



Date: December 8, 2020

To: Jeffrey C. Riley, Commissioner  
Massachusetts Department of Elementary and Secondary Education

From: Massachusetts Association of Teachers of Speakers of Other Languages (MATSOL)  
Multistate Association for Bilingual Education (MABE)

Re: 2021 ACCESS for ELs testing

Dear Commissioner Riley,

On behalf of our over 2,500 members, including ESL teachers, bilingual teachers, EL and bilingual program directors, and other English Learner (EL) educators in Massachusetts, **MATSOL and MABE urge the Department of Elementary and Secondary Education to cancel ACCESS for ELs testing in the 2020-21 school year.** On December 7, 2020, the Department notified school districts that the testing window has been extended for a second time, allowing testing from January 7 through May 20, 2021, and ELs are expected to test in person in their district “to the greatest extent possible.”

Our concerns about testing remain, especially any testing that takes place during the winter months. In-person testing is still highly problematic as long as the COVID-19 pandemic continues. We believe that the most important consideration is how ACCESS testing this year will impact on our students. **Going forward with testing this school year will have a negative impact on English Learner students and families, furthering educational inequity.** Included in this letter is a summary of input collected from MATSOL and MABE members -- educators working with English Learners – who are concerned about ACCESS for ELs testing during the pandemic.

If testing goes forward:

1. Students, their families, teachers, and school staff will be put at greater risk for exposure to COVID-19.
2. Learning will be disrupted and students will likely receive less ESL instruction during the testing window, at a time when there are already concerns about equity and the amount of instructional time students are receiving.

3. Districts will have to use valuable time and resources preparing for and administering the test, instead of directing those resources to instruction and student support.
4. ACCESS test data will be incomplete and invalid due to low student participation and the extraordinary circumstances in which students will have to take the test.
5. ACCESS for ELs is a summative high stakes test.<sup>1</sup> Test results will not be returned to teachers until May (or later), so the results will not be helpful to teachers in planning instruction for this year.

We support annual assessment of student progress in developing English language proficiency, as required by federal and state law. ACCESS for ELs was successfully administered last January and February of 2020 before the pandemic, and we expect it to be safe to administer it again in 2022. Language proficiency assessment benefits students because the data helps to ensure that English Learners receive appropriate placement and instruction for their language level, to monitor the students' progress in developing English proficiency, and to determine when students can be reclassified and exit EL programs. However, during this extraordinary year, the disruption and harm of administering ACCESS for ELs in person outweighs the benefits.

Whether or not ACCESS for ELs testing is cancelled, there are several issues that need to be addressed in a situation when some or all ELs do not take the test:

1. **School districts should not be penalized for low student participation in the ACCESS for ELs test during the pandemic.** As of this date, the Department has not decided about how lack of participation will affect district accountability measures. Likewise, schools and teachers should not be penalized if students do not meet English Proficiency Benchmarks. The Department needs to address how students' English Learner Success Plans will be impacted.
2. If the testing goes forward, **the Department should provide Districts with a clear message to send to families stating that if a family does not feel safe sending their child to school for testing, they do not have to take the test** and that the student and family will face no negative consequences. The Department should assist districts with this communication by providing the message **in English and translated into the most**

---

<sup>1</sup> "ACCESS for ELLs is based on the WIDA English Language Development standards and administered once annually to ELs in K-12 in January-February. It is a standards-based, criterion-referenced English language proficiency test designed to measure ELs' social and academic proficiency in English. It assesses social and instructional English used within the school context as well as the language associated with language arts, mathematics, science, and social studies across the four language domains (listening, speaking, reading, and writing). The scores produced by ACCESS for ELLs will identify which proficiency level an EL has achieved at the time of the assessment (mid-year) in each of the single domains of speaking, listening, reading, and writing and the composite areas of literacy, oral language, and overall proficiency." From: Department of Elementary and Secondary Education. "Guidance on Placement, Progress Monitoring and Reclassification Procedures of English Learners." *Identification, Assessment, Placement, & Reclassification of ELs*, 2019. Page 4.

**common languages.**<sup>2</sup> Families can then decide what is best for their child.

3. Under current guidelines, students can only exit EL programs with a minimum ACCESS score, along with other relevant data including local assessments, MCAS, grades, observations, and the WIDA Performance Definitions to determine “whether students can perform ordinary classroom work in English.” This year, **districts should be allowed to use other evidence of language proficiency** to reclassify ELs and exit them from EL programs without the ACCESS score.<sup>3</sup>

Thank you for addressing these important issues and we look forward to continuing our work together to support English Learners and their families in the Commonwealth.

---

<sup>2</sup> “The Department provides resources for districts and families in multiple languages with the goal of effectively engaging families of ELs to make informed decisions about their children's education and contribute to the success of their schools.” Department of Elementary and Secondary Education, “Pillar 1: School Culture; Block 3 Effective Family Engagement; Level: State.” *Massachusetts Blueprint for English Learner Success*. Retrieved 12/5/2020 from <https://www.doe.mass.edu/ele/blueprint/pillar1/p1b2-state.html>

<sup>3</sup> Department of Elementary and Secondary Education. “Guidance on Placement, Progress Monitoring and Reclassification Procedures of English Learners.” *Identification, Assessment, Placement, & Reclassification of ELs*, 2019. Page 6-8.

## 2021 ACCESS for ELs Testing: View from the Field

MATSOL and MABE have collected input from our members – educators working with English Learners – who are concerned about ACCESS for ELs testing during the pandemic. Below is a summary of their concerns:

### 1. Health and Safety

**We are concerned that students, families, and school staff will be put at risk of contracting and spreading COVID-19 by participating in ACCESS testing.** The COVID-19 pandemic is worsening and although we await the availability of a vaccine, health experts do not predict a significant change in the infection risks until well after March 2021.

