacy Act of 1974 (P.L. 98-380).

3.17. All teachers shall be provided norm-referenced and item data for the students in their schools and/or classrooms for the areas of instruction for which they are responsible. Other professional staff in the school are to access the test results for individuals and groups of students for the purposes of instructional planning.

3.18. The West Virginia Department of Education may release county as well as overall state averages in grades 3 through 11 on the norm-referenced test and grades 4, 7, and 10 on the Writing Assessment. The West Virginia Department of Education will release to the public only those records that are not identifiable to a student or small group of students and are not integral to the testing process. Neither test booklets nor specific test items will be released to any non-school parties.

3.19. The West Virginia Department of Education will routinely review county, school and classroom test data reports to identify irregularities in testing procedures,

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modifications of test answer sheets, or other unethical practices. These procedures are outlined in the Testing Code of Ethics provided to all county test coordinators and superintendents. —

3.20. The county superintendent will be informed of any suspected irregularities and asked to either conduct an investigation of the suspected irregularity or to cooperate in the Department of Education's investigation.

3.21. Documented willful misconduct on the part of an educator can result in loss of licensure. —

POLICY 2340: THE STATEWIDE ASSESSMENT PROGRAM
COMMENT LOG
September 12, 1996 - October 31, 1996

ACTION
 N: No Response
 NA: Not Accepted
 A: Accepted

TYPE
 - Negative
 + Positive
 o Neutral

Date	Individual/Organization	Comments	Action/ Type	Rationale
10/25/96	Mark Carl Fawcett Counselor, Magnolia HS 601 Maple Avenue New Martinsville, WV 26155	Can we get student reports that do not have to be trimmed and folded to fit into a cumulative record folder? Will test score labels be provided? Can they be die cut labels instead of perforated in order to facilitate placing them in record folders?		
10/27/96	Hampshire County Schools 46 South High Street Romney, WV 26757	Excellent plan - Systemwide assessment is needed.		
10/27/96	Donna Lemaster North Middle School 105 East Road	The ACT Explore gives a very limited amount of information compared to the COP/CAPS. We plan to continue the COPS/CAPS testing because ACT Explore alone is inadequate. This puts another burden on our test-weary students, and disrupts teaching time. It would make the best sense to mandate the COPS/CAPS and let the Explore be optional. The COPS/CAPS assessment appears to better determine our students career direction and to give better information.		
10/28/96	William Toussaint WV Dept. Of Education Bldg 6 Room 362 Charleston, WV 26305	Excellent! NOT. Classroom itself will constitute a student's portfolio, I suppose.		

Date	Individual/Organization	Comments	Action/Type	Rationale
10/25/96	Mark Carl Fawcett Counselor, Magnolia HS 601 Maple Avenue New Martinsville, WV 26155	Is the NAEP to be given to all 12th grade students statewide? When? I do not feel it is educationally or statistically sound to compare students from different geographic areas of the state on the basis of standardized test scores when the funding levels for counties are not all the same.		§126-43-3. Purpose
10/28/96	Vickie VanBeem Jill R. Parker HC71, Box 120 Augusta WV 26704	<p>§126-14-3. Program Regulations</p> <p>3.10 The wording is vague in regard to the use of test preparation materials. Current wording gives an unfair advantage to more economically affluent counties who can purchase practice tests, alternate forms, test improvement programs, and technology. The decision to use or not use practice tests could alter validity of tests results from county to county.</p>		

**POLICY 2340: THE STATEWIDE ASSESSMENT PROGRAM
COMMENT LOG
November 1, 1996 - November 15, 1996**

ACTION TYPE
 N: No Response - Negative
 NA: Not Accepted + Positive
 A: Accepted o Neutral

Date	Individual/Organization	Comments	Action/Type	Rationale
11/1/96	Denver Drake Braxton County Middle 100 Carter Braxton Drive Sutton, WV 26601	I have a concern about Social Studies and Science not being taught unless/until Basic Skills have been mastered. How is this going to affect the proficiency guarantee when graduating if they've not had enough social studies and science in the lower grades?		
11/6/96	Boone County Kindergarten Academy Faculty Senate PO Box 730 Uneeda, WV 25205	Standardized tests should not be given in kindergarten.		
11/6/96	Eileen Poling 215 Homewood Street Parsons, WV 26287	We are doing so much testing, when do we teach?		
11/6/96	Kozan Halstead PO Box 369 Comfort, WV 25049	At the kindergarten level, we don't give this test until the spring. I also feel kindergarten students are too young to be given this type of test.		
11/6/96	Elizabeth Potterfield PO Box 369 Comfort WV 25049	What is the abbreviated test for 1st/2nd grades? It seems like a good idea to give an abbreviated test at particular levels, rather than to test children to death every year.		
11/6/96	N. Sutphin Box 369 Comfort, WV 25049	Why are children tested year after year? It seems that they are over-tested.		

Date	Individual/Organization	Comments	Action/Type	Rationale
11/18/96	Jane Chandler 3810 Liberty Street Parkersburg, WV 26104	Group administered standardized achievement tests are inappropriate for kindergarten. Such tests have been shown to measure very limited dimensions of literacy and numeracy development. These tests have also been shown to have deleterious effects on curriculum and instruction by narrowing the curriculum to skills that are easily measured through multiple choice questions. I support a system of integrated curriculum and assessment in which curriculum goals are clear to teachers and parents, in which teachers continually observe and document children's progress.		
11/12/96	Shelia Edwards Rt 3 Box 108B Washington, WV 26181	Senate Bill 300 refers to "assessment" - this does not mean there has to be group-administered standardized tests given at every grade level. These tests are very inappropriate for kindergarten children, and also unsuitable for first and second graders.		
11/12/96	Barbara A. Falck 1813 Liberty Street Parkersburg, WV 26101 Ruth E. Letchell Early Childhood Teacher Reading Specialist Cindy Schlarb Amy R. Cibik Early Childhood Specialist Kindergarten Teacher Tammy Chambers	As a teacher I am strongly opposed to the group-administered, standardized tests which will be given to children in grades K-2 as a result of the WV Department of Education's interpretation of Senate Bill 300. Research and child development experts tell us that such tests can cause psychological stress, intellectual harm and cause teachers to teach to the test instead of to the child. Young children are not physically ready to take such long, formal tests. I have no objections to assessments of children. Teachers do it daily for diagnostic and curriculum purposes. The Metropolitan Readiness Tests and those types of formal tests are simply not appropriate for young children, nor are they accurate assessment tools. I would like to impress upon you that early childhood experts are not being consulted. They have been left out of any decision making pertaining to the testing. Large-scale achievement testing in the early grades is not sound early childhood practice and is not a wise use of resources. Please support amending Senate Bill 300 to eliminate this form of assessment in grades K-2.		

