

**AS INCLUDED IN PUBLIC AGENDA**  
**STATE BOARD OF EDUCATION**  
**ADMINISTRATIVE CODE**  
**COMMENT/RESPONSE FORM**

This comment and response form contains comments from and since the August 1, 2018, meeting of the State Board of Education when the rulemaking was considered at Second Discussion Level.

**Topic:** Standards and Assessment      **Meeting Date:** October 3, 2018  
**Code Citation:** N.J.A.C. 6A:8      **Level:** Proposal  
**Division:** Academics and Performance      **Completed by:** Division of Academics and Performance

**Summary of Comments and Agency Responses:**

The following is a summary of the comments received from State Board of Education (State Board) members and members of the public and the Department of Education's (Department) responses. Each commenter is identified at the end of the comment by a letter or number that corresponds to the following list:

- A. Arcelio Aponte, President  
State Board of Education
- B. Kathy A. Goldenberg, Vice President  
State Board of Education
- C. Dr. Ronald Butcher, Member  
State Board of Education
- D. Dr. Nedd James Johnson, Member  
State Board of Education
- E. Dr. Ernest Lepore, Member  
State Board of Examiner
- F. Andrew J. Mulvihill, Member  
State Board of Education
- G. Dr. Joseph Ricca, Member  
State Board of Education
- H. Nora Faverzani, Student Representative  
State Board of Education
- 1. Stan Karp, Director of Secondary Reform  
Education Law Center
- 2. James Harris, President

- New Jersey Association of Black Educators
3. Christine Miles, Associate Director of Professional Development  
New Jersey Education Association
  4. Donna Custard, President  
New Jersey Chamber of Commerce Foundation
  5. Sara Joslin, Environmental Action Chair  
Church Women United in New Jersey
  6. Sean Spiller, Vice President  
New Jersey Education Association (NJEA)
  7. Cristina Cucci, President-Elect  
New Jersey Association of School Librarians
  8. Mary O'Malley, Coalition Member  
We Raise New Jersey
  9. Cathy Lindenbaum, Board Member  
New Jersey PTA
  10. Julie Borst, Advocate  
Save our Schools NJ
  11. Anna Polozzo, Parent
  12. Colette Staab, Parent
  13. Elizabeth Mullholland, Parent
  14. Sarah Blaine, Parent
  15. Susan Cauldwell, Citizen
  16. Eric Milou, Professor of Mathematics  
Rowan University
  17. Shelley Skinner, Executive Director  
Better Education for Kids
  18. Patricia Wright, Executive Director  
New Jersey Principals and Supervisors Association
  19. Karen Bingert, Principal  
Hillsborough School District
  20. Pat Massey, Board Member  
New Jersey Association of School Librarians
  21. Judy Savage

New Jersey Council of County Vocational-Technical Schools

22. Michael A. Vrancik, Director of Government Relations  
New Jersey School Boards Association
23. Rose Acerra, President  
New Jersey PTA
24. Michael Taylor, Education Committee Chair  
African American Chamber of Commerce of New Jersey
25. Patricia Morgan, Executive Director  
JerseyCAN
26. Adrienne Agnoli
27. Aggie Hawley
28. Aileen Larrison
29. Aimee Michalski
30. Aitza Garcia
31. Al Beaver
32. Alaina Chip
33. Alexandra Helmis
34. Alexandra Marrero
35. Alexandra Wisnowski
36. Alexis De Coma
37. Alexis Holbrook
38. Alfreda Clancy
39. Ali Collins
40. Alice David
41. Alice Roberts
42. Allen Kolchinsky
43. Allison Deloche
44. Allison Gomez

45. Allison Rappaport
46. Allyson Zariczny
47. Aly Pospisil
48. Amanda Boulton
49. Amanda Gallagher
50. Amanda Kochinski
51. Amanda Locicero
52. Amanda Salvitty
53. Amani Abedrabbo
54. Amberley Roio
55. Amie Vanantwerp
56. Amy Forte
57. Amy Gallagher
58. Amy Gazaleh
59. Amy Harrington
60. Amy Scott
61. Amy Semeniuk
62. Amy Sussman
63. Amy Willis
64. Amy Willuski
65. Ana Fuentes
66. Andrea Cohen
67. Andrea Pastore
68. Andrea Streitfeld
69. Andy Beutel
70. Angela Cordova

71. Angela Garofalo
72. Angela Villeda
73. Anita Ferrante
74. Ann Arella
75. Ann Cottone
76. Ann Francis
77. Ann Kaspereen
78. Ann Marie Griesling
79. Ann Minski
80. Ann Molinari
81. Ann Monahan
82. Ann Underwood
83. Anna Schlesier
84. Anne Ecke
85. Anne Poole
86. Anne Sternfeld
87. Annemarie Liloia
88. Annette Creedon
89. Annette Ruch
90. Anonymous
91. Anthony Bergamino
92. Anthony Medio
93. Antonia Benecchi
94. Antonio Debellonia
95. Antonio Mancini
96. April Lindley

97. Arden Niessner
98. Arlene Stella
99. Arminee Curran
100. Ashanti Rankin
101. Ashleigh Raubertas
102. Ashley Bresee
103. Ashley Butterick
104. Asia So
105. Asra Mazhar-Uddin
106. Audrey Davey
107. Ava Annese
108. Barbara Gary
109. Barbara Gizo
110. Barbara Jenner
111. Barbara Lutsky
112. Barbara Monschauer
113. Barbara Nichols
114. Barbara Retzko
115. Barbara Sacchetti
116. Barbara Sharer
117. Barbara Waldron
118. Barbette Lovas
119. Beata Schuckle
120. Beth Borrus
121. Beth Dreifach
122. Beth Katz

123. Betsey Rescorla
124. Betty Costa
125. Bill Cole
126. Bill Glick
127. Bob Blistan
128. Bonnie Berenger
129. Brandon Cresci
130. Brenda Dinuzzo
131. Brenda Hofler-Battle
132. Brenda McNeil
133. Breneda Henry
134. Brian Adams
135. Brian Cary
136. Brian Flanagan
137. Brian Mclaughlin
138. Brian O'Halloran
139. Brian Scirocco
140. Brianna Thomas
141. Bridget Lamperti
142. Bridget Lander
143. Bridget Masters-Littleton
144. Brienne Valvano
145. Brittany Fieldson
146. Brittany Warther
147. Bronwen Eastwood
148. Bronwyn Springer

149. Brook Zelcer
150. Brooke Baldizzone
151. Bruce Lindstedt
152. Brynn Pearsall
153. Candace Bruyning
154. Candice Zachowski
155. Cara Leach
156. Cara Petsch
157. Carene Petrie
158. Carmen Collins
159. Carmen Delgado
160. Carmen Melendez
161. Carmine Capogrosso
162. Carol Brinks
163. Carol Ceglia
164. Carol Friedrich
165. Carol McGlynn
166. Carol Otis
167. Carol Otvos
168. Carol Ramey
169. Carol Ruchman
170. Carole McMorrow
171. Carolyn Burdy
172. Carolyn Hobbs
173. Carolyn Muglia
174. Carolyn Petillo

175. Carrie Odgers Lax
176. Casey Heitman
177. Cassandra Montague
178. Catherine Dimiceli
179. Catherine Herdman
180. Catherine MacManiman
181. Catherine Schofield
182. Cathy Easley
183. Celeste D'Alonzo
184. Charles Joseph
185. Charles Moran
186. Charles Spatzier
187. Charlie Best
188. Charlie Ernst
189. Cheri Ator
190. Cherie O. Tittermary
191. Cheryl Berman
192. Cheryl Carley
193. Cheryl Hernandez
194. Cheryl Neiberline
195. Cheryl Tunstall
196. Cherylan Shea
197. Chris Carpenter
198. Chris Collins
199. Chris Hurley
200. Chris Puder

201. Christina Bavaro
202. Christina Dare
203. Christina Johnson
204. Christina Quattrone
205. Christina Russo
206. Christina Tenore
207. Christina Visakay
208. Christine Apple
209. Christine Buchanan
210. Christine Caton
211. Christine Cordeira
212. Christine Decesare
213. Christine Hartman
214. Christine Lodge
215. Christine Masters
216. Christine Miles
217. Christine Onorato
218. Christine Sack
219. Christopher Bowman
220. Christopher Cannella
221. Christopher Frasco
222. Christopher Metzger
223. Christopher Sterba
224. Christy Marrella
225. Claire Sakata
226. Clarissa Barresi

227. Claudia Costello
228. Colette Staab
229. Colleen Atchison
230. Colleen El-Sawaf
231. Colleen Ferguson
232. Colleen Girgenti
233. Colleen Kennedy
234. Colleen Kurowsky
235. Connie Lejda
236. Corinna Kociuba
237. Cortney Sirianni
238. Cullen Winfield
239. Cynthia Allen
240. Cynthia Gallagher
241. Cynthia Jefferson
242. Cynthia Meier Lota
243. Cynthia Page
244. Cynthia Rutty
245. D.J. Rukin
246. Daira Farrell
247. Daisy Ponting
248. Dale Schneider
249. Dali Kilpatrick
250. Dan Cooney
251. Dan Staples
252. Dana Dilorenzo

253. Dana Havens
254. Dana Young
255. Daniel Epstein
256. Daniel Foerg-Spittel
257. Daniel Maldonado
258. Daniel Miller
259. Danielle Muratschew
260. Danielle Reynolds
261. Danielle Williams
262. Danielle Zillitto
263. Darlene Laubenstein
264. Darren Vaniskhian
265. Daryn Plummer
266. Dave Redfield
267. David Givler
268. David Kardos
269. David Parker
270. David Westawski
271. Dawn Caporusso
272. Dawn Lucad
273. Dawn Pizzo
274. Dawn Ward
275. Dawn Williams
276. Dayna Orlak
277. Deanna Reynolds
278. Deanna Whitley

279. Deb Caulfield
280. Debbie Baer
281. Debbie Dornan
282. Deborah Burns
283. Deborah Falaise
284. Deborah Gonzalez
285. Deborah Horn
286. Deborah Lamer
287. Debra Bunn
288. Debra Carman
289. Debra Hackett
290. Debra Struble
291. Demetria Lane
292. Denise Frullo
293. Denise Kane
294. Denise King
295. Denise Ragozzino
296. Denise Schlachter
297. Dennis Carroll
298. Deschela Davis
299. Desiree Brennan
300. Diana Calvanico
301. Diana Diehl
302. Diana May
303. Diane Clayton
304. Diane Kaplan

305. Diane Mchugh
306. Diane Otoole
307. Diane Picchierri
308. Diane Specht
309. Diane Tighe
310. Diane Vistein
311. Diane Voltolina
312. Dianna Morris
313. Dianne Tomasso
314. Dina Augustine
315. Dominic Russomagno
316. Dominick Maak
317. Don Yerks
318. Donald Hard
319. Donald MacCarrick
320. Donna Headley
321. Donna Langel
322. Donna Lombardo
323. Donna Macaluso
324. Donna Middlebrooks
325. Donna Reaver
326. Donna Sabol
327. Donna Simon
328. Donna Zirkel
329. Doreen McDevitt
330. Drew Hedges

331. Ebony Rivera
332. Eda Ferrante
333. Edward Pierson, Iv
334. Edwinta Rhue
335. Eileen Barr
336. Eileen Mchugh
337. Elaine Thurmond
338. Elaine White
339. Eleanor Vick
340. Elisa Schwartz
341. Elissa Graga
342. Elizabeth Alcamo
343. Elizabeth Colucci
344. Elizabeth Harwood
345. Elizabeth Kovach
346. Elizabeth Pita
347. Elizabeth Przywara
348. Elizabeth Zeppilli
349. Ellen Francess
350. Ellen Mutz
351. Ellen Ogintz
352. Ellen Tosi
353. Emely Garcia
354. Emily Whitehead
355. Emma Evans
356. Erica Iezzi

357. Erica Martinucci
358. Erica Pekar
359. Erika Barone
360. Erin Chiappini
361. Erin Poller
362. Erin Shevach
363. Erin Sikora
364. Ernest Fisher
365. Ernest Valdes
366. Esmeralda Garcia
367. Ethan Betten
368. Ethan Fay
369. Eugenia Cooley
370. Evan Brosniak
371. Evelyn Blanchard
372. Evelyn Estrella
373. Felicia Struffolino
374. Frank Mazzone
375. Franklin Butterick
376. Gail Hascha
377. Gail Kida-Rosso
378. Gail Van Dyken
379. Gema Cuffari
380. George Georgoulas
381. George Gundrum
382. George Joseph

383. Gert Yoselevich
384. Gianna Scaglione
385. Gigi Hepperle
386. Gillian Lewkowicz
387. Gina Giorgianni
388. Gina Hurley
389. Gina Roman
390. Gina Scherzo
391. Gina Wirth
392. Gladys Sinclair
393. Gloria Ansaldi
394. Grace Lepore
395. Grace Macdonald
396. Grace Rarich
397. Greg Bing
398. Greg Dewolf
399. Gregg Biesiada
400. Gretchen Cianciarulo
401. Gwendolyn Ndubuisi
402. Heather Altamura
403. Heather Bubnowski
404. Heather Glovich
405. Heather Kavanagh
406. Heather Killeen
407. Heather Ledder
408. Heather McCreight

409. Heather Pearson
410. Heather Rolandelli
411. Heather Schubauer
412. Heidi Brache
413. Heidi Kramer
414. Heidi Marie Huff
415. Helen Kleinberg
416. Helene Sonnema
417. Henry Goodhue
418. Hila Gal
419. Hilary Caruso
420. Hilary Causo
421. Holly Johnson
422. Holly Macdonald
423. Howard Kidorf
424. Irena Amato
425. Irene Matos
426. Irene Wojcik
427. Iris Gutin
428. Ivona Saniewska
429. Iwona Diaz
430. J. Rowe
431. Jack Sujovolsky
432. Jacki Mullarkey
433. Jackie Ramirez
434. Jaelyn Jones

435. Jaclyn Kelly
436. Jacob Weber
437. Jacqueline Grosser
438. Jacqueline Murtha
439. Jacqueline Rodimer
440. Jacqueline Turk
441. Jaime Todaro
442. James Dennis
443. James Kirby
444. James Lubrani
445. James Puliatte
446. Jamie Blumas
447. Jamie Hudak
448. Jamie Kleiner
449. Jamie Rapczynski
450. Jamie Vermaat
451. Jan Dagenais
452. Jane Crane
453. Jane Esdaile
454. Jane Sestilio
455. Janet Kopchinski
456. Janice Boski
457. Janice Cooper
458. Janice Liddy
459. Janice Wilson
460. Jaqueline Mendoza

461. Jason Collinsworth
462. Jason Velante
463. Jean Labriola
464. Jeanine Colon
465. Jeanine Golderer
466. Jeanne Osborn
467. Jeannette McClusky
468. Jeff Krapels
469. Jeff Train
470. Jeffrey Grose
471. Jeffrey Lai
472. Jeffrey Turner
473. Jen Cody
474. Jena Falkowski
475. Jenine Peters
476. Jenn Babilino
477. Jenna Bailin
478. Jenna Howansky
479. Jenna Ings
480. Jennifer Ansbach
481. Jennifer Anzaldi
482. Jennifer Ciocco
483. Jennifer Clemen
484. Jennifer Day
485. Jennifer Eccles
486. Jennifer Geisheimer