- A. It is inequitable to require one subgroup of students to come into school buildings during January-March when other students are not required to take the same risk.
- B. Families have been given a choice about whether to send their students to school buildings for in-person learning. Families that chose remote learning should not be asked to bring their students for in-person testing.
- C. Districts have been given local control in determining when and how schools are open to in-person learning, based on local COVID-19 metrics. This policy undermines local control.
- D. The timing of the tests is problematic. The testing window from January 7 to March 11 follows the Winter and February vacations when people may travel, further increasing the risk.
- E. EL student populations are vulnerable. A majority of English learners reside in communities with high rates of COVID-19, including Boston, Worcester, Springfield (Red), Lynn, Lowell, Lawrence, Chelsea, Revere, New Bedford, Fall River, and Brockton. These students and their families are also at high risk due to race, ethnicity, and socioeconomic factors. For example, in Worcester, Latino children in the 0-17 age range are about 4 times as likely to test positive as their White, non-Hispanic counterparts. The year-to-date positivity rate for Latino children in Worcester is 12.2%. Asking families of ELs who are predominantly Latino to send their children to school for ACCESS testing is neither equitable nor sound public health practice.

### 2. Impact on Students and Families

**We believe that ACCESS for ELs testing during the pandemic is inequitable and will not benefit EL students.**

- A. Teachers and schools have been working hard to create positive relationships with students and develop regular schedules and effective instructional practices in ever-changing circumstances. Many students are already overwhelmed and stressed because of the many challenges created by the pandemic. Testing will cause disruption in these routines and connections and may undermine the progress made in the past months.



- B. Teachers and schools have been working hard to develop positive partnerships with EL families, a vital component of student success. In a remote context, teachers face ongoing challenges communicating with parents and guardians through technology, and in securing the resources for translation and interpretation that are required for strong two-way communication between families and schools. Telling families that they must bring their children into school buildings for testing while not providing information (in a language they can understand) or acknowledging family concerns undermines the family-school partnership.
- C. Remote and hybrid learning create a learning environment that is difficult for students to stay motivated and to stay in the routine of learning. Disrupting their learning for even a week will cause harm.
- D. Taking a standardized test can be scary or worrying for students, especially in the current context. Teachers have not had the opportunity to prepare students for taking the test, as they do in normal years. Some students may be coming into the school building for the first time all year for testing. This may add to the stress students are already experiencing and cause them to perform below their abilities on the assessments.
- E. Students will have to wear masks while completing the recording for the Speaking section of the test. This is not optimal for recording a speaking sample and will likely also contribute to lower scores.
- F. Testing may create extra demands on families who will be required to arrange for transportation, take time off from work, care for younger siblings, and make other accommodations in order to bring their students in for testing.
- G. ACCESS testing will not have immediate impact on instruction since test scores are not available to teachers for months (usually May, but this year date “TBD”<sup>4</sup>). The data is used for monitoring progress, placement and exit from programs, and planning future instruction, not to help teachers plan current instruction. Furthermore, any testing data collected will be incomplete because of families that opt not to do in-person testing. Results for students taking the test may be invalid due to the circumstances in which testing takes place.

### 3. Scheduling & Impact on ESL Instruction

**We believe that the harm caused by interrupting ESL instruction for the test vastly outweighs any benefit of eventually having the testing data.**

- A. In a normal year, ACCESS testing often interrupts ESL instructional time. The ACCESS test must be administered by trained test administrators, who are usually the district ESL teachers. During the testing window, many districts must stop or curtail ESL instruction while the ESL teachers administer the tests. This will have more of an impact this year with

---

<sup>4</sup> Department of Elementary and Secondary Education. ACCESS for ELLs Test Coordinator Training (Presentation Slides). Fall 2020. Slide 14.

the longer testing window and will disproportionately impact districts with higher student to ESL teacher ratios. ESL instruction may stop for the full testing window in order to ensure everyone can test with social distancing rules. While taking the tests, students may also miss their other classes as well. With so many challenges for delivering the required ESL instruction to students, our students need more instructional time, not less!

- B. The ACCESS test is a four-part assessment of English language proficiency, with a test for each of the four language domains (listening, speaking, reading, and writing). We are not aware of any districts where all four parts are administered in one day. Based on reports from our members, the 4 tests are most often administered over two, three or four days of testing because teachers have found that students become fatigued and cannot perform up to their potential when they take all four parts on the same day. This year the testing will take longer than normal. Students will be tested in smaller groups because cohorts (in-person and virtual) cannot be merged, and fewer students will be allowed in testing rooms due to safety guidelines. In addition, extra time will be needed to prepare devices brought in by the students for testing and for room sanitation.

#### 4. Beneficial Allocation of Resources

**We believe that these resources would be better used to focus on student instruction and support, not testing.** Districts will have to allocate additional staff time, funding, and other resources to prepare for test administration.

- A. For online ACCESS for ELs testing, the Department suggests either using sanitized devices that are in school, or having students bring their devices in for the test. Updated software must be installed in order to run the test on all devices, putting additional pressure on IT departments that are already overwhelmed with the technology issues of remote and hybrid learning. Many districts have sent all their devices home with students to support student learning. Requiring students to bring in their computer has challenges: The district would have to ensure in advance of the testing day that the computer works correctly, install the updated software, and make sure devices are properly cleaned and sanitized. ACCESS also requires a headset, and schools have also deployed their headsets to students. Between tests, the student would not be able to take home and use the device for schoolwork.
- B. For districts that have devices on site, there are questions about how to sanitize them between users. Rooms will need to be set up for ACCESS testing, and districts will have to clean and sanitize rooms between test groups and ensure that everyone has the appropriate PPE.
- C. All these measures will require additional funding for already strapped districts.