Date	Individual/Organization	Comments	Action/Type	Rationale
11/12/96	Jane McCabe McKinley School Parkersburg, WV 26101	Group administered standardized achievement tests are inappropriate for kindergarten. Such tests have been shown to measure very limited dimensions of literacy and numeracy development. These tests have also been shown to have deleterious effects on curriculum and instruction by narrowing the curriculum to skills that are easily measured through multiple choice questions. I support a system of integrated curriculum and assessment in which curriculum goals are clear to teachers and parents, in which teachers continually observe and document children's progress.		
11/13/96	J. T. Chicchirichi Harpers Ferry Junior High Faculty Senate Rt 3 Box 93 Harpers Ferry, WV 25425	As educators, we agree that our State Educational System must revise and update current policies and requirements in order to prepare students for the 2000 school year and thereafter. However, the proposed policies and regulations in S.B. 300 are rigorous and unreasonable. There are too many expectations and standards required to be implemented in an unrealistic amount of time. Drastic changes in curriculums and assessment procedures should not be made without more local level input from individual county school systems. All disciplines should be represented before educational programs, co-curricular activities are eliminated. Teacher input and recommendations must be considered before changing educational objectives. We feel S.B.300 should not be approved because more time is required for discussion and implementation.		
11/13/96	Camilla Murray-Pugh #3 Murray Drive Parkersburg, WV 26101	As a parent I am concerned about the group administered standardized testing. I realize that children need to be given time to develop on their own. Standardized testing is an inappropriate method for evaluating young children and is going to put young children in a very frustrating situation. I respect and want the teachers in this state to continue to assess children through observation and documentation of their daily work. I would recommend a work sampling approach.		

Date	Individual/Organization	Comments	Action/ Type	Rationale
11/13/96	Amy Murray Rt 5 #1 Murray Drive Parkersburg, WV 26101	As a parent I am concerned about the group administered standardized testing. I realize that children need to be given time to develop on their own. Standardized testing is an inappropriate method for evaluating young children and is going to put young children in a very frustrating situation. I respect and want the teachers in this state to continue to assess children through observation and documentation of their daily work. I would recommend a work sampling approach.		
11/13/96	Frank W. Pugh #3 Murray Drive Parkersburg, WV 26101	As a parent I am concerned about the group administered standardized testing. I realize that children need to be given time to develop on their own. Standardized testing is an inappropriate method for evaluating young children and is going to put young children in a very frustrating situation. I respect and want the teachers in this state to continue to assess children through observation and documentation of their daily work. I would recommend a work sampling approach.		
11/13/96	Kathy Reifsteck 600 55th Street Vienna, WV 26105	As a parent I am concerned about the group administered standardized testing. I realize that children need to be given time to develop on their own. Standardized testing is an inappropriate method for evaluating young children and is going to put young children in a very frustrating situation. I respect and want the teachers in this state to continue to assess children through observation and documentation of their daily work. I would recommend a work sampling approach.		

Date	Individual/Organization	Comments	Action/Type	Rationale
11/13/96	Dorothy Renfro McKinley School Parkersburg, WV 26101	Group administered standardized achievement tests are inappropriate for kindergarten. Such tests have been shown to measure very limited dimensions of literacy and numeracy development. These tests have also been shown to have deleterious effects on curriculum and instruction by narrowing the curriculum to skills that are easily measured through multiple choice questions. I support a system of integrated curriculum and assessment in which curriculum goals are clear to teachers and parents, in which teachers continually observe and document children's progress.		
11/13/96	Laura Bradley 2100 Foley Drive Parkersburg, WV 26104	Group administered standardized achievement tests are inappropriate for kindergarten. Such tests have been shown to measure very limited dimensions of literacy and numeracy development. These tests have also been shown to have deleterious effects on curriculum and instruction by narrowing the curriculum to skills that are easily measured through multiple choice questions. I support a system of integrated curriculum and assessment in which curriculum goals are clear to teachers and parents, in which teachers continually observe and document children's progress.		
11/13/96	Catherine Hawkins Williamstown Elementary 418 Williams Avenue Williamstown, WV 26187	Group administered standardized achievement tests are inappropriate for kindergarten. Such tests have been shown to measure very limited dimensions of literacy and numeracy development. These tests have also been shown to have deleterious effects on curriculum and instruction by narrowing the curriculum to skills that are easily measured through multiple choice questions. I support a system of integrated curriculum and assessment in which curriculum goals are clear to teachers and parents, in which teachers continually observe and document children's progress.		

Date	Individual/Organization	Comments	Action/Type	Rationale
11/13/96	Donna A. Wood 5 Lynwood Drive Vienna, WV 26105	Group administered standardized achievement tests are inappropriate for kindergarten. Such tests have been shown to measure very limited dimensions of literacy and numeracy development. These tests have also been shown to have deleterious effects on curriculum to the skills that are easily measured through multiple choice questions. I support a system of integrated curriculum and assessment in which teachers continually observe and document children's progress.		
11/13/96	Mollie Boso Rt 1 Box 182B Belleville, WV 26133	As a parent I am concerned about the group administered standardized testing. I realize that children need to be given time to develop on their own. Standardized testing is an inappropriate method for evaluating young children and is going to put young children in a very frustrating situation. I respect and want the teachers in this state to continue to assess children through observation and documentation of their daily work. I would recommend a work sampling approach.		
11/13/96	Donna Adams Cabell County Schools PO Box 446 Huntington WV 25709	Kindergarten and first graders should be excluded from standardized testing. David Elkind suggests in his literature and research that children not be subjected to standardized testing until the third grade. Michael Sampson in Pathways to Literacy states that young children are only frustrated by the testing experience. We are only finding out if they can fill in the bubble - not what they have achieved. NAYCE does not recommend testing young children.		
11/14/96	Kim Underwood New Martinsville School 20 Benjamin Drive New Martinsville, WV	County to county to be consistent. Conflict of interests with textbooks and tests too much testing.		
11/14/96	Greg Richmond New Martinsville School New Martinsville, WV	I am concerned about use of test produced by a textbook company.		

Date	Individual/Organization	Comments	Action/Type	Rationale
11/14/96	Dorothy Downing New Martinsville School 20 E Benjamin Drive New Martinsville, WV 26155	Possible conflict by test being written by one publishing company. Testing of Special Students needs to be consistent throughout the state "Documented Misconduct" needs to be better defined.		
11/14/96	Janice Kasserman New Martinsville School 20 E Benjamin Drive New Martinsville, WV 26155	Test written by one company - items based on their tests. To much testing time.		
11/14/96	Connie Frye New Martinsville School 20 E Benjamin Drive New Martinsville, WV 26155	Possible conflict by test being written by one publishing company. Testing of Special Students needs to be consistent throughout the state "Documented Misconduct" needs to be better defined.		
11/14/96	Karen Talbert New Martinsville School 20 E Benjamin Drive New Martinsville, WV 26155	Is there a conflict with the test publisher and reading series? Are goals and objectives similar or are specific items stressed due to interest of publisher?		
11/14/96	Debbie West New Martinsville School 20 E Benjamin Drive New Martinsville, WV 26155	The testing of special education students needs to be absolutely consistent from county to county. Stanford Achievement - published by Harcourt Brace? Conflict of interest.		
11/14/96	Patricia Sullivan New Martinsville School 20 E Benjamin Drive New Martinsville, WV 26155	Would many materials need to be redirected toward Harcourt Brace? Would test be slanted toward their materials? Testing needs to be conducted in 3rd week of April, not done in March. Much information hasn't or won't be done until March (5th grade American History, etc.). Too much time spent on testing: can't teach normal subjects.		