487. Jennifer Gilbert
488. Jennifer Goudreau
489. Jennifer Gregory
490. Jennifer Johnson
491. Jennifer Lane
492. Jennifer McCarron
493. Jennifer Nagy
494. Jennifer Nienstadt
495. Jennifer Palome
496. Jennifer Pape
497. Jennifer Rodriguez
498. Jennifer Russo
499. Jennifer Stever
500. Jennifer Trattler
501. Jennifer Verme
502. Jennifer Viverito
503. Jennifer Volz
504. Jennine Peduto
505. Jenny Chen
506. Jeri Hendrickson
507. Jess Soell
508. Jessica Clayton
509. Jessica Demkiw
510. Jessica Denney
511. Jessica Gonzalez
512. Jessica Grzeskowiak

513. Jessica Mannion
514. Jessica Oheir
515. Jessica Rivas
516. Jessica Schutte
517. Jessica Spunberg
518. Jessica Storch
519. Jesus Garcia
520. Jill Crow
521. Jill Kramer
522. Jillian Ferdinand
523. Joan Bredin
524. Joan Noonan
525. Joan Prach
526. Joan Walsh
527. Joan Wright
528. Joann Evanowski
529. Joann Houck
530. Joanne Bruno
531. Joanne Chack
532. Joanne Greco
533. Joanne Hornberger
534. Jo-Anne Montanti
535. Joanne Tagliamonte
536. Joanne Van Horn
537. Jobina Rivera
538. Joe D'Andrea

539. Joe Dobis
540. Johanna O'Brien
541. John Basile
542. John Capezza
543. John Chamberlain
544. John Cinciarelli
545. John Hrynyk
546. John Miller
547. John Terry
548. John Wodnick
549. John Zurka
550. Jon Coniglio
551. Jon Eremus
552. Jonathan Barresi
553. Jonathan Hallerman
554. Jose Figueroa
555. Joseph Dedalonis
556. Joseph Dobis
557. Joseph Fleischner
558. Joseph S. Cvikich
559. Joshua Fausty
560. Joy Patterson
561. Joyce Doenges
562. Judith Jaeger
563. Judy Black
564. Judy Walsh

565. Judy Warmingham
566. Julia Guttilla
567. Julianna Fragulis
568. Julie Carter
569. Julie D'Angelo
570. Julie Dickson
571. Julie Kelman
572. Julie Nell
573. Justin Swisher
574. Justine Giovanetti
575. K. Statile
576. Kaitlyn Boyle
577. Kaitlyn Duvernay
578. Karen Babinski
579. Karen Duffy
580. Karen Ermer
581. Karen Haber
582. Karen Jannarone
583. Karen Joseph
584. Karen Lindner
585. Karen Magee
586. Karen Phelps
587. Karen Stiles
588. Karin Lloyd
589. Karwn Homeyer
590. Katelyn James

591. Katerina Minimi
592. Katherine Chao
593. Katherine Curreri
594. Katherine Morris
595. Katherine Neary
596. Katherine Weber
597. Kathie Redmond
598. Kathleen Carey
599. Kathleen Forsell
600. Kathleen Jorgensen
601. Kathleen Macdonald
602. Kathleen Murphy
603. Kathleen Parker
604. Kathleen Quinn
605. Kathleen Valencia
606. Kathleen Williams
607. Kathleen Wood
608. Kathryn Graf
609. Kathryn Hokanson
610. Kathy Brooks
611. Kathy Cartwright
612. Kathy O'Connor
613. Kathy Paterek
614. Katie Elko
615. Katie Pendleton
616. Katie Stabile

617. Katie Ward
618. Katrina Squire
619. Keisha Ingram
620. Keith Grace
621. Keith Presty
622. Keith Warfield
623. Kelleyann Morris
624. Kelly Clark
625. Kelly Cline
626. Kelly Donovan
627. Kelly Falknor
628. Kelly Gartland
629. Kelly Nolan
630. Kelly Rodgers
631. Kelly Salerno
632. Kenneth Smith
633. Keri Giannotti
634. Keriann Eklund
635. Keriann Zadlock
636. Kerry Horleman
637. Kevin Coletti
638. Kevin Connors
639. Kevin Flood
640. Kevin Wallace
641. Kevin Wessler
642. Kim Askin

643. Kim Aubry
644. Kim Kelly
645. Kim Keyack
646. Kim Landers
647. Kim Moretz
648. Kim Moynihan
649. Kimberlee Shaw
650. Kimberly Harris
651. Kimberly Kirstein
652. Kimberly Martin
653. Kimberly Miller
654. Kimberly Paccione
655. Kimberly Redfearn
656. Kimberly Scott Hayden
657. Kirsten Heller
658. Korinne Kensicki
659. Kourtney Wunderlich
660. Kristen Butler
661. Kristen Clark
662. Kristen Domena
663. Kristen Langford
664. Kristen Snow
665. Kristen Sullivan
666. Kristen Tang
667. Kristian Kristan
668. Kristin Derevjanik

669. Kristin Orłowski
670. Kristin Schwartz
671. Kristin Williams
672. Kristina Fallon Tomaino
673. Kristina Podolski
674. Kristine Haynes
675. Kristine Laporte
676. Kristine Miller
677. Kristine Racaniello
678. Kristine Williamson
679. Kristyne Singer
680. Krystal Kubichek
681. Laila Gansert
682. Lakresha Hodge
683. Laura Barker
684. Laura Conn
685. Laura Detjen
686. Laura Edelstein
687. Laura Giumarra
688. Laura Granett
689. Laura Grippaldi
690. Laura Holman
691. Laura Joyce
692. Laura Malec
693. Laura Schwartz
694. Laura T.

695. Laura Tulloch
696. Laureen Marston
697. Lauren Aiello
698. Lauren Battiato
699. Lauren Carmano
700. Lauren Drugas
701. Lauren Lagreca
702. Lauren Murray
703. Lauren Rudowski
704. Lauren Spiller
705. Lauren Tosti
706. Laurie Gibson-Parker
707. Laurie Herbst
708. Laurie Schorno
709. Leah McDonnell
710. Leah Pintilie
711. Lee Brensinger
712. Leon Alirangues
713. Leshaun Arrington
714. Lesley Caswell
715. Leslie Larose
716. Leslie Natsis
717. Letitia Schuman
718. Liisa Perrin
719. Lillian Garcia
720. Linda Behrens

721. Linda Madden
722. Linda Mandarino
723. Linda Markow
724. Linda Marton
725. Lindsey Jachens
726. Lisa Ames
727. Lisa Black
728. Lisa Brooks
729. Lisa Campisi
730. Lisa Mangione
731. Lisa Poggi
732. Lisa Sassaman
733. Lisa Trapani
734. Lisa Urciuoli
735. Lisa Van Es
736. Lisa Veit
737. Lisa Wichtendahl
738. Liz Cruz
739. Lois Yukna
740. Lora Santucci
741. Loretta Ehrke-Beamer
742. Lori Amison
743. Lori Gianchiglia
744. Lori Lalama
745. Lori Marchetti
746. Lorne Macdonald

747. Lorraine Snyder
748. Lorrie Adler
749. Luanne Hughes
750. Lucia Dinapoli
751. Lucia Quarato
752. Lucy Hackler
753. Luis Palacio
754. Lynn Baker
755. Lynn Brenner
756. Lynn Dragovich
757. Lynn Lubrecht
758. Lynn Orozco
759. Lynne Parian
760. Lynsey Santiago
761. Maggie Rodriguez
762. Maggie Steele
763. Mallory Garvin
764. Marc Bray
765. Marc Caprio
766. Marc Lobianco
767. Marcia Howe
768. Marcy Fisher
769. Marcy Smith
770. Marcy Tomasello
771. Margaret Kube
772. Margie Shylock

773. Maria Bigonzi
774. Maria De Leon
775. Maria Duran
776. Maria Ginart
777. Maria Lo Bianco
778. Maria Maccarrone
779. Maria Valdes
780. Marianne Baker
781. Marie Taylor
782. Marie Walling
783. Mariellen Bradley
784. Marilyn Isaacs
785. Marilyn Kelly
786. Marissa Brodzicki
787. Marissa Distasio
788. Maritza Howland
789. Marjorie Cobley
790. Mark Falcon
791. Mark Grilo
792. Marleen Lewandowski
793. Martha Mackie
794. Martha Perez
795. Marthita Thomas
796. Martin Sharofsky
797. Mary Alice Rogoff
798. Mary Arrowoid

799. Mary Ellen Nicolosi
800. Mary Ellen Summers
801. Mary Jane Morton
802. Mary Jean Ryerson
803. Mary Jo Burnside
804. Mary Knell
805. Mary McCabe
806. Mary O'Shea
807. Mary Paulson
808. Mary Schmidt
809. Mary Walker
810. Mary Wood
811. Mary Zaccardi
812. Maryann Capursi
813. Maryann Zizza
814. Maryanne Evanko
815. Maryanne Illes
816. Marybeth Beichert
817. Maryellen Greer
818. Maryke Alburg
819. Matthew Flores
820. Matthew Higgins
821. Matthew Hokanson
822. Matthew Hyzer
823. Matthew Lafferty
824. Matthew McCann

825. Matthew Raden
826. Matthew Stuart
827. Maura Fox Collier
828. Maura McDermott
829. Maureen Harris
830. Maureen Rutter
831. Megan Moran
832. Meg Yar
833. Megan Jones
834. Megan Sheridan
835. Meghan Burgin
836. Meghan Dugan
837. Meghan Moyle
838. Melanie Defazio
839. Melanie Markarian
840. Melina Spitale
841. Melinda Delpizzo
842. Melisa Whitworth
843. Melissa Delucca
844. Melissa Goglia
845. Melissa Hancock
846. Melissa Hiller
847. Melissa Katz
848. Melissa Kulynych
849. Melissa Manolakakis
850. Melissa McCarron

851. Melissa Mohr
852. Melissa Murray
853. Melissa Stierle
854. Melissa Terhune
855. Melissa Tomlin
856. Melissa Tomlinson
857. Mia Doman
858. Michael Beal
859. Michael Capozzi
860. Michael Dias
861. Michael Domena
862. Michael Gawronski
863. Michael Grele
864. Michael Larosa
865. Michael Mazzuca
866. Michael Mitchell
867. Michael Wichart
868. Michele Borak
869. Michele Carmany
870. Michele Defazio
871. Michele Gierla
872. Michele Latora
873. Michele Martinelli-Wurst
874. Michele Morris
875. Michelle Ballard
876. Michelle Brangan

877. Michelle Cannaday
878. Michelle George
879. Michelle Giuliano
880. Michelle Kristiansen
881. Michelle Shanahan
882. Michelle Shepard
883. Michelle Vidovich
884. Michelle Violante
885. Mike Mugavero
886. Mike Ryan
887. Mindy Goldenberg
888. Miriam E. Medina
889. Mirvia Miller
890. Monica Herits
891. Monica Ritkes
892. Monique Dicarlo
893. Monique Sculfort
894. Mora Pattik
895. Ms. Shalhoub
896. Nancy Ahearn
897. Nancy Benson-Tarquini
898. Nancy Elliott
899. Nancy Giannetta
900. Nancy Lynch
901. Nancy Maresca
902. Nancy Miles

903. Nancy Sampogna
904. Nancy Yaeger-Craig
905. Ned Camuso
906. Neil Ortiz
907. Nellie Aponte
908. Nichole Lesniak
909. Nick Hernandez
910. Nicole Bekefi
911. Nicole Cole
912. Nicole Di Chiara
913. Nicole Iappelli
914. Nicole Ostasiewski
915. Nicole Slattery
916. Nicole Taddeo
917. Nicole Theophall
918. Nicole Ward
919. Noelle Immediato
920. Noelle Tabor
921. Noha Saleh
922. Nora Green
923. Nora Maloney
924. Norma Gonzalez
925. Paige Morgan
926. Pam Baar
927. Pamela Fadden
928. Pamela Johnson

929. Pamela Mason
930. Pamela Pizanie
931. Pamela Shepard
932. Pat Kollar
933. Pat Weber
934. Patricia Adubato
935. Patricia Allen
936. Patricia Bernstein
937. Patricia Boyce
938. Patricia Donohoe
939. Patricia Guild
940. Patricia Hosmer
941. Patricia Lugo
942. Patricia McGinn
943. Patricia Moore
944. Patricia Pillsbury
945. Patricia Schall
946. Patricia Taitt
947. Patricia Walker
948. Patricia Yapple
949. Patricia Zanone Jubelt
950. Patrick Callahan
951. Patti Gerety
952. Patty Horowitz
953. Patty Querrazzi
954. Penny Szumaski

955. Peter Blodnik
956. Peter Brill
957. Peter O'Brien
958. Peter Schuenzel
959. Peter Strandes
960. Phyllis Deangelis
961. Phyllis Sneyers
962. Rachel Berls
963. Rachel Donovan
964. Radhika Balasubramanian
965. Raelynn Micka
966. Randall Miller
967. Raymond Giordano
968. Raymond Sypniewski
969. Rebecca Bookman
970. Rebecca Korovikov
971. Rebecca Springswirth
972. Rebecca Torok
973. Rebecca Tzortzinis
974. Regina Honore
975. Regina Jagoo
976. Regina Meehan
977. Regina Plesniarski
978. Regina Tuma
979. Renee Hall
980. Renee Michaud

981. Rhonda Palatiello
982. Rhonda Sturm
983. Rich Hartsuiker
984. Rich Pentz
985. Richard Wolf
986. Rita Salemo
987. Rita Sellars
988. Robert Berger
989. Robert Harkins
990. Robert La Morte
991. Robert Lewis
992. Robert Ragati
993. Robyn Depeola
994. Robyn Ivey
995. Roger Baker
996. Rolla Herman
997. Ron Hill
998. Rosa Castillo
999. Rose Cioffi
1000. Rosina Muti
1001. Roz Busch
1002. Ruth Ann Fox
1003. Ruth Blackman
1004. Ruth Cruz
1005. Ruth Kerr
1006. Ruth Valdes

1007. Ryan Biesiada
1008. Ryan Dilks
1009. Ryan O'Donnell
1010. S. Holly Eisenberg
1011. Sage Drewke
1012. Sam Lichtenfeld
1013. Samantha Dansky
1014. Samantha Dengel
1015. Samantha Draper
1016. Samantha Ross
1017. Samantha Vreeland
1018. Samantha Westberg
1019. Sandra McGreevey
1020. Sandra Russo
1021. Sandy Locke
1022. Sara Gilgore
1023. Sarah Carino
1024. Sarah Patterson
1025. Sean Banks
1026. Sean Hackbarth
1027. Sean Spiller
1028. Shahnaz Jamhour
1029. Shameem Kamra
1030. Shana Deininger
1031. Shannon Lewis
1032. Shanta Anderson

1033. Shari Mendelson
1034. Shari Tishgart
1035. Sharon Berk
1036. Sharon Edrlberg
1037. Sharon Garry
1038. Sharon Hill
1039. Sharon Lautner
1040. Sharon Paster
1041. Sharon Shephard
1042. Sharon Thomas
1043. Shawn Trautweiler
1044. Sheila Woodson
1045. Shellie Jackson
1046. Shena Thomas
1047. Sheri Biesiada
1048. Sherie Piniella
1049. Sherri Adamson
1050. Sherri Firth
1051. Sherry Rich
1052. Shirley Chamberlin
1053. Sonya Sabb
1054. Stacey Brown-Downham
1055. Stacey Melhorn
1056. Stacey Nolan
1057. Stacey Vitale
1058. Stacie Dibona