Date	Individual/Organization	Comments	Action/Type	Rationale
11/14/96	Cindy Riley New Martinsville School 20 E Benjamin Drive New Martinsville, WV 26155	Is there a conflict that test written by one publishing company? Too much testing time.		
11/14/96	Barbara Quinet New Martinsville School 20 E Benjamin Drive New Martinsville, WV 26155	Is there a conflict that test written by one publishing company? Too much testing time.		
11/14/96	Cynthia Weber New Martinsville School 20 E Benjamin Drive New Martinsville, WV 26155	The testing of special education students needs to be consistent county by county!		
11/14/96	Debbie Keough New Martinsville School 20 E Benjamin Drive New Martinsville, WV 26155	Testing needs to be absolutely consistent from county to county. Is there a conflict that test written by one publishing company? Too much testing time.		
11/14/96	Carolyn Zeppuhar 61 Orchard Drive New Martinsville, WV 26155	Is there a problem that the test was written by one publishing company? I feel we do too much testing. It also needs to be defined what is misconduct of teachers.		
11/14/96	George G. Wilson 409 Edgewood Terrace New Martinsville, WV 26155	Will those counties using HBJ materials in their classrooms be given an unfair advantage?		
11/14/96	Therese Hayes Rt 1 Box 149A Proctor, WV 26055	Is there conflict between test publisher (HBJ) and their textbooks? Testing possible for 4th grade only.		

Date	Individual/Organization	Comments	Action/Type	Rationale
11/14/96	Emily Fenton 651 Maple Avenue New Martinsville, WV 26155	Conflict between test and Harcourt text materials validity. Excessive time spent on teaching in order to "test" well. Time needed to comply with JEP, MEP will their results adversely effect cumulative results who will monitor to uniformly statewide?		
11/14/96	Pat Wildman 655 James Street New Martinsville, WV 26155	Is there a conflict with Harcourt Brace publishing the test and also textbooks? Too much time is spent testing.		
11/14/96	Patricia Bills 821 1/2 Fifth Street New Martinsville, WV	Since this Harcourt Brace test. Will there be conflict of interest from this textbook company?		
11/14/96	Pam Chapman 20 E Benjamin Drive New Martinsville WV 26155	Is there a conflict with the test publisher and reading series? Are goals and objectives similar? We test to much and teach to little. Define documented misconduct. It is to broad.		
11/14/96	Lynn Barcus 20 E Benjamin Drive New Martinsville WV 26155	Is there any concern that the test is written by one publishing company? Testing of special education students needs to be consistent among all counties. "Documented Misconduct" needs defined.		
11/14/96	Lee Ann Schanbach 20 E. Benjamin Drive New Martinsville, WV 26155	Testing needs to be absolutely consistent with the methods of testing special education students from county to county. Define misconduct of faculty members in regard to testing methods.		
11/14/96	Jo Kirk New Martinsville School 20 E Benjamin Drive New Martinsville WV 26155 Proctor, WV 26055	Why does testing need to be completed in March? Everything has not been taught that could be on the test. Is it a problem that test is written by one publishing company? Too much testing time.		
11/14/96	Flatwoods Elem. School PO Box 130 Flatwoods, WV 26621	Care needs to be given that the time for the tests is the same statewide - i.e. some teachers may hurry through the tests and their students would be cheated if not allowed enough days, etc.		

Date	Individual/Organization	Comments	Action/Type	Rationale
11/14/96	Mark Carl Fawcett Network Administrator Magnolia High School 601 Maple Avenue New Martinsville, WV 26155	Counties need to be given an opportunity to align curriculum with what is being tested before test is administered. Ex. -- Freshman--World History-- Tested on Am. History.		
11/14/96	Joanne Fawcett 210 Riverside Drive New Martinsville, WV 26155	Counties need to be given an opportunity to align curriculum with what is being tested before test is administered. Ex. -- Freshman--World History-- Tested on Am. History		
11/14/96	Magnolia High School 601 Maple Avenue New Martinsville, WV 26155	Counties need to be given an opportunity to align curriculum with what is being tested before test is administered. Ex. -- Freshman--World History-- Tested on Am. History		
11/14/96	Franklin Primary School Faculty Senate 1305 Washington Pike Wellsburg WV 26070	Funding for all the assessments would be done by local county Boards. Where will counties get these funds? Will they come from other important programs which may be curtailed or eliminated because funds are spent on testing?		
11/14/96	WV Association for Young Children 929 Stewart Street Morgantown WV 26505	Senate bill 300 refers to assessment. It does not have to be a group administered test. Research states these tests are inappropriate for young children.		
11/14/96	James I. Stealey 1812 Washington Avenue Parkersburg, WV 26101	As a parent I am concerned about the group administered standardized testing. I realize that children need to be given time to develop on their own. Standardized testing is an inappropriate method for evaluating young children and is going to put young children in a very frustrating situation. I respect and want the teachers in this state to continue to assess children through observation and documentation of their daily work. I would recommend a work sampling approach. I trust the teachers to make these assessments on an individual basis.		

Date	Individual/Organization	Comments	Action/Type	Rationale
11/14/96	North Central Affiliate of WV Association for Young Children 410 Worthington Drive Bridgeport WV 26330	The position of the National Association for the Education (95,000 members worldwide), the Southern Early Childhood Association, West Virginia Association for Young Children, and numerous other national education organizations is that group-administered standardized tests are unsuitable prior to grade three. THIS STATEMENT IS STRONGLY SUPPORTED BY RESEARCH.		
11/14/96	McKinley School 1130 19th Street Parkersburg, WV 26101	Metropolitan Readiness test is not developmentally appropriate for kindergarten. Paper and pencil testing is not an effective format of testing for children of kindergarten age.		
11/14/96	Rebecca J. Moore 120 South 1st Avenue Paden City, WV 26159	Counties need to be given an opportunity to align curriculum with what is being tested before test is administered. EX -- Freshman--World History--Tested on Am. History.		
11/14/96	Lori Butler 1204 WV Avenue Parkersburg WV 26104	Group administered standardized achievement tests are inappropriate for kindergarten. Such tests have been shown to measure very limited dimensions of literacy and numeracy development. These tests have also been shown to have deleterious effects on curriculum to the skills that are easily measured through multiple choice questions. I support a system of integrated curriculum and assessment in which teachers continually observe and document children's progress.		
11/15/96	Keith Herrick Magnolia High School 601 Maple Avenue New Martinsville WV 26155	Counties need to be given an opportunity to align curriculum with what is being tested before test is administered. EX -- Freshman--World History--Tested on Am. History.		
11/14/96	Belinda Phillips Magnolia High School 601 Maple Avenue New Martinsville WV 26155	Counties need to be given an opportunity to align curriculum with what is being tested before test is administered. EX -- Freshman--World History--Tested on Am. History.		