1059. Stefani Nochumson
1060. Stefania Ave Maria Abene
1061. Stefanie Cohen
1062. Stefanie Morales
1063. Stephanie Langner
1064. Stephanie Mandy
1065. Stephen Bouchard
1066. Stephen Kuwent
1067. Stephen March
1068. Stephen Presa
1069. Stephen Sarsano
1070. Steven Beatty
1071. Steve Boudalis
1072. Steve Donato
1073. Steve Hopper
1074. Steve Maietta
1075. Steve Redfearn
1076. Steven Johnson
1077. Stu Eimer
1078. Sue McBride
1079. Susan Balderstone
1080. Susan Barr
1081. Susan Beekman
1082. Susan Bryson
1083. Susan Clark
1084. Susan Dziob

1085. Susan Evans
1086. Susan Goldberg
1087. Susan J. Fitzpatrick
1088. Susan Jones
1089. Susan Kardos
1090. Susan Kearns
1091. Susan Maniglia
1092. Susan Maurer
1093. Susan Morgan
1094. Susan Needleman
1095. Susan Perez
1096. Susan Polonsky
1097. Susan Roncs
1098. Susan Salamone
1099. Susan Stirrat
1100. Susan Tamburro
1101. Susan Vigilante
1102. Susan Walsh
1103. Susanee Testani
1104. Suzanne Gugliocciello
1105. Taki Radiotis
1106. Talia Stephens
1107. Talisa Butler
1108. Tamara Beatty
1109. Tammy Taggart
1110. Tara Brunner

1111. Tara Delgandio
1112. Tara Egenton
1113. Taylor Bogan
1114. Teresa Baunworth
1115. Teri Trivigno
1116. Teri Wilcox
1117. Terri Short-Lyons
1118. Thalla-Marie Choxi
1119. Thomas Vranesich
1120. Theresa Awad
1121. Theresa Fuller
1122. Theresa Rapavi
1123. Theresa Ryan
1124. Therese Colligan
1125. Therese Guarinello
1126. Therese Hipkins
1127. Thom Drewke
1128. Thomas Cutalo
1129. Thomas Howard
1130. Thomas Jarozyński
1131. Thomas Papaleo
1132. Thomas Schram
1133. Thomas Zayac
1134. Tiffany Doltz
1135. Tim Wolfe
1136. Tina Del Duca

1137. Tom Elliott
1138. Tom Rosenberg
1139. Tony Robinson
1140. Tracey Abrams
1141. Tracey Guido-Paul
1142. Tracey Repici
1143. Traci Dodd
1144. Tracy Bustard
1145. Tracy Stefan
1146. Trent Johnson
1147. Tricia Radka
1148. Valdery Valencia
1149. Valeria Fogarino
1150. Valerie Alimonti
1151. Valerie Barbarise
1152. Valerie Carbonara
1153. Valerie Joyce
1154. Valerie Luther
1155. Veronica Kraus
1156. Veronica Lubrano
1157. Vetrica Ghee
1158. Vickie Shepherd
1159. Victoria Zizzo
1160. Vincent Eremus
1161. Vincent Mottern
1162. Vincenzo Angelucci

1163. Vivian Colon Brito
1164. Wanda Adamson
1165. Warren Fisher
1166. Waseem Malik
1167. Wendy Acropolis
1168. Wendy Buchanan
1169. Wendy Chang
1170. Wendy Clinton
1171. Wendy Korp
1172. Wendy Monaghan
1173. William Mumbower
1174. William Panfile
1175. William Smerdon
1176. Willie Allan
1177. Yvonne Edwards
1178. Zach Smith
1179. Zaire Durant-Young
1180. Zoila Correa
1181. Abbie Fyke
1182. Ada Gong
1183. Aditi Tandon
1184. Adria Christopher
1185. Adrienne Shanfield
1186. Adrienne Sorensen
1187. Afsheen Shamsi
1188. A.J. Dipaolo

1189. Albert Pierce
1190. Aldamarie Ciavola
1191. Alec Shantzis
1192. Alex Jurgelevicius
1193. Alex Rubens
1194. Alexa Harrington
1195. Alexander Pedicini
1196. Alexandra Drazniowsky Curtis
1197. Alicia Berry
1198. Alicia Delia
1199. Alicia Molnar
1200. Alicia Reynolds
1201. Alioune Seck
1202. Alisa Ryan
1203. Alisha Malone
1204. Alison Paoello
1205. Alison Pflieger
1206. Alix Marsters
1207. Allan Weissman
1208. Allexandra Barcohen
1209. Allison Hawkins
1210. Allison Weaver
1211. Ally Hill
1212. Allyson Estes
1213. Alma Edly
1214. Alma Morel

1215. Altschuler Lauren
1216. Alvin Evans
1217. Alyson Whelan
1218. Alyssa Radomski
1219. Alyssa Yang
1220. Amal Saad
1221. Amanda Hamlin
1222. Amanda Lieber
1223. Amanda Rogerson
1224. Amanda Vlach
1225. Amber Schena
1226. Amiri Mayo
1227. Amy Ackermanruch
1228. Amy and Michael Tan
1229. Amy Flax
1230. Amy Flores
1231. Amy Fuentes
1232. Amy Galarowicz
1233. Amy Gold
1234. Amy Kline
1235. Amy Miller
1236. Amy Nazarko
1237. Amy Rabb-Liu
1238. Amy Thompson
1239. Amy Widman
1240. Ana Acosta

1241. Ana Couto
1242. Ana Louie
1243. Anastasia Mann
1244. Andrea Cochran
1245. Andrea D'elia
1246. Andrea Garber
1247. Andrea Peck
1248. Andrea Puskin
1249. Andrea Semanovich
1250. Andrea Viggiano
1251. Andrew Barnett
1252. Andrew Horowitz
1253. Andrew Pfaff
1254. Andrew Risoli
1255. Andrew Rottino
1256. Andrew Valencia
1257. Angela Timm
1258. Angela Ventrone
1259. Angelo Marocco
1260. Anita Delia
1261. Anita Mancini
1262. Anja Norman
1263. Ann Conley
1264. Ann Giletta
1265. Ann Marie Lenau
1266. Ann Moyle

1267. Ann Sirico
1268. Ann Whooley
1269. Anna Bwans
1270. Anna Pietrocola
1271. Anna Polozzo
1272. Anna Warburton
1273. Annabelle Chan
1274. Anne Bodman
1275. Anne Connell
1276. Anne Dwyer
1277. Anne Macaluso
1278. Anne Pagnoni
1279. Anne Piascik
1280. Annemarie Reilly
1281. Annette Wurst
1282. Anthony Cusmano
1283. Anthony Hadzimichalis
1284. Anthony Tam
1285. Antoinette Rosario
1286. April Campbell
1287. April Merl
1288. April O'Brien
1289. April Sheffield
1290. April Villone
1291. Ardith Collins
1292. Arielle Slaff

1293. Arlen Kimmelman
1294. Arlene Lederle
1295. Arlene Levitt
1296. Armand Fabiano
1297. Arpana Dave
1298. Arunthathi Theivakumaran
1299. Asela Mourao
1300. Ashley Fonte
1301. Ashley Pagelow
1302. Audrey Grier
1303. Aura Salazar
1304. Avram Rips
1305. Barbara Cassin
1306. Barbara Cooper
1307. Barbara Horcher
1308. Barbara Mastroddi
1309. Barbara Newman
1310. Barbara Ring
1311. Barbara Shapiro
1312. Barbara Snyder Rigney
1313. Barbara Tedesco
1314. Barbara Ung
1315. Barbara Weill Greenberg
1316. Barbara Weissman
1317. Bashir Akinyele
1318. Beata M. Wilk

1319. Belinda Edmondson
1320. Bernadette Russell
1321. Bernard Gross
1322. Bernetta Washington
1323. Beth Ann Metro
1324. Beth Barrett
1325. Beth Bright
1326. Beth Egan
1327. Beth Glennon
1328. Beth Jackson
1329. Beth O'Donnell-Fischer
1330. Beth Riordan
1331. Bethany Grimm
1332. Betsy Combs
1333. Betsy Riddiford
1334. Beverly Clancy
1335. Beverly Zelcer
1336. Bill Ford
1337. Bonnie Pukash
1338. Brad Koenig
1339. Branden Rippey
1340. Brandi Dittus
1341. Brandi Gustafson
1342. Brandi Jackus
1343. Brenda Sheehan
1344. Brenda Smothers

1345. Brian Jones
1346. Brian McFadden-DiNicola
1347. Brian Sferra
1348. Brian Simone
1349. Brian Tumpowsky
1350. Bridget Arnold
1351. Bridget Kattell
1352. Brook Zelcer
1353. Bruce Revesz
1354. Bruce Salmestrelli
1355. Bruno Navarro
1356. Bryan H. Jenner
1357. Bryan Hoffman
1358. Bryan Nelson
1359. Bydette Dostie
1360. C. Bolden
1361. C. Young
1362. Caitlin Gold
1363. Camille Ragin
1364. Camille Widdows
1365. Caralyn Krail
1366. Caren Blayne
1367. Caren Spatzier
1368. Carey Speziali
1369. Cari Cooper
1370. Cari Laughman

1371. Carin MacCarrick
1372. Carl Blanchard
1373. Carl Dean
1374. Carl Lorentzen
1375. Carla Cousins
1376. Carla King
1377. Carla McMenamy
1378. Carlene Palia
1379. Carly Cohen-Bradshaw
1380. Carmela Hoefling
1381. Carmella Fusco
1382. Carol Budsock
1383. Carol Edelstein
1384. Carol Gay
1385. Carol Joyce
1386. Carol Novick
1387. Carol Reed
1388. Carol Tagoe
1389. Carola Kessler
1390. Carola Susanne Syben-Moscicki
1391. Carole Freas
1392. Carole Negron
1393. Carolrae Surovick
1394. Carolyn Henderson
1395. Carolyn Loll
1396. Carolyn Peucker

1397. Carrie Pokallus
1398. Catherine Bennett
1399. Catherine Cheo-Isaacs
1400. Catherine Cline
1401. Catherine Flynn
1402. Catherine Gelchinsky
1403. Catherine Latshaw
1404. Catherine Lugg
1405. Catherine Mascis
1406. Catherine McGeehan
1407. Catherine O'Brien
1408. Catherine Payne-Lewis
1409. Catherine Reeves
1410. Cathleen Rafalko
1411. Cathleen Saxon Jenkins
1412. Cathryn Gaul
1413. Cathy Ingraham
1414. Celena Bell
1415. Celina Matos
1416. Celsa Mangiola
1417. Chad Postman
1418. Chantal Hagan
1419. Charlene Jennings
1420. Charles Craig
1421. Charles Hagon
1422. Charles Phillips

1423. Charlotte Heenan
1424. Chelsea Capstraw
1425. Cherie Burns
1426. Cherly Santore
1427. Cheryl Calabrese
1428. Cheryl Dill
1429. Cheryl Link
1430. Cheryl Micciche
1431. Cheryl Porter-Avino
1432. Cheryl Schechter
1433. Christine Locklear
1434. Chris Bruno
1435. Chris Ferrier
1436. Chris Gordon Owen
1437. Chris Kane
1438. Chris McGovern
1439. Chris Pedicone
1440. Chrissy Sefack-Morrissey
1441. Christa Shinnars
1442. Christina Altamura
1443. Christina Basile
1444. Christina Desimone
1445. Christina Ladik
1446. Christina Moreira
1447. Christina Scala
1448. Christina Scannelli

1449. Christina Zacj
1450. Christine Banks Calderon
1451. Christine Carfagno
1452. Christine Carlson
1453. Christine Cuba
1454. Christine Dugan
1455. Christine Healey
1456. Christine Kopliner
1457. Christine Kosar
1458. Christine Lee
1459. Christine Maloney-Nolan
1460. Christine Matsoukatidis
1461. Christine McGoey
1462. Christine Mooney
1463. Christine Wichser
1464. Christopher Bennett
1465. Christopher Boutross
1466. Christopher Carpenter
1467. Christopher Szalma
1468. Christopher Tienken
1469. Chrystal Schivell
1470. Cindy Salant
1471. Cindy Smith
1472. Cindy Vittitow
1473. Claire Brown
1474. Clarisse Nicol

1475. Colette Morris
1476. Colleen Cassidy
1477. Colleen Epple Pine
1478. Colleen Fulmer
1479. Colleen Martinez
1480. Colleen Reilly
1481. Concetta Obrien
1482. Connie Ross
1483. Cordelia Bergamo
1484. Cory Banta
1485. Cory Condron
1486. Courtney Karam
1487. Craig McDaniel
1488. Crescent Maaz-Silberman
1489. Cressida Spaldi
1490. Cristian Baldwin
1491. Cristina DeMatteo
1492. Crystal Hayes
1493. Crystal Warren
1494. Cyane McCorkle
1495. Cynthia Allen
1496. Cynthia Anderson
1497. Cynthia Baldino
1498. Cynthia Jackson-Redd
1499. Cynthia McDaniel
1500. Cynthia Utter

1501. Cynthia Wade
1502. Dale Hawrylczak
1503. Dalila Da Torre
1504. Dallas Dixon
1505. Dan Ferat
1506. Dan Masi
1507. Dan Verrico
1508. Dana Frie
1509. Dana Hamilton
1510. Dana Sklar
1511. Danielle Bachovchin
1512. Danielle Bloom
1513. Danielle Casillo
1514. Danielle Davenport
1515. Danielle Degeorgio
1516. Danielle Demooy
1517. Danielle Desaro
1518. Danielle Graime
1519. Danielle Greco
1520. Danielle Laube
1521. Danielle Mastrogiovanni
1522. Danielle Mezzacca
1523. Danielle Michael
1524. Danielle Mirzwa
1525. Danna Seltzer
1526. Dannine Albanese

1527. Darla Ferdinand
1528. Daryl Perkins
1529. Daryn Martin
1530. Dave Astor
1531. Dave D.
1532. Dave Daub
1533. Dave Slaman
1534. David Bower
1535. David Cardillo
1536. David Copperman
1537. David Estoye
1538. David Fazzini
1539. David Greenbaum
1540. David Lerner
1541. Dawn Delorenzo
1542. Dawn Duff Dandino
1543. Dawn Garrabrant
1544. Dawn Golding
1545. Dawn Henderson
1546. Dawn Mackey
1547. Dawn Richardson
1548. Dawn Strand
1549. Dawn Stricoff
1550. Dawn Tapp
1551. Dawn Yonadi
1552. Dawnylle Cerula

1553. Dayna Bandman
1554. Dayna Stein
1555. Dean D. Anthonson
1556. Deanna Degraff
1557. Deanna Hernandez
1558. Deanne Carr
1559. Deb Caulfield
1560. Deb Suta
1561. Debbie Baer
1562. Debbie Foster
1563. Debbie Gries
1564. Deborah Carroll
1565. Deborah Ellis
1566. Deborah Hall-App
1567. Deborah Morales
1568. Deborah Schmeling
1569. Deborah Swan-Halpin
1570. Deborah Zdepski
1571. Debra Allshouse
1572. Debra Bristol
1573. Debra Heckmann
1574. Debra Maibach
1575. Debra Sherman
1576. Debra Wilkins
1577. Deeannah Ghazarian
1578. Deepesh R. Jiwani

1579. Delois Dameron
1580. Dena Mazur
1581. Denise Bailey
1582. Denise Deangelis
1583. Denise DeLoca
1584. Denise Frullo
1585. Denise Gamble
1586. Denise Maclean
1587. Denise Mercado Bonin
1588. Denise Sountis
1589. Dennis Simon
1590. Diana Da Silva
1591. Diana Mehnert
1592. Diana Morris
1593. Diana Seifritz
1594. Diana Slisky
1595. Diane Dunleavy
1596. Diane Hartman
1597. Diane Hungridge
1598. Diane Reyna
1599. Diane Swaim
1600. Diane Turturro-Ruiz
1601. Dianna Peller
1602. Dina Belloff
1603. Dina Derosa
1604. Dina Scacchetti

1605. Ditra Gerstle
1606. Divya Sharma
1607. Dona McNaughton
1608. Donna Agostino
1609. Donna Carlen
1610. Donna Carpenter
1611. Donna Hendrickson
1612. Donna Lombardo
1613. Donna M. Chiera
1614. Donna Nickerson
1615. Donna Poye
1616. Donna Racik
1617. Donna Sartanowicz
1618. Donna Serbe-Davis
1619. Donna Steiner
1620. Donna Szemcsak
1621. Dora Szep
1622. Doreen Albano
1623. Doreen Defeo-Gilroy
1624. Doreen Getty
1625. Doreen Randolph
1626. Doriann Sanchez
1627. Doris Cordero
1628. Dorothy Gribbin
1629. Dorothy Jensen
1630. Douglas Carracci

1631. Douglas Cohen
1632. Douglas Larkin
1633. Dr. Ellen Miller
1634. Dr. Hafiz M. Saleem
1635. Dr. Heather Van Uxem Lewis
1636. Dr. Joanne Baron
1637. Dr. Valarie Lee
1638. Dr. Valerie Pierce
1639. Drew Kellerman
1640. Duane Trowbridge
1641. E. Rooney-Kuhn
1642. Eddie Fernandez
1643. Eddie Mae Hagans
1644. Edna Friman
1645. Edward Mager
1646. Edward W. Keller
1647. Edythe Decker
1648. Eileen Little
1649. Eileen Michie
1650. Eileen Murray
1651. Eileen Reinhardt
1652. Elaine Barlow
1653. Elaine Graham
1654. Elaine Martorelli
1655. Elaine McCarthy
1656. Elana Halberstadt

1657. Eleanor Direnzowyckoff
1658. Eleanor Wang
1659. Elena Sotoraspa
1660. Elena Svitavsky
1661. Eley Family
1662. Elissa Dembner
1663. Elissa Malespina
1664. Elizabeth Baldt
1665. Elizabeth C. Demarco
1666. Elizabeth Descoteau
1667. Elizabeth Franks
1668. Elizabeth Garis
1669. Elizabeth Jacobus
1670. Elizabeth Jardines
1671. Elizabeth Kurzawa-Hawrylczak
1672. Elizabeth McNamara
1673. Elizabeth Osborne
1674. Elizabeth Parnagian
1675. Elizabeth Repsher
1676. Elizabeth Ricciardelli
1677. Elizabeth Tiernan
1678. Ellen Anello
1679. Ellen Goldberg
1680. Ellen Kealey
1681. Ellen Klimkiewicz
1682. Ellen Leibowitz

1683. Ellen Parmentier
1684. Ellen Rebarber
1685. Ellen Salmons
1686. Ellen Whitt
1687. Emily Eisen
1688. Emily Vandenakker
1689. Emily Zahajkewycz
1690. Enrica Gillikin
1691. Eric Milou
1692. Erica Doyle
1693. Erica Holan Lucci
1694. Erik Taylor
1695. Erika Conti
1696. Erin Chung
1697. Erin Collins
1698. Erin Dougherty
1699. Erin Salerno
1700. Essence Maradiaga
1701. Ethel Minchello
1702. Eunice Aridi
1703. Eva Baker
1704. Eva Deffenbaugh
1705. Evan Brosniak
1706. Fabienne Crimi
1707. Fiona Caithness
1708. Fiona Grant

1709. Fiona Stephens
1710. Flora Davis
1711. Florence Mccarthy
1712. Fr Robert Pearson
1713. Fran Burke
1714. Fran Schroeder
1715. Frances Cafferty
1716. Frances Mammarella
1717. Francine Moccio
1718. Francisco Santiago
1719. Frank Flaherty
1720. Frank Juliano
1721. Frank Romano
1722. Frank Weckerly
1723. Fred Daniels
1724. Gabrielle Altstadter
1725. Gail Engle
1726. Gail Milbourne-Nolton
1727. Gail Osborne
1728. Gail Rutigliano
1729. Gail Saks
1730. Gailene S.
1731. Gayle Casas
1732. Genevieve Grossman
1733. George Economou
1734. George Glock

1735. George Sant
1736. Georgeann Figueroa
1737. Gideon Johnson
1738. Gilbert Ambeu
1739. Gina Altamura
1740. Ginger McCarty
1741. Gisela Migueis
1742. Giselle
1743. Glenn Parisi
1744. Gloria Marandola
1745. Gloria Pinkney
1746. Glyndora King
1747. Grace O'Hanlon
1748. Gregg Williams
1749. Gregory Stankiewicz
1750. Gretchen Fancher
1751. Gretchen Heagney
1752. Gurpreet Kaur
1753. Gwen Cillo-Smith
1754. H. Tedesco
1755. Hana Prashker
1756. Hank Fandel
1757. Hannah Levin
1758. Hannah Liu
1759. Harriet Beckerman
1760. Harriette Washington-Williams

1761. Heather Barber
1762. Heather Hamman
1763. Heather McMahill
1764. Heather Palmeri
1765. Heather Puglisi
1766. Heather Robinson
1767. Heather Sorge
1768. Heather Stott-Mason
1769. Heather Sullivan
1770. Heather Whitcraft
1771. Heidi Bagonis
1772. Heidi Berkey
1773. Heidi Caruso
1774. Heidi Leigh
1775. Helen Cocuzza
1776. Hilary Padget
1777. Hillary Depiano
1778. Holly Howell
1779. Holly Lattime
1780. Holly Tedesco
1781. Hope Perry
1782. Howard Frisch
1783. Howard Margolis
1784. Hudson Pollock
1785. Ida Zizza
1786. Ilana Kriegsman

1787. Ilisa Ferrara
1788. India Mariconda
1789. Iqbal Babar
1790. Ira Shor
1791. Irene Gilman
1792. Irene Hughes
1793. Irene S Salcito
1794. Iris Quinones-Ramos, Ed.S.
1795. Iris Weingarten
1796. Irvell Cowan
1797. Isabel Bruno
1798. Isabel Fernandes
1799. Isabel Ortega
1800. Isabel Villano
1801. Isabell Buono
1802. Isabella Coennna
1803. Issa Salameh
1804. Ivey Avery
1805. Ivone Braco
1806. Izabela Trachtenbroit
1807. J. Apell
1808. J. Friedman
1809. Jackie Barber
1810. Jackie Levinson
1811. Jacqueline Manos
1812. Jacqueline Sornstein

1813. Jacqueline Tomczyk
1814. Jain Miller
1815. James A. Castiglione, Ph.D.
1816. James Avino
1817. James Colaizzi
1818. James Monaco
1819. James Smith
1820. James Stapleton
1821. Jamie Sheerin
1822. Jane Alexander
1823. Jane Ann Carluccio
1824. Jane Flanagan
1825. Jane Perry
1826. Janelle Ivry
1827. Janet Petrillo
1828. Janet Blake
1829. Janet Bodner
1830. Janet Cook
1831. Janet Crane
1832. Janet Kirsten
1833. Janet Mitchell
1834. Janet Vanderlinden
1835. Janice Andino
1836. Janice Cooper
1837. Janice L. Tufaro
1838. Janice Mehalick

1839. Janice Milstein, Ph.D.
1840. Janice Schmidt
1841. Janice Taylor
1842. Janine Lahart
1843. Jason Allen
1844. Jason Feinman
1845. Jason Wood
1846. Jay Wecht
1847. Jayne Devine
1848. Jean Durbin
1849. Jean Giacobe
1850. Jean Tirrito
1851. Jeanine Branch
1852. Jeanine Colon
1853. Jeanine Jemmott-Branch
1854. Jeanine Stapleton
1855. Jeanine Vivolo
1856. Jeannabel Reyes
1857. Jeanne Fox
1858. Jeanne Griffin
1859. Jeanne Jordan
1860. Jeanne Regan
1861. Jeanne Scardilli
1862. Jeannie Harris
1863. Jeff Daunt
1864. Jeff Leek

1865. Jeffrey Davis
1866. Jelena Aleksich
1867. Jen Kupperman
1868. Jen Mankey
1869. Jenn Cipolla
1870. Jenn Hamlet
1871. Jenn Sansone
1872. Jenna Burke
1873. Jenna Shapiro
1874. Jenna Wagman
1875. Jenni Collins
1876. Jennifer Allen
1877. Jennifer Ansbach
1878. Jennifer Applebee
1879. Jennifer Battista
1880. Jennifer Bentivegna
1881. Jennifer Bigioni
1882. Jennifer Cantara
1883. Jennifer Daunt
1884. Jennifer Fletcher
1885. Jennifer Garrido
1886. Jennifer Korn
1887. Jennifer Lascala
1888. Jennifer Lehr
1889. Jennifer M. Garcia-Griffin
1890. Jennifer McCafferty

1891. Jennifer Miller
1892. Jennifer Miller
1893. Jennifer Moshier
1894. Jennifer Nolan
1895. Jennifer Paull
1896. Jennifer Perry
1897. Jennifer Priestner
1898. Jennifer Ra, PsyD
1899. Jennifer Richards
1900. Jennifer Roussell
1901. Jennifer Rowland
1902. Jennifer Shouffler
1903. Jennifer Siverson
1904. Jennifer Sormillon
1905. Jennifer Spalding
1906. Jennifer Szczepanski
1907. Jennifer Truby
1908. Jennifer Ventola
1909. Jennifer White
1910. Jennifer Wien
1911. Jennine Rixon
1912. Jenny Goodman
1913. Jenny Messina
1914. Jeremy Bahun
1915. Jesse Teeters
1916. Jessica Allen

1917. Jessica Bivans
1918. Jessica Bush
1919. Jessica Faigle
1920. Jessica Farrell
1921. Jessica Guzman
1922. Jessica Jeitner
1923. Jessica Kolarsick
1924. Jessica Lee
1925. Jessica Lemire
1926. Jessica Long
1927. Jessica Melton
1928. Jessica Morano
1929. Jessica Nilsen
1930. Jessica Sanchez
1931. Jessica Sitzes
1932. Jessica Sterba
1933. Jessica Taube
1934. Jessica Whiteman
1935. Ji Yoo
1936. Jill Catanzaro
1937. Jill DeMaio
1938. Jill Dolan
1939. Jill Fogarty
1940. Jill Scalera
1941. Jill Stein
1942. Jill Wodnick

1943. Jillian Costantino  
1944. Jillian Koppel  
1945. Jim Lutz  
1946. Jim Price  
1947. Jim Wooldridge  
1948. Jo Taraborelli  
1949. Joan Brown  
1950. Joan Laurie  
1951. Joan Lazar  
1952. Joan Stetser  
1953. Joan Testa  
1954. Joann Abbamonte  
1955. Joann Dolan  
1956. Joann Manicone  
1957. Joanne Engo  
1958. Joanne Geanoules  
1959. Jo-Anne Klein  
1960. Joanne Lucier  
1961. Joanne M Carey  
1962. Joanne Portner  
1963. Jodi Feldman  
1964. Jodi Hoover  
1965. Jodie Zappile  
1966. Joe McAndrew  
1967. Joe Shubert  
1968. Joel Goodman

1969. Joerg Zenker  
1970. Johanna Atwood  
1971. John Abeigon  
1972. John Allen  
1973. John B. Weinstein, Ph.D.  
1974. John Beichert  
1975. John Bishop  
1976. John Carroll  
1977. John Deitelbaum  
1978. John Goldstein  
1979. John Heilner  
1980. John Motts  
1981. John Mulholland  
1982. John Nielsen  
1983. John Setteducato  
1984. John Trela  
1985. Jonathan Greenberg  
1986. Jonathan Vanderhoof  
1987. Jonette Smart  
1988. Joseph Deflorio  
1989. Josephine Marcella  
1990. Josh Eckersley  
1991. Joshua Schroeder  
1992. Josie Harmon-Harris  
1993. Joy Mazur  
1994. Joyce Bickham

1995. Joyce McCree  
1996. J.P. Patafio  
1997. Judi Lebovitch  
1998. Judi Mayo  
1999. Judi Newins  
2000. Judith Arnold  
2001. Judith Strollo  
2002. Judith Williams  
2003. Judith Zinis  
2004. Judy Musa  
2005. Judy Pietrobono  
2006. Judy Reilly  
2007. Judy Rubenstein  
2008. Julia Bollini  
2009. Julia Suarez  
2010. Julie Borst  
2011. Julie Capello  
2012. Julie Figliolia  
2013. Julie Grant  
2014. Julie K. Steinberg, Psy.D.  
2015. Julie Karavan  
2016. Julie Manganaro  
2017. Julie O'Rourke  
2018. Julie Riecks  
2019. Julie Steinberg  
2020. Julie Zimmerman

2021. Julio Borgono
2022. Jutta Gonzalez
2023. K Berecsky
2024. K Ferriero
2025. Kani Ilangovan, M.D.
2026. Kara Fowler
2027. Karen Aperawic
2028. Karen Barrow
2029. Karen Faherty
2030. Karen Flynn
2031. Karen Hornblow
2032. Karen Lindner
2033. Karen M. Indyk
2034. Karen Marmion
2035. Karen Monterosa
2036. Karen Morley
2037. Karen Nathan
2038. Karen Newman
2039. Karen Resto
2040. Karen Robinson
2041. Karen Schmidt
2042. Karen Vaughan
2043. Karen White
2044. Karen Williams
2045. Karen Winters
2046. Karin Vanoppen

2047. Karol Lashinsky
2048. Karyn Buchman
2049. Kate Moore
2050. Kate Olsen
2051. Katherine Camburn
2052. Katherine Curreri
2053. Katherine Nelson
2054. Kathleen Cullity
2055. Kathleen Grennan
2056. Kathleen Murray-McNulty
2057. Kathleen Papp
2058. Kathleen Rowe
2059. Kathleen Valencia
2060. Kathleen Zink
2061. Kathryn Flynn
2062. Kathryn Marion
2063. Kathryn Simcox
2064. Kathryn Suk
2065. Kathy Carroll
2066. Kathy Evans
2067. Kathy Guner
2068. Kathy Landadio
2069. Kathy Pendlebury
2070. Kathy Porter
2071. Kathy Ripple-Gilmour
2072. Kathy Smith

2073. Kathy Taylor
2074. Katie Collins
2075. Katie Doyle
2076. Katie Singer, Ph.D.
2077. Katy White
2078. Kay Bhasin
2079. Keenan Hill
2080. Keith DeWitt
2081. Keith Grace
2082. Kelle Frey
2083. Kelli Beard
2084. Kelly Bird
2085. Kelly Brickle
2086. Kelly Caffrey
2087. Kelly Crescenzo
2088. Kelly Cribbin
2089. Kelly Ferris
2090. Kelly Forst
2091. Kelly Goodwin
2092. Kelly Imbrenda
2093. Kelly McGraw
2094. Kelly Rosato
2095. Kelly Sawicki
2096. Kelly Wahl
2097. Kelly Ydrovo
2098. Ken Feinleib