Date	Individual/Organization	Comments	Action/Type	Rationale
11/15/96	Nancy Jones Williamstown Elem School 418 Williams Avenue Williamstown, WV 26187	Group administered standardized achievement tests are inappropriate for kindergarten. Such tests have been shown to measure very limited dimensions of literacy and numeracy development. These tests have also been shown to have deleterious effects on curriculum to the skills that are easily measured through multiple choice questions. I support a system of integrated curriculum and assessment in which teachers continually observe and document children's progress.		
11/15/96	Eslier Lauderman Williamstown Elem School 418 Williams Avenue Williamstown, WV 26187	Group administered standardized achievement tests are inappropriate for kindergarten. Such tests have been shown to measure very limited dimensions of literacy and numeracy development. These tests have also been shown to have deleterious effects on curriculum to the skills that are easily measured through multiple choice questions. I support a system of integrated curriculum and assessment in which teachers continually observe and document children's progress.		
11/15/96	Kathy Morehead 2901 Fairview Avenue Parkersburg WV 26104	As a parent I am concerned about the group administered standardized testing. I realize that children need to be given time to develop on their own. Standardized testing is an inappropriate method for evaluating young children and is going to put young children in a very frustrating situation. I respect and want the teachers in this state to continue to assess children through observation and documentation of their daily work. I would recommend a work sampling approach.		
11/15/96	Darrel A. Ballard Magnolia High School 601 Maple Avenue New Martinsville WV 26155	Counties need to be given an opportunity to align curriculum with what is being tested before test is administered. Ex -- Freshman--World History--Tested on Am. History.		
11/15/96	Sherry Hetzel Jefferson County Schools	Met in groups representing RESA VIII - I believe these comments to be fair and valid.		

Date	Individual/Organization	Comments	Action/Type	Rationale
11/6/96	Eileen Poling TCEA & TVEMS 215 Homewood Street Parsons, WV 26287	\$126-14-2. Purpose Too much emphasis on standardized test score numbers that do not necessarily reflect the actual knowledge, ability, and problem solving skills of a student.		
11/6/96	Dianna Halstead Sherman Elementary Box 369 Comfort, WV 25049	The purpose of a statewide assessment program is to measure the educational progress of public school children. Therefore, I do not feel the test scores should be published in the paper and used by local boards of education to judge the competency of the classroom teacher. There are many factors that attribute to the testing ability and scores of students - the teacher being only one. It is this kind of pressure that often leads to testing misconduct - sad, but true! Don't you feel if the test was used to track students, instead of trample teachers, it would have more validity?		
11/12/96	Shelia Edwards Rt 3 Box 108B Washington, WV 26181	Instruction is NOT improved by the use of tests which are not age-appropriate. These tests measure very limited dimensions of literacy and numeracy development. They lead to "test-driven curriculum" and inappropriate teaching methods and activities for young children.		
11/14/96	Kim Underwood New Martinsville School Benjamin Drive New Martinsville, WV	Testing in March on things that have not been taught yet. Later date better to children.		
11/14/96	Connie Frye New Martinsville School Benjamin Drive New Martinsville, WV	Too much testing-actual instructional time is being lost. 4th grade - Statewide Assessment, Writing Assessment, and NAEPI		
11/14/96	Therese Hayes Rt 1 Box 149A Proctor, WV 26055	State Testing, Writing Assessment, NAEP, interruptions to teaching time?!		

Date	Individual/Organization	Comments	Action/ Type	Rationale
11/14/96	Patricia J. Bills 821 1/2 Fifth Street New Martinsville, WV Proctor, WV 26055	Why do so much testing with students. We need more		
11/14/96	Jo Kirk New Martinsville School 20 E. Benjamin Drive New Martinsville, WV	3.20 This section is to broad in its wording. It should be more specific in what is meant by misconduct.		
11/14/96	Flatwoods Elem School PO Box 130 Flatwoods, WV 26621	When will staff development be held for teachers concerning the implementation of the Statewide Program? When will the NAEP be given and how will students be randomly chosen?		
11/14/96	Mark Carl Fawcett Magnolia High School 601 Maple Avenue New Martinsville, WV 26155	Acceptable.		
11/14/96	Joanne Fawcett 210 Riverside Drive New Martinsville, WV 26155	Acceptable.		
11/14/96	Magnolia High School 601 Maple Avenue New Martinsville, WV 26155	Acceptable.		
11/14/96	Janice Kable Instructional Specialist Jefferson County Schools PO Box 987 Charles Town, WV 25414	The state assessment program should not guide the curriculum, as it appears is the case with the SAT9 and Policy 2520.		
11/14/96	Franklin Primary School Betty Lou Harris 1305 Washington Pike Wellsburg WV 26070	How will all the test data be used? Assessment can serve many important needs in the school; however, some care must be taken to insure it is used effectively.		

Date	Individual/Organization	Comments	Action/Type	Rationale
11/14/96	WV Association for Young Children 929 Stewart Street Morgantown, WV 26505	These tests are limited and are not age appropriate. They make the curriculum test driven.		
11/14/96	North Central Affiliate of WV Association for Young Children 410 Worthington Drive Bridgeport, WV 26330 Betty Lou Harris 1305 Washington Pike Wellsburg WV 26070	Assessment is important for providing children with suitable challenging curriculum and for diagnostic purposes. Large-scale achievement testing prior to third grade is not a wise use of resources. The national trend is to eliminate such testing in kindergarten, grades 1 and 2. Psychological harm (undue stress and frustration at a time when children are adjusting to people and surroundings, "test taking" stress) can be severe.		
11/14/96	Rebecca J. Moore 120 South 1st Avenue Paden City, WV 26159	Acceptable.		
11/15/96	Keith A. Herrick Magnolia High School 601 Maple Avenue New Martinsville, WV 26155	Acceptable.		
11/15/96	Velinda Phillips Magnolia High School 601 Maple Avenue New Martinsville, WV 26155	Acceptable.		
11/15/96	Braxton County Schools 411 North Hill Road Sutton WV 26601	We were informed last year at state meetings that all students would take the test since it would be normed for special education students. What happened to this? This made a great statement for high expectations for all students. What happened?		
11/15/96	Darrel A. Ballard Magnolia High School 601 Maple Avenue New Martinsville, WV 26155	Acceptable.		