2099. Ken Holloway
2100. Ken Hwang
2101. Ken Shulack
2102. Kenneth Cohen
2103. Kenneth Kowalski
2104. Kenneth W. Daly
2105. Kerith Lewis
2106. Kerri Anne Iapicca
2107. Kerrin Summa
2108. Kerry Heyder
2109. Kevin Kane
2110. Kim Bolton
2111. Kim Crane
2112. Kim Larosa
2113. Kim Molnar
2114. Kim Szalkai
2115. Kimberly Carroll
2116. Kimberly Estelle
2117. Kimberly Iqbal
2118. Kimberly Krauss
2119. Kimberly Lytle
2120. Kimberly Reynolds
2121. Kimberly Rowe
2122. Kimberly Tilly
2123. Kimyotta Hankins
2124. Kirk Barrett

- 2125. Kirsten Myklebust
- 2126. Kirsten Russler
- 2127. Kodi Busanic
- 2128. Kolleen Sommer
- 2129. Kris Golda
- 2130. Kris Greengrove
- 2131. Krista Caiola
- 2132. Kristen Brinkman
- 2133. Kristen Dunleavy
- 2134. Kristen Garrison
- 2135. Kristen Haar
- 2136. Kristen Miller
- 2137. Kristen Vogel
- 2138. Kristi Mattingly
- 2139. Kristiann Gudelanis
- 2140. Kristin Baker
- 2141. Kristin Borrelli
- 2142. Kristin Emslie
- 2143. Kristin Fox
- 2144. Kristin Fuccillo
- 2145. Kristin Romanok
- 2146. Kristin Shea
- 2147. Kristin Stawarz
- 2148. Kristine Demark
- 2149. Kristine Esposito
- 2150. Kristine Romano

2151. Kristine Scharaldi
2152. Kristine Shurina
2153. Kristine Suosso
2154. Kristy Rudzenski
2155. Kyle Hart
2156. Kyle Skrivanek
2157. Larissa Fanning
2158. Laura Aguirre
2159. Laura Begg
2160. Laura Brady
2161. Laura Dixon
2162. Laura D'Orio
2163. Laura Dunlap
2164. Laura E. Hill
2165. Laura Kay Roberts
2166. Laura Nese
2167. Laura Poliero
2168. Laura Rente
2169. Laura Schechter
2170. Laura Svensson
2171. Laura Van Dyke
2172. Laura Zurfluh
2173. Lauren Marston
2174. Laurel Kornfeld
2175. Lauren Carras
2176. Lauren Freedman

2177. Lauren Johnson  
2178. Lauren Maunz  
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2180. Lauren Sachs  
2181. Lauren Sullivan  
2182. Laurie Asch  
2183. Laurie Bischof  
2184. Laurie Bushey  
2185. Laurie Hemmerly  
2186. Laurie Lausi  
2187. Laurie Orosz  
2188. Laurie Pfundheller  
2189. Laurie Tarkan  
2190. Laury Stone  
2191. Lazara Valentin  
2192. Leah Robbins  
2193. Lee Renner  
2194. Leeann Cappuccio  
2195. Lee-Ann Carney  
2196. Leigh Lardiere  
2197. Leigh Moos  
2198. Lena Goodwin  
2199. Lenore Beckley  
2200. Lenore Davis  
2201. Leo Goodman  
2202. Leon Alirangues

2203. Leon Neubauer
2204. Leslie Hirsh
2205. Leslie Schraer
2206. Leslie Zacharko
2207. Lew London
2208. Lewis Stonaker
2209. Lillian Carne
2210. Lily Hawryluk
2211. Linda A. Duke
2212. Linda Abrams
2213. Linda Decaro-Salvi
2214. Linda Dionisio
2215. Linda Hockstein
2216. Linda Jacobs
2217. Linda Kelly-Gamble
2218. Linda Lance
2219. Linda Noel
2220. Linda Remolino
2221. Linda Tanaka
2222. Linda Woody
2223. Linda Zydzik
2224. Lindsay Warren
2225. Line Marshall
2226. Liora Lavon
2227. Lisa Betz
2228. Lisa Briel

2229. Lisa Brittan  
2230. Lisa Fuchs  
2231. Lisa Ginder  
2232. Lisa Glavan  
2233. Lisa Hoganson  
2234. Lisa Kelly  
2235. Lisa Kruse-Marcus  
2236. Lisa Kurzawa  
2237. Lisa Litz-Neavear  
2238. Lisa Mandelblatt  
2239. Lisa May  
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2241. Lisa Mirante  
2242. Lisa Murphy  
2243. Lisa Nichols  
2244. Lisa Powell  
2245. Lisa Pronti  
2246. Lisa Rebak  
2247. Lisa Resciniti  
2248. Lisa Rodgers  
2249. Lisa Santos  
2250. Lisa Staats  
2251. Lisa Sundel  
2252. Lisa Tafro  
2253. Lisa Trapani  
2254. Lisa Urbani

2255. Lisa Wiggins Yauch  
2256. Lisa Winter  
2257. Lisbeth Korzoun  
2258. Lisette Negron  
2259. Lisette Ramos  
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2261. Liz Donald  
2262. Liz Greene  
2263. Liz Mulholland  
2264. Lloyd Fredericks  
2265. Logan Lavail  
2266. Lois Drake  
2267. Lois Gray  
2268. Lori Benson  
2269. Lori Collins  
2270. Lori Fuchs-Meyers  
2271. Lori Grande  
2272. Lori Hadley  
2273. Lori Jorge  
2274. Lori Kennedy  
2275. Lori Satz-Clarkin  
2276. Loribel Mulero  
2277. Lorie Ruina  
2278. Lorilee Everitt  
2279. Lorraine McDonald  
2280. Louis Surovick

2281. Love Gaillard
2282. Luana Jimenez
2283. Lucy Horton
2284. Lydia Barros
2285. Lynda B. Drucker
2286. Lynette Haemmerle
2287. Lynley Jones
2288. Lynn Bridge
2289. Lynn Fedele
2290. Lynn Fryer
2291. Lynn Lepage
2292. Lynn Polin
2293. Lynn Rosenberg
2294. Lynn Szczeck
2295. Lynne Elson
2296. M. Ebert
2297. Madeleine Leach
2298. Maggy Lee
2299. Mandi Wieme
2300. Mandy Savitsky
2301. Manuela Oliveira
2302. Marc Cortese
2303. Marcella Hain Conway
2304. Marcella Simadiris
2305. Marcellus Green
2306. Marcha Rubin

2307. Marci Abramowitz
2308. Marcia Santiago
2309. Marcia Van Dyck
2310. Marcie Donnelly
2311. Marco De Pinho
2312. Marcy Benson
2313. Marcy Fisher
2314. Marcy Gadeck
2315. Maren Ernst
2316. Margaret Barnes-Williams
2317. Margaret Beissinger
2318. Margaret Charleston
2319. Margaret Diangelo
2320. Margaret Raylman
2321. Margaret Reilly
2322. Margaret Tibbitt
2323. Margaret Tomaselli
2324. Margarita Monserrat
2325. Mari Stal
2326. Maria Pardalis
2327. Maria Agapito
2328. Maria Baril
2329. Maria Bello
2330. Maria Carreno
2331. Maria Colón
2332. Maria Gandolfo

- 2333. Maria Kazanis
- 2334. Maria Loikith
- 2335. Maria Moehrke
- 2336. Maria Nina Scarpa
- 2337. Maria Parelis
- 2338. Maria Petracca
- 2339. Maria Reilly
- 2340. Maria Vazquez
- 2341. Mariann Kronyak
- 2342. Marianne Muller
- 2343. Marianne Rubino
- 2344. Marianne Strickhart
- 2345. Marie Arnold
- 2346. Marie Corfield
- 2347. Marie Filozof
- 2348. Marie Murray
- 2349. Marie Simone
- 2350. Marie Suarez
- 2351. Marie Walling
- 2352. Marilyn Carolan
- 2353. Marilyn Ortiz
- 2354. Marilyn Silva
- 2355. Marina Kurdes
- 2356. Mario J Pedro
- 2357. Marion Conway
- 2358. Marisa Januzzi

- 2359. Marisa Pasquini
- 2360. Marisol Leal
- 2361. Marissa Dietrich
- 2362. Marissa Modiano
- 2363. Marissa Radjewski
- 2364. Marjorie Breitwieser
- 2365. Mark A. DeAngelis
- 2366. Mark Andreacci
- 2367. Mark Donetz
- 2368. Mark Glickstein
- 2369. Mark Gutmann
- 2370. Mark Yacono
- 2371. Marsha Sahadi
- 2372. Marta De Pinho
- 2373. Martha Brecher
- 2374. Martha Cenicola
- 2375. Martha Kovac
- 2376. Martha Luszcz
- 2377. Martin White
- 2378. Mary Ann K. Fortunato
- 2379. Mary Botteon
- 2380. Mary Claire Lewis
- 2381. Mary Damiri
- 2382. Mary Ellen McCloy
- 2383. Mary G. Bennett
- 2384. Mary Garripoli

2385. Mary Gladden
2386. Mary Heapes
2387. Mary Hunter
2388. Mary J. Tenore
2389. Mary Juffey
2390. Mary Kate Henrich
2391. Mary Kate Pretto
2392. Mary Porcelli
2393. Mary Profico
2394. Mary Reid
2395. Mary Schmidt
2396. Mary Shaughnessy
2397. Mary Shumeyko
2398. Mary Snyder
2399. Mary Starn
2400. Mary Winkel
2401. Maryann Herrera
2402. Maryellen Moran
2403. Mathew Cherian
2404. Matthew Franck
2405. Matthew Macdonald
2406. Maura Barrett
2407. Maureen Ioannucci
2408. Maureen Kervick
2409. Mauria Zalavary-Kunkel
2410. Maya Brady

- 2411. Mayda Velez-Cruz
- 2412. Paul Salus
- 2413. Nancy Salus
- 2414. Meg Young
- 2415. Megan Finneran
- 2416. Megan Pachal
- 2417. Megan Patterson
- 2418. Megan Russell
- 2419. Megan Terrano
- 2420. Meghan Luzzi
- 2421. Mel Kalebek
- 2422. Melanie McDermott
- 2423. Melanie Vasa
- 2424. Melina Garda
- 2425. Melinda Kelley
- 2426. Melissa Abramowitz
- 2427. Melissa Barnes
- 2428. Melissa Carrelli
- 2429. Melissa Cavins
- 2430. Melissa Crain
- 2431. Melissa Deandrea
- 2432. Melissa Fitch
- 2433. Melissa Gibson
- 2434. Melissa Hodgins
- 2435. Melissa Katz
- 2436. Melissa M. Forbes

- 2437. Melissa Naud
- 2438. Melissa O'Donnell
- 2439. Melissa Reimertz
- 2440. Melissa Vazquez
- 2441. Melissa Young
- 2442. Melody Larossa
- 2443. Mercedes Davidson
- 2444. Meredith Costagliola
- 2445. Meredith Krausse
- 2446. Meredith Milazzo
- 2447. Merrell Newman
- 2448. Michael Brailove
- 2449. Michael Buchman
- 2450. Michael Houlihan
- 2451. Michael Lovino
- 2452. Michael Maillaro
- 2453. Michael McGoey
- 2454. Michael Mensahbonsu
- 2455. Michael Mignone
- 2456. Michael Struchen
- 2457. Michael Yannone
- 2458. Michele Tighe
- 2459. Michele Beneduce
- 2460. Michele Bernhard
- 2461. Michele Borak
- 2462. Michele Coppola

2463. Michele Donnelly
2464. Michele Fabbio
2465. Michele Giardino
2466. Michele Katz
2467. Michele Laikowski
2468. Michele Leiriao
2469. Michele Levchik
2470. Michele Marcinko
2471. Michele Siebs
2472. Michele Sullivan
2473. Michele Susson
2474. Michele Winkens
2475. Michelle Cino
2476. Michelle Coleman
2477. Michelle Fine
2478. Michelle Glassman
2479. Michelle Jenner
2480. Michelle Land
2481. Michelle Leonard
2482. Michelle McFadden-DiNicola
2483. Michelle Meisner
2484. Michelle Mistichelli
2485. Michelle Murphy
2486. Michelle Pierce
2487. Michelle Rivenburg
2488. Michelle Smith

- 2489. Michelle Tomasso
- 2490. Michelle Valente
- 2491. Michelle Vandaley
- 2492. Michelle Weaver
- 2493. Mike Allen
- 2494. Mike Ryan
- 2495. Mike Tierney
- 2496. Milissa Wechter
- 2497. Millicent Ansley
- 2498. Min Klein
- 2499. Misally Camacho
- 2500. Mitchell Allerton
- 2501. Molly Clerecuzio
- 2502. Monica Carrico
- 2503. Monica Castellanos
- 2504. Monica Hill
- 2505. Monica Taylor, Ph.D.
- 2506. Monique Corby
- 2507. Monique Randolph
- 2508. Morgan K. Pulcine
- 2509. Munira Jamali
- 2510. Myrna Fichtenbaum
- 2511. Myrtha Lominy-Rhodes
- 2512. Nadia Digregorio
- 2513. Nadine Familo
- 2514. Nan Davis

- 2515. Nancu Shubach
- 2516. Nancy Coffin
- 2517. Nancy Demarco
- 2518. Nancy Dibattista
- 2519. Nancy Gianni
- 2520. Nancy Greco
- 2521. Nancy McKeown-Brand
- 2522. Nancy Parlapiano
- 2523. Nancy Potts
- 2524. Nancy Quinn
- 2525. Nancy Schreiber
- 2526. Nancy Vasquez
- 2527. Narendra Bhojraj
- 2528. Narisa Svetvilas
- 2529. Natalia Ashkenuzi
- 2530. Natalie Jowett
- 2531. Natalie Peretti
- 2532. Natasha Stevenson
- 2533. Nicholas Andreacci
- 2534. Nicole Alzamora
- 2535. Nicole Ardolino
- 2536. Nicole Debeaumont
- 2537. Nicole Grembowitz
- 2538. Nicole Lacovano
- 2539. Nicole Penza
- 2540. Nicole Sanderson

2541. Nicole Schubert  
2542. Nicole Shubert  
2543. Nicole Smith  
2544. Nicole Ventrella  
2545. Nicoletta Slovinski  
2546. Nikki Baker  
2547. Nikki Ferringo  
2548. Nikki Lederle  
2549. Nisha Khanna  
2550. Nissa Paul  
2551. Noemy Sosa  
2552. Nora Krieger  
2553. Nora Linton  
2554. Norah Magrini  
2555. Noreen Staples  
2556. Norman Tankiewicz  
2557. Nuccia Lasal  
2558. Nuno Duarte  
2559. Nyota Shy  
2560. Olatayo Wusu  
2561. Olga Rodriguez  
2562. Paige Besthoff  
2563. Paige Morgan  
2564. Pam Arenad  
2565. Pam Hughes  
2566. Pam Isaacs

- 2567. Pam Schad
- 2568. Pamela Barroway
- 2569. Pamela Boccia
- 2570. Pamela Haviland
- 2571. Pamela Macallister
- 2572. Patricia Adriance
- 2573. Patricia Barone
- 2574. Patricia Bryden
- 2575. Patricia Correa
- 2576. Patricia Marinaro
- 2577. Patricia Martin
- 2578. Patricia Metzger
- 2579. Patricia Shumkey
- 2580. Patricia Sutter
- 2581. Patricia Timen
- 2582. Patrick Fagan
- 2583. Patrick Lenihan
- 2584. Patti Grunther
- 2585. Patty Savulich
- 2586. Paul Casey
- 2587. Paul Chapin
- 2588. Paul Suozzo
- 2589. Paula Greenbaum
- 2590. Paula O'Neill
- 2591. Paula Risoli
- 2592. Paulo Sociedade

2593. Pennie Bigelow
2594. Penny Patnaude
2595. Peter Creekmore
2596. Peter Dionisio
2597. Peter Kim
2598. Peter Scardilli
2599. Peter Stern
2600. Petros Anastasopoulos
2601. Phillip Desousa
2602. Phoebe Spanier
2603. Priscilla Umeizu
2604. Raejoy V.
2605. Rabiyyah Quddus
2606. Rachel Ferat
2607. Rachel Fisher
2608. Rachel Gordon
2609. Rachel Gray
2610. Rachel L. Cicalese
2611. Rachel Lawler
2612. Rachel Mandel
2613. Rajalakshmi Chandra
2614. Ramon Robles-Fernandez
2615. Ramona Deal
2616. Randi Ostrove
2617. Randle Kane
2618. Rebecca Brennan

- 2619. Rebecca Chapman-Smith
- 2620. Rebecca Hitchcock
- 2621. Rebecca M Davis
- 2622. Rebecca Zlotnik
- 2623. Reesa Weinhold
- 2624. Regan Crotty
- 2625. Regina Katzenberg
- 2626. Regina McCaughan
- 2627. Regina Paglia-Smoler
- 2628. Regina Scotti
- 2629. Regina Tuma, PhD.
- 2630. Renee Bang
- 2631. Renee Bogert
- 2632. Renee Hunt
- 2633. Renee Onuoha
- 2634. Rhonda Evans
- 2635. Richard Bozarth
- 2636. Richard D'Avanzo
- 2637. Richard Morinelli
- 2638. Richard Settino
- 2639. Rick Krause
- 2640. Rita Dafonseca
- 2641. Rita Krulewicz
- 2642. Rita McClellan
- 2643. Rita Tice
- 2644. Rob Owens

2645. Rob Riehl  
2646. Robert Del Presto  
2647. Robert Elliott Sr.  
2648. Robert Evans  
2649. Robert Gray  
2650. Robert Palestino  
2651. Robert Quinn  
2652. Robert Roslewicz  
2653. Robert Townsend  
2654. Roberta Kelley  
2655. Roberta Marshall  
2656. Roberta Nelson  
2657. Roberto Ruiz  
2658. Robin Demarsico  
2659. Robin Isserles  
2660. Robin MacCloskey  
2661. Robin Naylor  
2662. Robin Nehila  
2663. Robin Pelham  
2664. Robyn Platis  
2665. Robyn Smith  
2666. Rochelle Schwarz  
2667. Rochelle Tereshko  
2668. Ronni Schwartz  
2669. Ronni Walsh  
2670. Rosa Nicolosi

2671. Rosalia Tornabene
2672. Rosario Certo
2673. Rosario Romero-Rey
2674. Rose Bornstein Bedoya
2675. Rose Cabanas
2676. Rose McCauley
2677. Rose Murray
2678. Rose Oosting, Ph.D.
2679. Roseann Heyl
2680. Rosemarie Armstrong
2681. Rosemary Brockman
2682. Rosemary King
2683. Rosemary McCormack
2684. Rosita Vargas
2685. Roy Shantzis
2686. Russ Kurlak
2687. Ruth Cohen
2688. Ruth Katz
2689. Ryan Giust
2690. Ryan Johnson
2691. Ryan O'Dell
2692. S. Ronga
2693. S. Sewell
2694. Sabrina Wilfrid
2695. Sally Jane Gellert
2696. Sally Lytle

2697. Sama Habibi
2698. Samantha Bassett
2699. Samantha Kelly
2700. Samara Schilens
2701. Edward Tighe III
2702. Samuel Davidowitz
2703. Samuel Davis
2704. Sandie Caetano
2705. Sandra Garcia-Townes
2706. Sandra Melendy
2707. Sandra Moskovitz
2708. Sandra Raisch
2709. Sandra Stanziola
2710. Sandy Abdelaziz
2711. Sandy Russell Jones
2712. Sandy Thomas
2713. Santalynne Federici
2714. Sara Mastellone
2715. Sara Schwartz
2716. Sarah Doremus
2717. Sarah Guy
2718. Sarah O'Farrell
2719. Sarah Shick
2720. Sarah Webber
2721. Sarah Wills
2722. Sarah Young

- 2723. Sari Birardi
- 2724. Sarina Rivera
- 2725. Satenik Margaryan
- 2726. Scott Burzynski
- 2727. Scott Cameron
- 2728. Scott Cumberbatch
- 2729. Scott Riotto
- 2730. Scott Roskos
- 2731. Sean Brennan
- 2732. Sean Pomeroy
- 2733. Selina Brodsky
- 2734. Shakur Williams
- 2735. Shana Filep
- 2736. Shanee Osher
- 2737. Shannon Colonna
- 2738. Shannon Ford
- 2739. Shannon Keogh
- 2740. Shannon Santoro
- 2741. Shannon Tomasula
- 2742. Shara Gilchrist-Hamilton
- 2743. Shari Cohen
- 2744. Shari Kessler
- 2745. Shari Mendelson
- 2746. Shari Platinsky
- 2747. Shari Sullivan
- 2748. Sharita Stinson

- 2749. Sharon Calle
- 2750. Sharon Cooper
- 2751. Sharon Golub
- 2752. Sharon Krellin
- 2753. Sharon Lake
- 2754. Sharon M. Zalepka-Galya
- 2755. Sharon Ortiz
- 2756. Sharon Rusnak
- 2757. Sharon Sullivan
- 2758. Sharyn Infanti
- 2759. Shaunice Adams
- 2760. Shavaun Gliksman
- 2761. Sheila Jain
- 2762. Shelley Molineux
- 2763. Shelly Zanowicz
- 2764. Shena L.
- 2765. Sheridan Novitch
- 2766. Sherri Holston
- 2767. Sherri Maloney
- 2768. Sherri Saldida
- 2769. Sherry Martinez
- 2770. Shiela Fuller
- 2771. Sima Wilken
- 2772. Sondra Mermelstein
- 2773. Sophia Lamberson
- 2774. Sorca Gill

- 2775. Stacey Abate
- 2776. Stacey Amato
- 2777. Stacey Childs
- 2778. Stacey Comerford
- 2779. Stacey Doviak
- 2780. Stacey Friedlander
- 2781. Stacey Gregg
- 2782. Stacey Mitchell
- 2783. Stacey Staub
- 2784. Stacey Walker
- 2785. Staci Schoettler
- 2786. Stacy Owens
- 2787. Stacy Paoella
- 2788. Stacy Schapiro
- 2789. Stefanie Morales
- 2790. Stephani Fried
- 2791. Stephanie Camp
- 2792. Stephanie Canzani
- 2793. Stephanie Casella
- 2794. Stephanie D. Biamonte
- 2795. Stephanie Fryling
- 2796. Stephanie Furrer
- 2797. Stephanie Greeby
- 2798. Stephanie Lipnicki
- 2799. Stephanie Nesser
- 2800. Stephanie Reid

2801. Stephanie Sanchez
2802. Stephanie Sasso
2803. Stephanie Segrest
2804. Stephanie Shaw
2805. Stephanie Silk Says
2806. Stephanie Sorino
2807. Stephanie Transky
2808. Stephanie Vigdor
2809. Stephanie Werner
2810. Stephen Bowles
2811. Steve Ashley
2812. Steve Bossen
2813. Steve Leadley
2814. Steve Redfearn
2815. Steven Deaver
2816. Stewart Gleason
2817. Sue Ade
2818. Sunny Lenhard
2819. Susan Barkowski
2820. Susan Berkey
2821. Susan Boyan
2822. Susan Cauldwell
2823. Susan Freeman
2824. Susan Gehringer
2825. Susan Jolley
2826. Susan Koch

- 2827. Susan Leone
- 2828. Susan Lincoln
- 2829. Susan Maurer
- 2830. Susan Mosebrook
- 2831. Susan Murphy
- 2832. Susan Musto
- 2833. Susan Rainey
- 2834. Susan Sullivan
- 2835. Susan Weinstein
- 2836. Susan Zeger
- 2837. Suzann Duncan
- 2838. Suzanne Forgione
- 2839. Suzanne Martin
- 2840. Suzanne Zimmer
- 2841. T. Hargrove
- 2842. Tami Bradley
- 2843. Tammy Taggart
- 2844. Tania Payamps
- 2845. Tanya Mandap
- 2846. Tanya Seaward
- 2847. Tara Corcoran-Clark
- 2848. Tara Maluszczak
- 2849. Tayler Dash
- 2850. Tekeema Allen
- 2851. Teresa Asams
- 2852. Jay Petrillo

- 2853. Teresa Badalamenti
- 2854. Teresa Barr
- 2855. Teresa Liberal
- 2856. Terese Guerriero
- 2857. Teresa Matvienko
- 2858. Teri Davis
- 2859. Terri Trigg-Scales
- 2860. Terri Wells
- 2861. Terry Turner
- 2862. Thea Celentano
- 2863. Theresa Cecil
- 2864. Theresa Foltiny
- 2865. Theresa Fuller
- 2866. Theresa Stasny
- 2867. Theresa Yoselevich
- 2868. Thomas Filippone
- 2869. Thomas Kuzirian
- 2870. Thomas Volscho
- 2871. Thurman Carey
- 2872. Tim O'Neill
- 2873. Timothy Casale
- 2874. Timothy Knight
- 2875. Timothy Priano
- 2876. Tina Cottingham
- 2877. Tina Delorenzo
- 2878. Tina Desilvio

- 2879. Tina Solak
- 2880. Tiombe Gibson
- 2881. Tobi Goldman
- 2882. Tom Beatini
- 2883. Tom Cecil
- 2884. Tom Vila
- 2885. Tom Violet
- 2886. Toni Clark
- 2887. Toni Horwath
- 2888. Toni Leadley
- 2889. Toni Sotelo
- 2890. Tonya Lunger
- 2891. Tracee Panetti
- 2892. Tracey Bailey
- 2893. Tracey Cabo-Freixedas
- 2894. Tracey Jupinka
- 2895. Tracey Pino
- 2896. Tracey Vitale
- 2897. Traci Jacobs
- 2898. Tracy Buaron
- 2899. Tracy Chambers
- 2900. Tracy Hess
- 2901. Tracy Jenish
- 2902. Tracy Marinaro
- 2903. Tracy Salvatore
- 2904. Tracy Sinatra

2905. Trayce McCullin-Bilal
2906. Trudith Lockspeiser
2907. Tugba Hoguet
2908. Tuyen Teasdale
2909. Twanda Taylor
2910. Tyler Kukla
2911. Ursula Cozzolino
2912. Ursula Glackin
2913. Valerie Hecht
2914. Valerie Sadwin
2915. Valerie Tate
2916. Valerie Tomaszewski
2917. Vanessa Henhaffer
2918. Vanessa Oglesby
2919. Vanessa Solano
2920. Vanessa Stevenson
2921. Veronica Branch
2922. Veronica Leone
2923. Veronica Mehno
2924. Vibeke Guterman
2925. Vicky Bashant
2926. Victor Bayers
2927. Victoria Barton
2928. Vilma Velez-Manning
2929. Vincent Catoggio
2930. Virginia Kostisin

2931. Virginia Manzari
2932. Virginia Peters
2933. Philip Gary Howell
2934. W. Scott
2935. Walter H. Schoepf
2936. Wanda Ferdinand
2937. Warren Crescenzo
2938. Wayne Gottlieb
2939. Wendy Fernandez
2940. Wendy Karch
2941. Wendy Leonhardt
2942. Wendy Nadel
2943. Wendy Ozeri
2944. Wendy Sabin
2945. Wendy Vasquez
2946. William Bron
2947. William Smerdon
2948. Wined Negron
2949. Yana Rodin Tracy
2950. Yesmid Triana
2951. Yogita Fratto
2952. Yvonne Ruiz
2953. Yvonne Williams
2954. Zakiyyah Muhammad
2955. Keith Benson
2956. Dr. Scott Taylor

- 2957. Robert Zywicki
- 2958. Dr. Michael Salvatore
- 2959. Elisabeth Ginsburg
- 2960. David Aderhold
- 2961. Thomas A. Smith
- 2962. Lisa Savoia
- 2963. Mitsui Dave
- 2964. Barbara Peabody
- 2965. Deborah Barnes
- 2966. Marie Blistan
- 2967. Lorraine Gormley-Devine
- 2968. Justin Escher Alpert
- 2969. James Whitescarver
- 2970. Nicole Denton
- 2971. Lisa Bakanas
- 2972. Jeremy Valentin
- 2973. Jill Johnson
- 2974. Jamie Bennett
- 2975. Senator M. Teresa Ruiz
- 2976. Kathleen L. Muse
- 2977. Michael Cascione

***Note: The following comments, responses, and agency-initiated changes were previously made public as part of the agenda materials for the State Board's September 12, 2018, meeting. New comments and responses begin on page 157 with Comment 137.***

1. **COMMENT:** The commenter stated the Department's proposed rulemaking is a course correction and does not negate its past work nor signal defeat, adding that course corrections are often a sign of reflection and ingenuity. The commenter applauded the Department for listening to stakeholders and having the courage to change policy that was not working. **(G)**

**RESPONSE:** The Department thanks the commenter for the support.

- COMMENT:** The commenter stated reducing the number of State assessments required for graduation is beneficial for the following reasons: the Department will continue to have sufficient data and information to identify struggling students; school districts will return some instructional time to classrooms throughout the State; and school districts can allow more students to have alternate pathways to graduate successfully from high school. The commenter added that the Department is not reducing rigor, but is being progressive. **(G)**

**RESPONSE:** The Department thanks the commenter for the support.

- COMMENT:** The commenter stated that an unintended consequence of the current graduation requirements is that a student who does not perform well on State assessments is often required to take an English language arts (ELA) or mathematics remedial class and removed from an elective course in which the student has more interest and that is part of a career pathway. The commenter supported the Department's proposed amendments to the graduation requirements because forcing a struggling student to take remedial classes intensifies the student's level of frustration and reinforces the student's feelings of inadequacy, while the proposed reduction in State high school assessments will remove the punitive aspect of continuous test taking and remedial courses. **(D)**

**RESPONSE:** The Department thanks the commenter for the support.

- COMMENT:** The commenter commended the Department on providing an articulate explanation of the proposed rulemaking for N.J.A.C. 6A:8. The commenter stated that the State has abdicated its responsibility to New Jersey students if one student in New Jersey is harmed by Department policy that results in students feeling like a failure and considering dropping out of high school and the Department fails to take action, even if the consequences were unintended.

The commenter agreed that making at-risk students take multiple assessments does not make sense if the Department, school districts, and parents are getting information they need from Algebra I and ELA 10. **(G)**

**RESPONSE:** The Department thanks the commenter for the support.

- COMMENT:** The commenter supported the Department's proposal to reduce the required State assessments in high school from six to two if the Department can identify the two assessments that provide the greatest predictive value for college and career readiness, and then eliminate redundant areas of assessment to provide more instructional time. **(G)**

**RESPONSE:** The Department thanks the commenter for the support.

- COMMENT:** The commenter asked for confirmation that under the current rules a student's access to alternative assessments for graduation are scheduled to be phased out in the next two years, and that the Department's proposed amendments will allow a student who fails either the ELA 10 or Algebra I assessment to maintain access to alternative assessments for graduation, such as the SAT. **(F)**

**RESPONSE:** Yes, the Department is proposing that students in the class of 2021 and beyond who take but do not pass the Algebra I and/or ELA 10 assessment may avail themselves of the portfolio appeals process or achieve a passing score on an alternative competency test as determined by the Commissioner (including the SAT and Armed Services Vocational Aptitude

Battery - Armed Forces Qualifying Test (ASVAB-AFQT)). The opportunity to access the alternative pathways currently exists for the classes of 2019 and 2020.