Date	Individual/Organization	Comments	Action/Type	Rationale
11/6/96	Lawrence Hitt, Principal Shepherdstown Elementary 410 S. Church Street Shepherdstown, WV 25443	<p>§126-14-3. Program Regulations</p> <p>Clearer guidelines need to be given to counties. Some counties believe that they can use alternate forms of the test for preparation and others do not. I don't believe a principal can totally be certain that tests are used properly 100 percent of the time. We have to use common sense and have a sense of trust that everyone is using the tests properly. We need to make certain that county coordinators provide adequate training, etc. to teachers for this program. This policy doesn't address special education students. I know another policy does this, but shouldn't it be in this policy? It is my belief that in reviewing this, as well as other proposed policies, we are putting too much emphasis on achievement testing. I will state this concern on proposed policy 2510 as well.</p>		
11/13/96	Darla K. Edgell, Principal Washington District Elem Rt 7 Box 234 Buckhannon WV 26201	It is very inappropriate to require a group test to be given in kindergarten. This is not a developmentally appropriate practice for these students. ;		
11/14/96	Stephen E. Rogalski 20 E Benjamin Drive New Martinsville, WV 26155	Please define misconduct as stated ... "Documented misconduct."		
11/14/96	Karen Talbert 20 E Benjamin Drive New Martinsville, WV 26155	Please define misconduct. (Licenses being revoked for misconduct during testing procedures.)		
11/14/96	Barbara Quinet 20 E Benjamin Drive New Martinsville, WV 26155	"Documented misconduct: needs defined. Special education testing needs to be consistent throughout the state.		

Date	Individual/Organization	Comments	Action/Type	Rationale
11/14/96	Franklin Primary School Faculty Senate Betty Lou Harris, Chairman 1305 Washington Pike Wellsburg, WV 26070	<p>Some grades will be heavily tested. Example: 4th grade will be tested:</p> <ul style="list-style-type: none"> -Stanford Achievement -Listening Assessment -Writing Assessment -NAEP Assessment <p>This seems a lot of testing for these students to do at approximately the same time of the year. These assessments take time to administer and this time will be taken from class instructional time. Some of this time could be better utilized with instruction. We realize some standardized assessment may be needed but is so much needed for the same students? Also test scores do not always show the true learning going on in the classroom. It seems that too much emphases will be placed on achieving certain scores on all of these tests.</p>		
11/14/96	North Central Affiliate of WV Association for Young Children 410 Worthington Drive Bridgeport, WV 26330 Caroline Teets Kimberly Larry Janet Grimes Ken Phillip Monica Mathews Lori Stutler Carol Fultz Polly Steele Anne Coleman Theina Nutter Lizabeth Bucy Tonya Blackburn Pat Gruber Ceretina Haught Michelle Southern Betty Henderson Vicki Skinner	<p>As early educators we are strongly opposed to the group administered, standardized tests which will be given to children in Grades K-2 as a result of the West Virginia Department of Education's interpretation of Senate Bill 300. Research and child development experts tell us that such tests can produce psychological stress, intellectual harm and encourage teachers to teach to the test instead of to the development of the child. Young children are not physically ready to take such long formal tests. We have no objections to assessments of young children. Teachers do it daily for diagnostic and curriculum development purposes. The Metropolitan Readiness Test and other types of formal tests are simply not appropriate for young children and are not accurate assessment tools. Early childhood experts are not being consulted; they have been left out of any decision making pertaining to the testing policy. Large-scale achievement testing in the early grades is not sound early childhood practice and is not a wise use of resources. Please support amending Senate Bill 300 to eliminate this form of assessment in Grades K-2. Thank you for your attention to this matter.</p>		

Date	Individual/Organization	Comments	Action/ Type	Rationale
11/14/96	<p>Rebecca J. Moore 120 South 1st Avenue Paden City, WV 26159</p> <p>Keith A. Herrick Magnolia High School 601 Maple Avenue New Martinsville, WV 26155</p> <p>Velinda Phillips Magnolia High School 601 Maple Avenue New Martinsville, WV 26155</p> <p>Darrel Ballard Magnolia High School 601 Maple Avenue New Martinsville, WV 26155</p> <p>Joanne Fawcett 210 Riverside Drive New Martinsville, WV 26155</p> <p>Mark C. Fawcett Magnolia High School 601 Maple Ave New Martinsville, WV 26155</p>	<p>3.1 3.5, 3.8 - At any particular year, some 8th graders will be taking 4 separate tests -- Regular Statewide Assessment Test, Listening Component and ACT Explore, plus NAEP.</p> <p>3.6 - Work Keys test in 12th grade is too late to incorporate appropriate remediation and schedule changes during senior year. Given possibly spring of 11th grade?</p> <p>3.7 - Will exceptions be offered for extended illness?</p> <p>3.5 - Exemption or altered procedures for Special Ed. students.</p> <p>3.8 - What is the NAEP Test? If it is simply a research method, can't existing test data be utilized, without giving another test?</p> <p>What is the criteria for determining which schools, students, number of students, and subjects to be tested?</p>		

Date	Individual/Organization	Comments	Action/Type	Rationale
11/12/96	Sheila Edwards Rt 3 Box 108B Washington, WV 26181	3.1 - Group-administered standardized tests are not appropriate before third grade. Mandating the use of such tests K-2 is a giant step backwards in the movement to improve West Virginia's educational system. Early childhood professionals were not adequately represented on the committee which chose this form of assessment for K-2.		
11/14/96	WV Advisory Council for the Education of Exceptional Children 100 Angus E Peyton Dr. S. Charleston, WV 25303 20 E Benjamin Drive New Martinsville, WV 26155	3.1 - The Council would refer to their 1996 Annual Report and the recommendations regarding Large Scale Assessment. We have concerns about the use of test results and believe more specificity may be needed to justify not testing identified exceptional students.		
11/14/96	Linda Fonner, Teacher New Martinsville School 20 E. Benjamin Drive New Martinsville WV 26155	3.1 - Will there be guidelines on which students may have it in their IEP's to be excused from testing? If not, some counties will excuse most, just to raise their overall scores.		
11/14/96	WV Association for Young Children 929 Stewart Street Morgantown, WV 26505	3.1 - Group-administered standardized tests are not appropriate before third grade. This is a step backwards for WV.		
11/17/96	Jo Anne Cyrus, Teacher Milton Elementary School 1201 Pike Street Milton, WV 25541	3.2 - First grade students are not developmentally ready for a standardized test. It is very difficult to determine what a six year old knows by this measuring device. The child might possibly be having trouble with the logistics of the test. Reconsider your position on testing first graders. They need to have more time to be prepared for a standardized test.		
11/14/96	Elizabeth Potterfield Sherman Elem. School PO Box 369 Cornfort, WV 25049	3.2 - Why are some counties giving the entire test to all 1st/2nd graders, while others are giving only portions of the test to these grades? I would like to see consistency from one county to the next.		

POLICY 2340: THE STATEWIDE ASSESSMENT PROGRAM
COMMENT LOG
NOVEMBER 15, 1996 - NOVEMBER 20, 1996

ACTION
N: No Response
NA: Not Accepted
A: Accepted

TYPE
- Negative
+ Positive
O Neutral

Date	Individual/Organization	Comments	Action /Type	Rationale
11/15/96	James Murphy Calhoun High School Grantsville, WV 26142	§ 126-14.1. General The ACT Work Keys test is an insult to WV students.		
11/15/96	Joyce Chapman Winchester Ave School Berkeley County	Locked storage areas not available in all schools. Much time involved in returning tests after each session. Having test coordinator available to check in and out.		
11/15/96	VanDevender Jr High Faculty Senate 918 31st Street Parkersburg WV 26101	The testing programs are not correlated to the current curriculum of West Virginia schools. We feel that the testing goals, although good in theory, are unrealistic. With these goals and objective in mind, too many teachers will be "teaching the test," rather than teaching the skills and content the students will need to be successful in their future.		
11/15/96	Jo Kirk New Martinsville School 20 E. Benjamin Drive New Martinsville, WV	Why does testing need to be completed in March? Everything has not been taught that could be on the test. Is it a problem that test is written by one publishing company? Too much testing time.		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/15/96	Joyce Ireland 2435 Elm Street Parkersburg, WV 26101	Standardized testing for young children (kdg) is developmentally inappropriate. Children need to be assessed, but standardized testing does not take into account attention span, different levels of children's abilities, broken homes, socioeconomic levels, progress made throughout the year. (Which portfolio assessment would be more important to a teacher) For example, asking children to do a 2 step mathematical problem which is abstract for a young child and asking them to solve it without concrete materials contradicts everything that Piaget has told educators about levels of learning - concrete operations.		
11/15/96	Pamela Jackson Teacher	Stanford Achievement Test - The test does not appear to be closely correlated to the state curriculum especially in the area of social studies. The secondary level test requires knowledge of areas which the student may not have studied since elementary classes or never. For example, the 9th grader will be asked to compare WW1 with WWII. That study is included in the 11th grade course. A 10th grader will be asked questions about the War Powers Act of 1973, the Brown v Bd. Of Ed. 1954 decision, or the goals of the New Deal, all of which are in the 11th grade course. And in the 11th grade test students must know the cause for the fall of the Roman Empire which is not in the 20th century. Too much time will be needed out of the current study to review for assessment. Work Keys - I administered this test this fall and in my opinion it is not a good test. The video segments on teamwork stereotyped career individuals, were difficult to see and read, bored the students and encouraged group response to answers. Students laughed aloud at some of the dialogue and situations.		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/16/96	<p>William Aberegg 254 Long Drive New Martinsville, WV 26155</p>	<p>Counties need to be given an opportunity to align curriculum with what is being tested before test is administered. Ex: Freshman - World History - tested on American History.</p>		
11/16/96	<p>Nettie Jo Herrick 1225 Robin Drive New Martinsville, WV 26155</p>			
11/16/96	<p>Magnolia High School 601 Maple Avenue New Martinsville, WV 26155</p>			
11/16/96	<p>Larena Higginbotham Magnolia High School 601 Maple Avenue New Martinsville, WV 26155</p>			
11/16/96	<p>Joe McClung, Principal PO Box 10 Meadow Bridge WV 25976</p>	<p>Perhaps we test too much - too high a regard on tests only. There are other indicators of success.</p>		
11/16/96	<p>Margaret Kursey Valley View Elementary Rt 4 Box 269 Martinsburg, WV 26501</p>	<p>It is a proven fact that SAT and Achievement test scores are improved by a strong fine arts program. Why devalue their importance in the overall education of young children? If so, the quality of grades 9-12 fine arts programs will suffer, as well as their students. Elementary art, music, p.e. classes should never be eliminated. They are part of a "well rounded education".</p>		
11/16/96	<p>N. Sutphin Sherman Elementary PO Box 369 Comfort WV 25049</p>	<p>Why are children tested year after year? It seems that they are over-tested.</p>		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/16/96	<p>Nancy Woody Nellis Elementary 705 Lincoln Avenue Madison WV 25130</p> <p>Marianna Lyon 114 Central Street Madison WV 25130</p> <p>Bryan Elkins Box 13 Ashford WV 25009</p> <p>Donna Roberts PO Box 146 Bloomingrose WV 25024</p> <p>Helen Arbogast 361 CCR Jullian WV 25529</p> <p>Sherry Waugh PO Box 356 Glasgow WV 25086</p> <p>Lisa Lowe HC 64 Box 327 Ashford WV 25009</p>	<p>§ 126-14.3. Program Regulations</p> <p>3.1 and 3.3 - "Special education students may be excused if documented in their Individualized Education Program (IEP)." Each test needs to be listed individually on the IEP. Therefore, the educator would know the specific test the student is excused from. The IEP forms currently being used says "Will or will not participate in the testing program."</p> <p>Additional Comment: It would be very beneficial if the West Virginia Board of Education would adopt a statewide Standardized Individualized Education Program (IEP) document.</p>		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/16/96	Kevin Boggs WVEA President 1558 Quarrier Street Charleston, WV 25311	3.1 - The Association applauds the move of the test to the spring.		
11/16/96	Donna Heuneman Executive Director WV Developmental Disabilities Planning Council 110 Stockton Street Charleston, WV 25312	Both Sections 3.1 and 3.3 note that special education students may be excused from the statewide assessment program if documented in their IEP. While this may be appropriate for some students with disabilities, particularly those with very significant disabilities (a small percentage), the Council is concerned that teachers will be inclined to automatically exempt all of their students who have IEPs, thereby limiting opportunities for those children. We believe that some type of monitoring should be in place to ensure that students with disabilities participate in the assessment program with appropriate accommodations.		
11/20/96	Brenda Chapman Millon Elementary 1201 Pike Street Millon, WV 25541	3.2 - Standardized testing is not designed in a developmentally appropriate way for first and second grades. The format for marking the answers on a standardized test are often very difficult for young children. Testing of a young child causes great stress and the learning that takes place with a young child is not always seen on a standardized test. I urge you to reconsider using standardized testing of first and second grade children.		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/15/96	Braxton County Schools 411 North Hill Road Sutton, WV 26601	<p>3.3 - Title I regulations require that reading and math services be offered (in a prioritized manner) to students at or below the 50th percentile. Title I regulations also require that special education students not be excluded from receiving Title I services. Currently, when committees meeting for IEP developing purposes decide that a student should not take the test, they write that h/she should not take the entire test. I think this policy should require that justification be written for each area as to why a student should not take reading, math, etc., as related to his/her learning disability. At this time, they should also consider, prior to deciding the child should not take the test, whether or not they plan to recommend this child for Title I reading and math services. What is happening now is that a decision is made that a child not take the entire test, and the child is then recommended for Title I reading or math services. Even though the learning disability may have been math, for example, test information in the area of reading may not be available. The Title I teacher is forced to give these tests by hand if they get the needed information. This area has been too vague and the potential for manipulation is too great. This would be a good time to deal with this.</p>		