7. **COMMENT:** The commenter asked for the rationale behind the previous decision to phase out the alternative pathways for graduation and for the current proposal to retain the pathways. **(F)**

**RESPONSE:** The prior policy was intended to improve student outcomes through high-quality standards aligned to rigorous assessments. There was an expectation that the policy would result in an increase in student performance so students would be better prepared to meet the ELA 10 and Algebra I assessment graduation requirements without relying on alternative assessments. While Algebra I and ELA 10 scores rose incrementally, the policy produced the unintended consequence of miring a student struggling with assessments in a cycle of test taking that has little meaning for the student, produces a consistent affirmation of failure, and takes time away from meaningful investment in remediation and other efforts that can help the student advance toward post-secondary success. The Department it is not walking away from the current policy but, rather, is addressing some of the policy's unintended consequences. The Department's decision to eliminate the phasing out of the alternative assessment reflects a course correction based on data available since the initial implementation that students and school districts require more time to further build capacity to ensure that all students are best prepared to demonstrate mastery through a single assessment.

8. **COMMENT:** The commenter stated that the time necessary to reassess students who previously did not meet expectations on State assessments would be better utilized and spent at a diagnostic level with formative assessments that can better illustrate a student's progress and growth. **(D)**

**RESPONSE:** The Department agrees with the commenter.

9. **COMMENT:** The commenters stated the SAT and ACT are normative-referenced assessments that are not aligned with the New Jersey Student Learning Standards (NJSLS) and Partnership for Assessment of Readiness for College and Careers (PARCC) assessments are criterion-based tests that have a direct correlation to the NJSLS. **(A, C)**

**RESPONSE:** Yes, PARCC assessments are criterion-referenced tests, which means that scores measure how well a student demonstrated proficiency on a specific measure. The score is not relative to how other students performed, as is the case with norm-referenced tests such as the SAT and ACT. New Jersey's current State assessments align to the NJSLS as verified by alignment studies completed by external agencies ([studies](#)) and the United States Department of Education peer review process. For this reason, the primary and preferred method for all students to meet the State assessment graduation requirement is through the NJSLS-aligned assessment.

10. **COMMENT:** The commenter expressed concern that many students take classes to prepare for the SAT or ACT and to increase their scores, so students who come from affluent families are able to take prep classes and, in essence, learn how to do well on those tests. The commenter also cautioned about looking at the SAT and ACT as the State's assessment, which has happened in some states, because of the amount of time and resources spent on improving those scores. **(B)**

**RESPONSE:** At this time, the Department is not proposing to change the two assessments required for high school graduation (ELA 10 and Algebra I). These assessments are aligned to the NJSLS and, because curriculum is required to be aligned to the NJSLS, assessments are aligned to the instruction the student receives in school. If the assessment and instruction are aligned, then the material on which the student is instructed will be the material on which the

student is tested. Through the second phase of assessment outreach, the Department will continue collaborating with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

11. **COMMENT:** The commenter questioned the conclusion that a student who does not pass the ELA 10 or Algebra I assessment should not continue to be tested because it is assumed the student cannot succeed. **(F)**

**RESPONSE:** The Department is not assuming that a student who does not pass ELA 10 or Algebra I cannot succeed. The Department's proposal relies on the theory that requiring students who do not pass Algebra I and/or ELA 10 to take assessments prior to accessing alternative pathways mires students in cycles of failure rather than diverting more resources to meaningful investments in academic support and career preparation opportunities that help students advance toward post-secondary success, as is required in N.J.A.C. 6A:8-3.2. School districts prepare high school students on individualized pathways to post-secondary success. School districts work with each student's unique talents, interests, and abilities to develop pathways that not only meet graduation requirements but also prepare the student to be successful in college or career. It is important to ensure New Jersey students have portals of exit that are designed for their unique pathways, talents, and interests and will position them for post-secondary success. Moreover, providing alternative pathways will allow school districts, educators, and students to reallocate resources previously dedicated to higher-level State assessments to remedial instruction to maximize a student's performance and success.

12. **COMMENT:** The commenter asked if school districts will be able to divert resources that would have gone toward State assessments that no longer will be administered to more instructional time. **(G)**

**RESPONSE:** School districts have discretion over budgets and staff assignments; therefore, school districts could choose to use the available resources for additional instructional time.

13. **COMMENT:** The commenter asked if the Department's decision to reduce the number of State assessments administered in high school was made for financial reasons. **(B)**

**RESPONSE:** No, the proposed reduction in the number of high school State assessments was not a financial decision. However, the Department expects that the proposal will allow school districts to divert resources such as time and talent to better support students' academic needs and customize their preparation for career pathways.

14. **COMMENT:** The commenter asked if any studies or data indicate how much testing is too much testing. The commenter expressed concern that the Department was making this decision based on the feedback from its stakeholder outreach, which represented a small percentage of all stakeholders, instead of formal studies. The commenter further noted that the State assessments are only three hours each and questioned the conclusion that requiring students to retake three-hour assessments is not a good use of time. **(F)**

**RESPONSE:** The Department's proposal comes as a result of an analysis of the amount of time and resources spent on State assessments, when compared to the amount of actionable and usable data derived from them when compared to other instructional strategies for the student and other accountability indicators for the school and school district.

Regarding stakeholder outreach, the Department maintains that speaking in-person with more than 2,000 students, educators, parents, and members of the broader public provided the

Department with rich feedback and actionable recommendations to inform the Department's efforts to improve the State assessment system. These efforts extend beyond the scope of the proposed rulemaking. The feedback that the Department received during the first phase of assessment outreach was also in-line with what the Department has ascertained during the last several years in terms of student performance and participation on the assessments.

15. **COMMENT:** The commenter commended Governor Murphy for focusing on an innovation economy in New Jersey, recognizing that there is a demand for science, technology, engineering, and mathematics (STEM) skill sets, the developing initiatives to encourage individuals to enter STEM fields, and building and maintaining STEM careers in New Jersey. The commenter stated that students will need a mastery of Geometry and Algebra II to enter STEM fields. The commenter also expressed concern about how the State will be able to ensure consistently high-quality curriculum and education in mathematics courses in school districts across the State if Geometry and Algebra II State assessments are no longer administered. **(A)**

**RESPONSE:** The Department agrees that a focus on STEM is worth commending. Geometry (or the content equivalent) and a third year of mathematics that build on the concepts and skills of Algebra I and Geometry are part of the State minimum graduation course requirements. Regardless of whether a course has a related State test, school districts must ensure that students are provided with learning experiences that demonstrate they have met or exceeded the expectations of the NJSLs. The Quality Single Accountability Continuum (QSAC) is the Department's monitoring and district self-evaluation system for public school districts. The system shifts the monitoring and evaluation focus from compliance to assistance, capacity-building, and improvement. QSAC monitoring includes indicators to ensure that school district instruction and programming in mathematics are consistent with the NJSLs and expectations of N.J.A.C. 6A:8A-5.1.

New Jersey's publicly available School Performance Reports provide information on hundreds of school and school district factors that include student participation in availability of STEM coursework and student enrollment in STEM courses, including Advanced Placement courses. Schools and school districts can also discuss STEM programs and initiatives in their School Performance Report narrative. This information provides the Department and school community members with rich information on high school academics, including student access to courses that support student learning in STEM.

16. **COMMENT:** Recognizing that some students struggle taking assessments, the commenter questioned why the State would eliminate four standardized assessments at the high school level. The commenter also expressed concern that the Department would be abandoning a tool to help struggling students by eliminating the four assessments. **(A)**

**RESPONSE:** The Department maintains that State assessments are a valuable tool for educators, students and families. Nevertheless, State assessments are single snapshots of student learning. The Department, school districts, and families share responsibility for preparing high school students for postsecondary success. New Jersey is evolving its priorities to ensure that students have multiple opportunities to demonstrate their readiness and that they are provided the remediation and support they need to increase their performance on State assessments.

17. **COMMENT:** The commenter asked whether the Department will continue to have sufficient data to identify deficiencies or concerns in school districts in light of the proposed reduction of high school assessments. **(G)**

**RESPONSE:** The Department will have sufficient data through its Federal and State accountability systems (New Jersey's State ESSA Plan and QSAC, respectively), to identify schools and school districts that need additional support or intervention

18. **COMMENT:** The commenter asked whether ending the ELA 9 and ELA 11 assessments will eliminate the ability to know whether students, especially high school students who transfer from other states, are meeting expectations or whether curricula is aligned to State standards. The commenter also questioned whether reducing the number of State assessments in high school provides parents with too little information about what their children need to improve. **(B)**

**RESPONSE:** Although State assessment results are an important indicator of student success, there are other indicators high schools use to ensure academic progress. A student transferring into a New Jersey public high school from out of State must be assessed formatively to ensure appropriate placement. Hence, school districts have their own structures for this process. The Department has heard from many superintendents and principals that the high school State assessment results are not a surprise and are mostly in-line with the portfolio of information they already have on students.

19. **COMMENT:** The commenter asked if schools would be less opposed to standardized assessments in Geometry and Algebra II if the results were not made public. **(F)**

**RESPONSE:** The Department has not found substantive evidence that students and school districts are opposed to State assessments due to public display of assessment results.

20. **COMMENT:** The commenter suggested that the Department not reduce the number of State assessments in high school and, instead, create an exception for students who struggle with ELA 10 and Algebra I, as they may represent a small percentage of the total student population. The commenter stated maintaining all of the high school assessments will allow the Department to continue to evaluate the quality of ELA and mathematics courses across the State. The commenter further supported finding a way to support struggling students without eliminating particular State assessments for all students. The commenter also asked for the percentage of students who have difficulty passing State assessments and, therefore, are subjected to additional testing. **(A)**

**RESPONSE:** The current rule that requires students who do not pass ELA 10 and/or Algebra I to take all applicable end-of-course assessments, which include at least three additional end-of-course assessments, applies to approximately 40,000 to 60,000 students per year. According to PARCC results from 2018-2019, approximately 46.2 percent of approximately 110,912 students taking the Algebra I assessment did not pass and approximately 49 percent of approximately 92,434 students taking the ELA 10 assessment did not pass. Most students who took the ELA 10 assessment in 2018-2019 will be in the graduating class of 2021.

The Department will continue to monitor and support schools and school districts through both Federal and State accountability systems (New Jersey's State ESSA Plan and QSAC, respectively) to ensure that all students have access to high-quality instruction. At the August 1, 2018, State Board meeting the Department provided data demonstrating that the high school assessments in ELA 9 and 11, Geometry, and Algebra II do not provide enough unique or new data to the Department or broader public to warrant the resources necessary to administer the additional assessments. Finally, New Jersey's publicly available School Performance Reports provide information on hundreds of school and school district factors that include student participation and achievement on PSATs, SATs ACTs, and Advanced Placement courses. This information provides the Department and school community members with rich information on

high school academics, including student access to and performance in courses that support student learning, in ELA and mathematics.

21. **COMMENT:** The commenter referenced a report issued by the New Jersey Department of Labor and Workforce Development in March 2018 showing that 17 of the top 25 professions in New Jersey require a bachelor's degree and that the fastest growing job sectors in the State – health care and financial services – require a bachelor's degree. Recognizing the State is trying to align education to workforce needs, the commenter stated that the Department should be advocating for more rigorous mathematics and sciences and not eliminating the ability to measure performance in those subjects. **(A)**

**RESPONSE:** Reducing the number of State assessments will not change the rigor of mathematics and science curricula or reduce expectations for high performance in mathematics and science courses. Performance in mathematics will continue to be measured through formative assessments, grades, and final examinations and all students will continue to be assessed on the State science assessment, which is one metric of student performance in QSAC beginning in 2018-2019. See the response to Comment 15 for additional ways the Department ensures students receive rigorous coursework in STEM subjects.

The Department will continue to monitor and support schools and school districts through both Federal and State accountability systems, (New Jersey's State ESSA Plan and QSAC, respectively) to ensure that all students have access to high-quality instruction. Additionally, New Jersey's publicly available School Performance Reports provides information on hundreds of school and school district factors that includes student participation and achievement on PSATs, SATs ACTs, and Advanced Placement courses. The reports provide the Department, school districts, and the public with additional high school academic information to assess student access to, and performance in, courses that support student learning, particularly in ELA and mathematics.

22. **COMMENT:** The commenter expressed concern that reducing the number of State assessments will not help shrink the achievement gap between Hispanic and African-American students and their white counterparts. **(A)**

**RESPONSE:** Like the commenter, the Department remains committed to identifying ways to eliminate gaps among student groups in academics and, therefore, career and college opportunities. While State assessments provide one helpful tool for the State's identification of achievement gaps, the Department maintains that the proposed rulemaking will allow the State and school districts to divert more resources to meaningful investments in academic support and career preparation opportunities that help students advance toward post-secondary success. Under the Department's proposal, students currently enrolled in high school must still take and pass Algebra I and ELA 10, or utilize one of the alternative pathways, to meet the graduation assessment requirements. The proposed rulemaking is an interim proposal to streamline the high school assessment system as part of the transition to the next State assessment system. Upon review of the graduation requirements for the classes of 2020 and beyond, the Department found aspects of the current rules to be overly complex and to have an unintended negative consequence on some students, particularly in light of the number of standardized tests administered in high school, including non-state tests such as the PSAT, SAT, ACT, and Advanced Placement. The Department anticipates initiating another rulemaking in the near future to implement the next phase of the assessment system after the full transition plan is formulated in collaboration with stakeholders from across the State.

Achievement gaps between different groups of students may lead to students becoming disaffected by the cycle of test taking that has little meaning for them, sends a message of failure, and takes time away from meaningful investment in remediation, instruction, and other efforts that can help the students advance toward post-secondary success.

23. **COMMENT:** The commenter expressed concern that the State is backtracking in its ability to help struggling students as schools will have less information on student performance. The commenter stated that for a student who does not perform well on the eighth grade State assessments, the student's school will lack continuous information to indicate whether the student is improving in critical thinking and other skills, as the next State assessment would not be administered until the end of 10th grade. The commenter asked how the Department recommends handling new students who have transferred to a high school from another State, school district, or country, when the new school does not have the benefit of seeing the results of the student's eighth grade assessment. **(B)**

**RESPONSE:** The Department points to best practices already in place across the State. School districts are well equipped to identify where a student should be placed academically. School districts administer locally selected assessments to determine a student's best placement. In addition, school districts look at a student's previous grades, formative assessments, and courses completed. State assessments do not necessarily provide the specific information that a teacher needs to analyze the root cause of a student's academic struggles and to identify learning gaps. Formative assessments, along with strategies that target the learning standards with which a student struggles, are better tools to help close learning gaps.

24. **COMMENT:** The commenters expressed concern that State assessments will not be administered annually in high school under the Department's proposal. The commenters asked how the State will ensure progress for students not proficient on eighth grade assessments if State assessments are not administered annually in high school. **(B, F)**

**RESPONSE:** While State assessments are a valuable tool for understanding student performance, they are certainly not the only tool. In fact, daily assignments, formative assessments, and benchmark assessments are example instructional tools that provide more real-time and specific information that a teacher needs to analyze the root cause of a student's academic struggles and to identify learning gaps. Formative assessments, along with strategies that target the learning standards with which a student struggles, can be used to help close learning gaps.