11/12/96	Dianne Boggess Wood County Schools 1210 13th Street Parkersburg, WV 26101	<p>Sections 3.4, 3.5, and 3.6: A question that may need to be addressed - May students be excused from taking these tests if documented in their IEP?</p>		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/12/96	Shelia Edwards Rt 3 Box 108B Washington, WV 26181	3.4 - The Metropolitan Readiness Test is a waste of time, money, and effort. Kindergarten teachers should be supported in using more appropriate forms of assessment and record keeping. There are more effective, efficient, and useable methods of assessing our younger students K-2. Early childhood professionals were not adequately represented on the committee which chose this form of assessment for K-2.		
11/14/96	WV Association for Young Children 929 Stewart Street Morgantown, WV 26505	3.4 - The Metropolitan Readiness Test is a waste of time and money.		
11/14/96	McKinley School 1130 19th Street Parkersburg, WV 26010	3.4 - Not developmentally appropriate for kindergarten. Paper and pencil assessment is not an effective format for children of kindergarten age.		
11/14/96	Janice Kable Instructional Specialist Jefferson County Schools PO Box 987 Charles Town WV 25414	3.4 - Testing of kindergarten students needs re-examination. These children are too young for a testing program.		
11/15/96	Kevin Boggs WV/EA President 1558 Quarrier Street Charleston, WV 25311	3.4 - Make sure the K, 1, and 2 assessments are not for comparison and publication but only for assessing student progress and instructional needs. Ensure that classroom teachers will not be forced to grade the Writing Assessment in grades 4, 7, and 10 without compensation and release time (substitute pay included). The WV/EA is committed to ensuring that norm referenced test data is used for comparison and program assessment only. In no way should student test assessment be used in employee discipline or evaluation.		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/15/96	Susan C. Lamp 1616 25th Street Parkersburg, WV 26101	3.4 - I oppose kindergarten assessment by the use of the Metropolitan Readiness Test. Early childhood experts oppose this type of testing for 5-6 year olds. No experts were on your panel to choose this test. You chose the test of them developed the objectives for the teachers to teach from. This is totally contrary to all known educational standards. In policy 2510, 126CSR42.3 you, the Department of Education, are to "encourage the use of best practices _____ assessments." You have not done this with regard to the choice of assessment tool for kindergarten assessment and I will, as a parent, hold you liable for any damage done to my daughter if this testing occurs. You have further and more expert opposition to this assessment from the early childhood experts - please listen to them.		
11/15/96	Berkeley Heights Elem. Faculty Senate Rt 5, Box 490 Martinsburg, WV 25401	3.4 - Kindergarten should not be tested if the results are not accounted for. Children are still too young, and the life experiences up to that point are not equal. There is always the side range of maturity levels that need to be accounted for at that age level.		
11/19/96	Dr. Barbara Fassig Ohio County Schools 2203 National Road Wheeling, WV 26003	3.4, 3.5, 3.6 - Add: Special education students may be excluded if documented in their IEP.		
11/14/96	Flatwoods Elementary PO Box 130 Flatwoods, WV 26621	Care needs to be given that IEP's are followed concerning Special Education students being excused from testing. 3.5, 3.6 - What about Special Education and IEP's?		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/14/96	<p>Charles Duffy RESA VIII 109 S. College Street Martinsburg, WV 25401</p> <p>Gerald Mathias, Supt. 46 S. High Street Romney, WV 26757</p> <p>Janice Kable Instructional Specialist Jefferson County Schools PO Box 987 Charles Town, WV 25414</p> <p>Gail Sherman Jefferson County Schools 110 Mordington Avenue Charles Town, WV 25414</p> <p>Dr. Nancy Kilmon Berkeley County Schools 401 S. Queen Street Martinsburg, WV 25401</p> <p>William Hudgins Grant County Schools 204 Jefferson Avenue Petersburg, WV 26847</p> <p>Jane Kitzmiller Mineral County Schools One Baker Place Keyser, WV 26726</p> <p>Sherry Hetzel Jefferson County Schools 110 Mordington Avenue Charles Town, WV 25414</p>	<p>3.5 - ACT Explore assessment results should not be used for accreditation purposes and scores should not be summarized for schools and counties. Scores should be used for planning for student needs only.</p> <p>3.6 - ACT Work Keys assessment results should not be used for accreditation purposes and scores should not be summarized for schools and counties.</p> <p>* Will lead to poor teaching techniques and test driven curriculum when apples are compared to oranges. (One school to another, one county to another.) Students will suffer!</p>		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/14/96	Rose Kessinger PO Box 161 Parsons, WV 26287	3.5 - ACT Explore was chosen as an interest inventory, not an achievement test. 8th graders do not need 2 achievement tests in one year!		
11/14/96	Michael Kessinger Principal Tucker Valley Elem/Mid 100 Crest Avenue Hambleton, WV 26269	3.5 - The ACT Explore is more an achievement test than an interest inventory. I believe another test should be considered.		
11/15/96	Musselman Middle Faculty Senate Rt 2 Box 119 Bunker Hill, WV 25413	3.5 - Too much testing, especially in 8th grade. COPS/CAPS and ACT Explore serve duplicate functions so because of time and money, one should be canceled. How much money is currently being spent on these tests by the State and by the county? What follow up is necessary if NAEP tests such a smart part of the grade population (50 out of 250??)?		
11/14/96	Athena Staviakis Sherman Elementary Rt 3 Box 369 Comfort WV 25049	In reference to 3.8, is the NAEP component of the SAP the competency test for grades 4, 8 excused from testing. , and 12 in which the student does not progress to the next level if he does not meet a standard score?		
11/14/96	Ellen Shodgrass Sherman Elementary Po Box 369 Comfort, WV 25049	3.9 - The county test coordinators shall provide training to all teachers and counselors who administer the tests. I question where the funds will come from to pay the individuals receiving training.		
11/14/96	Flatwoods Elementary PO Box 130 Flatwoods, WV 26621	3.9 - When will the training by the county test coordinator for teachers take place? Care should be given as to unethical procedures and misuse of the testing materials.		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/14/96	Linda Fanner, Teacher New Martinsville School 20 E Benjamin Drive New Martinsville, WV 26155	3.9 - When will these trainings be held?		
11/14/96	Dianne Boggess Wood County Schools 1210 13th Street Parkersburg, WV 26101	3.9 - Rewrite last sentence to read - county test coordinators shall meet prior to test administration with school administrators (building level test coordinators) who in turn will provide training to all teachers who administer the tests. Rationale: The overall coordination and administration of the school testing program is the responsibility of the school administration. Teachers and counselors work together to help in this process. School counselors assist in the interpretation of test data to teachers, administrators, parents and the community (addressed in section 3.14). School counselors use test data in their work with students to help them monitor and manage their learning including their personal and career development. School counselors should not administer the test, but under the direction of the school principal may provide the coordination necessary for the school testing program. Also, if the statement requiring the county test coordinator to train all teachers and counselors who administer the test would remain - in my case with 28 schools (30 including the alternative centers), I would be training well over 600 people. Seems a little overwhelming and not very efficient or productive.		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/14/96	Dr. Donna Martin Assistant Superintendent Lincoln County Schools 10 Marland Avenue Hamlin WV 25523	<p>Program Regulation #10 - This allows practice tests, alternate forms, test improvement programs and technology to be used to prepare students to take the test. This is basically unfair to counties who are financially strapped and thus cannot afford practice, alternate forms, etc. to prepare for the test - other than effective testing of the instructional objectives. Require everyone to play on a level playing field (no practice tests, etc.), or provide financial support to ensure that all counties have the same resources available to prepare students for the test.</p> <p>Program Regulation #11 - Storing test booklets in a central location is not appropriate logistically in our county. All schools already have a secure place to store testing materials. Also, the time to annually inventory, pick up, and distribute these materials puts unnecessary strain on an already overworked, small central office staff. If a teacher or administrator wishes to compromise test results, they can easily make a copy of the tests for use throughout the year. Storage of booklets in a central county location will not accomplish the objective of ethical testing behavior; it will simply add more work and storage problems for county test coordinators.</p>		
11/15/96	Berkeley Heights Elem Faculty Senate Rt 5 Box 490 Martinsburg, WV 25401	3.10 - This section needs to be more specific. Are we talking test security or copyright laws?		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/19/96	Dr. Barbara Fassig Ohio County Schools 2203 National Road Wheeling, WV 26003	3.11 - Test booklets should be secured, but there is a tremendous problem in storing all booklets in a central location, counting them at the central level before and after testing, and distributing and collecting them within one to two days. Principals at each school should be responsible at all times for the security. Therefore, the booklets could be stored at the individual schools. Those that will violate security will do it whether the booklets are there on a full time basis or just during the week of testing.		
11/15/96	Michael J. Kelly 142 Columbia Avenue Wheeling, WV 26003	3.9 - 3.12 - Training and staff development for teachers to administer the tests and interpret and use the test results. Has anyone analyzed the staff development being requested/required/needed by the various policies related to implementing Senate Bill 300 (not to mention the staff development needs in individual counties) to see if the needs/requirements will outweigh the time available in the calendar?		
11/6/96	Connie Cantley Sherman Elementary PO Box 369 Comfort, WV 25049	3.12 - Each county will provide staff development for test administration and interpretation of the test. Who will compensate the staff for this training?		
11/15/96	Mussellman Middle Faculty Senate Rt 2 Box 119 Bunker Hill, WV 25413	3.12 - States that the county will provide staff development programs for test administration and interpretation. This would be nice and something new.		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/12/96	Dianne Boggess Wood County Schools 1210 13th Street Parkersburg, WV 26101	3.13 - "the administration and use of the Statewide Assessment Program test results" - what does this mean? What is the administration of test results? Will there be a form developed to give county test coordinators guidelines when preparing this outline or overview?		
11/14/96	Linda Fonner, Teacher New Martinsville School 20 E Benjamin Drive New Martinsville, WV 26155	3.14 -Why are NAEP test results not given out?		
11/16/96	N. Sulphin Sherman Elementary PO Box 369 Comfort, WV 25049	3.14 - When parents and students are given the opportunity to have the test results explained and/or interpreted to them by trained professional staff, when would this occur. Test results are enclosed in students final report card (end of year), and staff members are on vacation from this time.		
11/19/96	Dr. Barbara Fassig Ohio County Schools 2203 National Road Wheeling, WV 26003	3.14 - Add: parents and students shall be informed of the individual student test results by the principal and/or grade level teacher at each individual school.		
11/6/96	Bonnie Ritz Ohio County Schools 2203 National Road Wheeling, WV 26003	3.15 - Test security is vital. All student test data should be kept locked. A locked, secured room is adequate.		
11/15/96	Lyn Guy, Supt. Monroe County Schools Box 330 Union, WV 24983	3.15 - The kindergarten test promotes a more academic structure than is developmentally appropriate.		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/12/96	Dianne Boggess Wood County Schools 1210 13th Street Parkersburg, WV 26101	3.17 - Writing Assessment given in grades 4, 7, and 10. Additional questions: Do additional instructions need to be included in this policy with regard to testing of students in alternative schools, alternative settings, or out-of-school environment placements? What is the county responsibility for the testing of home schooled (test security would be a nightmare) and private school students? I hope none.		
11/14/96	Nora Dolson Sherman Elementary PO Box 369 Comfort, WV	3.18 & 19 - address the review and investigation or irregularities in testing, (administration or other practices.) It is stated that these procedures are outlined in the Testing Code Ethics provided to all county test coordinators. This leaves a question in my mind as to the exact definition of "irregularities." Aside from the obvious, specific procedures should be available to all schools and teachers. Additional questions: Do additional instructions need to be included in this policy with regard to testing of students in alternative schools, alternative settings, or out-of-school environment placements? What is the county responsibility for the testing of home schooled (test security would be a nightmare) and private school students? I hope none.		
11/15/96	Greg Richmond New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	3.20 -Wording is to broad. Define misconduct. Testing needs to be consistent on county by county basis. This is especially true for special education students.		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/15/96	Cindy Riley 20 E. Benjamin Drive New Martinsville, WV 26155	3.20 -Clarify document misconduct. Special education testing needs to be consistent throughout state.		
11/15/96	Patricia Sullivan New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	3.20 -Licensure pulled by misconduct (define). Misleading. How will it be measured? Could be taken out of context. Testing of special education students should be consistent from county to county, school to school, etc.		
11/15/96	Connie Frye New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	3.20 -This appears very broad and dangerous. Define misconduct. Testing of special education students needs to be consistent on county by county basis.		
11/15/96	Cynthia Weber New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	3.20 -License pulled by misconduct too general. Please define.		
11/15/96	George G. Wilson 409 Edgewood Terrace New Martinsville, WV 26155	3.20 -Define "documented misconduct" concerning handling of test materials. There are many inconsistencies among the counties as to who should take the test and who shouldn't.		
11/15/96	Therese Hayes Rt 1 Box 149A Proctor, WV 26055	3.20 -License pulled for testing irregularities, define "documented misconduct". This must be addressed with intense specificity. Testing of any identified special ed students must be consistent throughout the state. Those we've tried to "include" who are constantly disruptive and non cooperative now need to be "included" at the cost of test results of all other students.		

Date	Individual/Organization	Comments	Action /Type	Rationale
11/15/96	Emily Fenton 651 Maple Avenue New Martinsville, WV 26155	3.20 - "Misconduct" please be specific and define documented misconduct".		
11/15/96	Pat Wildman 655 James Street New Martinsville, WV 26155	3.20 -Misconduct needs to be defined. Testing of special needs students must be consistent from county to county.		
11/15/96	Patricia Bills 821 ½ Fifth Street New Martinsville, WV 26155	3.20 -The term "misconduct behavior" should be clarified concerning assessment. Please, how will all counties be accountable on testing of special education students. What keep all counties finding loopholes to exclude the special ed students! Testing need to be consistent county to county.		
11/16/96	Janice Kasserman New Martinsville School 20 E Benjamin Drive New Martinsville, WV 26155	3.20 - " Documented misconduct" needs defined. Special ed testing needs to be consistent throughout state.		
11/16/96	Kim Underwood New Martinsville School 20 Benjamin Drive New Martinsville, WV 26155	3.20 -Documented misconduct needs defined.		