25. **COMMENT:** The commenter questioned whether standardized tests should be administered at all if the State is now going to rely on other methods of determining a student's progress and proficiency instead of annual State assessments. **(F)**

**RESPONSE:** The Department is not proposing to eliminate all State assessments because they are a valuable contribution to understanding student performance, but is "right sizing" the role of State assessments with all the other indicators the State, school districts, and schools have on student, school, and school district performance.

26. **COMMENT:** The commenter questioned why a student who does not perform well on a State assessment in grade eight would not be tested again until grade 10. The commenter stated that scenario makes it seem as if the State is giving up on that student. **(F)**

**RESPONSE:** While State assessments are a valuable tool for understanding student performance, they are not the only tool. Daily assignments, formative assessments and

benchmark assessments are example instructional tools that provide more real-time and specific information that a teacher needs to analyze the root cause of a student's academic struggles and to identify learning gaps. Formative assessments, along with strategies that target the learning standards with which a student struggles, can be used to help close learning gaps.

The State is in no way giving up on New Jersey students. The Department provided at the August 1, 2018, State Board meeting data demonstrating that the high school assessments in ELA 9 and 11, Geometry, and Algebra II do not provide enough unique or different data to the Department or broader public to warrant the resources necessary to administer the additional assessments. Accordingly, the Department will continue to have sufficient data to review to carry out its responsibility to identify what schools and school districts require additional supports to better serve its students.

27. **COMMENT:** The commenter stated that not every school district provides a high-quality education and questioned the ability of some school districts to track a student's progress if that student does not do well in eighth grade State assessments and the State is not testing that student again for a few years. The commenter also expressed concern that not every school district will fulfill its responsibility to provide services to a struggling student to ensure that the student demonstrates growth. (A)

**RESPONSE:** The Department appreciates the commenter's concerns and remains committed to continuing to monitor and support schools and school districts through both Federal and State accountability systems (New Jersey's State ESSA Plan and QSAC respectively) to ensure that all students have access to high-quality instruction.

While State assessments are one tool to monitor student progress, they are not the only measure. At the August 1, 2018, State Board meeting, the Department provided data demonstrating that the high school assessments in ELA 9 and 11, Geometry, and Algebra II do not provide enough unique or different data to the Department or broader public to warrant the resources necessary to administer the additional assessments. The Department's proposals rely on a theory of action that State assessments such as ELA 9 and 11, Geometry and Algebra II do not inherently ensure that all school districts fulfill their responsibility to provide requisite services for students. Instead, the proposal relies on the theory that, combined with existing accountability measures, a streamlined high school assessment system will focus valuable resources directly to initiatives and services to allow the State and school districts to divert valuable resources to remediation and instructional practices for all students, but particularly for struggling students.

28. **COMMENT:** The commenter stated that equity is providing an individual student what he or she needs to succeed and high-stakes standardized assessment is almost the exact opposite because it expects every single student to achieve the exact same thing even though students' various dispositions are incredibly unique. (G)

**RESPONSE:** State assessments are a common metric for all students in New Jersey to determine the students' current level of understanding of the NJSLs. State assessments are one measure among many that the State and educators use to determine areas of strengths and weaknesses in student learning so educators may then provide the necessary student supports to meet students' unique academic needs. The Department is committed to maintaining the same rigorous expectations for all students, while differentiating instruction, preparing high school students for individualized pathways to post-secondary success, assessment accommodations, and modifications to provide students with equitable, not the same, academic supports.

29. **COMMENT:** The commenter stated that the standardized test is not the sole factor in predicting student achievement and that every aspect of a school district must be examined. The commenter also stated that assessment outcomes in a wealthier school district could lead someone to conclude it is a high-performing school district, but a closer examination of the data and student subgroups within the school district would reveal a large achievement gap between Hispanic and African-American students and their white counterparts. The commenter stated it is more difficult to identify underperforming student subgroup populations without standardized assessments. (A)

**RESPONSE:** The Department agrees with the importance of looking beyond overall averages of proficiency and to closely review the performance of all students and individual subgroups. ESSA and [New Jersey's State ESSA Plan](#) requires the Department to utilize State assessments and other metrics such as academic growth, graduation rates, chronic absenteeism rates, and English language learners' (ELLs') progress toward English proficiency to identify which schools need comprehensive and targeted support. New Jersey's State ESSA Plan focuses on student group performance by equally weighing subgroup performance and whole school averages so historically underrepresented student groups are not masked within the performance of the larger school population.

30. **COMMENT:** The commenter asked what happens to school districts when students do not perform well on State assessments. (A)

**RESPONSE:** New Jersey's measures of Federal, State, and public accountability remain strongly intact under its State ESSA Plan and QSAC. Through these systems, the Department reviews performance measures such as proficiency, growth, graduation rates, chronic absenteeism rates for more than 2,500 schools and almost 600 school districts. Schools targeted for comprehensive or targeted support receive that support through the Division of Field Services.

31. **COMMENT:** The commenter asked if school districts are taking action with respect to identification of low-performing subgroups, noting that data from wealthier school districts have shown for many years that African-American and Hispanic students are performing lower than their white counterparts in the school district. The commenter questioned whether the leaders of those school districts are taking action to address low-performing subgroups. (A)

**RESPONSE:** Like the commenter, the Department remains committed to identifying ways to eliminate gaps among student groups in academics and, therefore, career and college opportunities.

Data from the New Jersey's School Performance Reports show that school leaders across the State are addressing in-school or in-school district gaps to varying degrees of success. The Department remains committed to using data and carrying out New Jersey's ESSA State Plan to identify schools that need additional comprehensive and targeted support based, in part, on subgroup performance. A key aspect of the Department's support starts with helping schools conduct comprehensive needs assessments and root cause analyses so that once gaps are identified, schools can dig deeper into data to identify root causes and then implement best practices to work toward closing achievement gaps. The Department will also use data to identify schools and school districts that are meeting the needs of diverse learners so they may share their best practices with other schools and school districts.

32. **COMMENT:** The commenter asked why the Department is reducing the amount of time necessary to take State assessments. The commenter noted that the State assessments are only

three hours each and questioned the conclusion that requiring students to retake three-hour assessments is not a good use of time. **(F)**

**RESPONSE:** Reducing the number of hours students spend taking State assessments will increase instructional time throughout the year, while maintaining the longitudinal data story that is place for each student.

The Department's proposal comes as a result of an analysis of the amount of time and resources spent on State assessments, when compared to the amount of actionable and usable data derived from the assessments when compared to other instructional strategies for the student and other accountability indicators for the school and school district.

33. **COMMENT:** The commenter stated it is important to recognize that almost every school district in the State is administering formative and summative assessments during the course of the academic year and is gleaning data related to subgroup performance without relying upon State assessments. **(G)**

**RESPONSE:** The Department agrees with the comment.

34. **COMMENT:** The commenter asked if Massachusetts, which ranks slightly higher than New Jersey in national education standings, is administering the minimum number of high school assessments required by Federal law. **(B)**

**RESPONSE:** Massachusetts administers one assessment each in ELA, mathematics, and science at the high school level.

35. **COMMENT:** The commenter asked if the Department can add a mandatory science assessment. **(F)**

**RESPONSE:** The Department is required by Federal law to administer a science test in high school. The Department field tested a next-generation high school science assessment in spring 2018. This assessment will be administered in 2019 to all students in grade 11 but is not a graduation requirement.

36. **COMMENT:** The commenter asked why teaching students the NJSLs so students are successful on a State assessment that reflects the standards does not provide students with appropriate instruction. **(F)**

**RESPONSE:** These assessments are aligned to the NJSLs and, because curriculum should be aligned to the NJSLs, assessments are aligned to the instruction the student receives in school. If the assessment and instruction are aligned, then the material on which the student is instructed will be the material on which the student is tested. An assessment does not provide instruction but, rather, provides information to educators on whether students are meeting the NJSLs. Throughout the first phase of assessment outreach, the Department heard from the field a clear need to build capacity in the understanding of the NJSLs and in data literacy, so student results can be interpreted, learning deficits identified, and instruction improved to better prepare students for when the assessment is re-administered.

37. **COMMENT:** The commenter asked if New Jersey's national ranking in education was different prior to PARCC or if the rigor of the NJSLs and PARCC assessment contributed to the State's high ranking. **(B)**

**RESPONSE:** New Jersey has ranked high nationally for many years. New Jersey has had a strong assessment system since the early 2000s; the Department has enhanced and changed the assessments based on the adoption of the NJSLs, making the assessments more rigorous. The Department wants New Jersey to be a national leader in a next generation State assessment system that is more individualized to the needs of New Jersey residents.

38. **COMMENT:** The commenter asked what percentage of students who pass the Algebra I assessment do not take the Geometry or Algebra II assessments. **(F)**

**RESPONSE:** Of students who passed the Algebra I assessment in the 2014-2015 school year, 90.1 percent took an additional mathematics assessment (either Geometry or Algebra II) and 68.9 percent took two additional mathematics assessments (both Geometry and Algebra II). This means that 9.9 percent of students who passed Algebra I in the 2014-2015 school year did not take any further high school mathematics State assessments and 31.1 percent of these students took only one additional high school mathematics State assessment (Geometry or Algebra II).

39. **COMMENT:** The commenter stated that many students are not motivated to perform well on State assessments because students do not find value in the tests. The commenter asked how the lack of student motivation affects the assessment data and whether the Department has considered the issue. The commenter also asked if reducing the number of assessments will help motivate students to perform well. **(H)**

**RESPONSE:** The Department has heard from educators and students across the State that student motivation is poorly aligned with State assessment graduation requirements. This sentiment has been voiced by not just advanced learners who lack the motivation to perform well on State assessments, but also students who struggle with tests, are new to the country, or have responsibilities at home that may make tests a less meaningful activity to them. These students do not see the value as they prepare for post-secondary life because there is not a value placed in college admission or job criteria on State assessments. The Department's proposed rulemaking seeks to address this issue by reducing the number of State assessments administered in high school.

40. **COMMENT:** Citing concerns that high-stakes testing is putting undue pressure on students, the commenter questioned the premise that students should not be put in stressful situations while in school so students can be prepared for career, college, and life. The commenter asked whether any studies show that high-stakes assessments are bad for students. **(F)**

**RESPONSE:** There is value in rigor and in having students persist in difficult tasks. Students have the capacity to grow and learn from failure if they are being challenged at appropriate levels for their development. However, requiring students to persist in taking a series of increasingly difficult assessments when they have already demonstrated a need for remediation on the less difficult assessments sends a message of persistent failure to students.

41. **COMMENT:** The commenter asked for clarification that the assessment data provided by the Department in its [presentation](#) was for the class of 2019 and asked if 11th grade data was available for the class of 2019. **(B)**

**RESPONSE:** The cohort data presented was a subset of the class of 2019 – specifically, 66,000 students from the class of 2019 who took ELA 8, ELA 9, and ELA 10 PARCC assessments in eighth, ninth, and 10th grade. The data showing results for students who took PARCC assessments in 11th grade was not available at the time of the August 1, 2018 State Board meeting, but the Department will provide the data to the State Board at the September meeting.

42. **COMMENT:** The commenter asked what percentage of students in grades eight through 10 opted out of PARCC assessments. The commenter also asked if students who opted out of taking PARCC assessments are reflected on the graph showing the class of 2019 cohort data for ELA assessments from grades eight through 10. **(B)**

**RESPONSE:** Because student refusals are captured in assessment codes that are used for a multitude of circumstances (for example: incorrect accommodations assigned to a student or student tested was assigned incorrect grade-level assessment, amongst others) the number of students who have refused the assessment is incalculable.

The data provided to the State Board includes only students who took all three ELA assessments between eighth and 10th grades and does not reflect any data on students who chose not to take the assessments.

43. **COMMENT:** The commenter asked whether 10,000 fewer students in the class of 2019 took the ELA 9 assessment than the ELA 8 assessment based on the data presented by the Department at the August 1, 2018, State Board meeting. **(E)**

**RESPONSE:** No, 88,421 students from the class of 2019 took the ELA 8 assessment in 2014-2015, including fall block administration. In 2015-2016, 97,041 students took the ELA 9 assessment. Therefore, 8,620 more students took the ELA 9 assessment than the ELA 8 assessment.

44. **COMMENT:** The commenter disputed the Department's conclusion that student performance did not improve on ELA PARCC assessments from eighth through 10th grades. The commenter contended that the 2019 cohort data presented by the Department shows a 15- to 20-percent increase in the number of students meeting expectations between eight and ninth grade. **(F)**

**RESPONSE:** The information provided was intended to illustrate that the ELA 8 assessment is predictive of performance on ELA 10.

45. **COMMENT:** The commenter asked if the questions on the assessment were developed over the years within the PARCC consortium. The commenter asked whether New Meridian owns the assessment questions that were initially developed by the PARCC consortium. **(A)**

**RESPONSE:** New Meridian explained that the states in the PARCC consortium transferred ownership of the PARCC intellectual property to the Council of Chief State School Officers (CCSSO) in 2016 with the understanding that an independent third-party membership organization would be a better entity to hold the test content for the long-term sustainability of its use and value. CCSSO awarded New Meridian the contract to manage and administer the assessment and to act as CCSSO's agent to license that content to any state that would like to use it in its state assessment program. New Meridian explained that the test content has a shelf life of about three years so assessment items can be released publicly after their use. New content is continuously being developed, field tested, and made operational. New Meridian stated that test development is an ongoing process of developing a shared pool of content that states can license through a subscription model to continually refresh a state-specific, customized assessment.

46. **COMMENT:** The commenter asked about the correlation between PARCC results in New Jersey for students in grades four through eight and the National Assessment of Educational Progress (NAEP) results. **(A)**

**RESPONSE:** New Meridian confirmed that there is a correlation between the results from the two assessments. New Meridian explained that the “honesty gap” is framed by looking at the percentage of students who are considered proficient on a state assessment versus the percentage of students in that state who are considered proficient on NAEP. In New Jersey, the proficiency standard either approaches very closely or exceeds the proficiency standard on NAEP. New Jersey also is among the top 10 states in terms of the proficiency standard approaching or exceeding the NAEP proficiency standard.

47. **COMMENT:** The commenter asked who develops the assessment items and whether New Meridian subcontracts test development to a third party or has an in-house research and development team. **(G)**

**RESPONSE:** New Meridian explained that it has in-house psychometric test design and development staff but also has subcontractors (Pearson and WestEd) that develop content and conduct the test development processes. New Meridian added that 150 educators from across the participating states review every single assessment item for content standards alignment, accessibility, and fairness. New Meridian commented that using state educators to review assessment items is an unprecedented approach. New Meridian also stated the 150 educators include staff from departments of education and classroom teachers from across all participating states, with more than half of the educators being classroom teachers.

48. **COMMENT:** The commenter asked where the assessments are being field tested and how New Meridian uses field testing to measure the effectiveness of an assessment item. **(G)**

**RESPONSE:** New Meridian stated that all participating states field test assessment items across their respective states. New Meridian explained that field testing is critical as it provides data about the difficulty of an assessment question and how well it discriminates in terms of student ability. New Meridian stated the data from field testing is used to ensure a balanced assessment with items that are not biased in any way toward any student subgroup.

49. **COMMENT:** The commenter asked how many of the assessment items are released annually to educators and questioned whether it is a good thing for educators to be able to see the types of assessment items. **(G)**

**RESPONSE:** New Meridian explained that New Jersey currently releases one-third to one-half of an assessment blueprint per year, varying slightly by grade and subject area. New Meridian stated this significantly exceeds the amount of test items that most states release and, in fact, many states do not release any test items. New Meridian stated it is beneficial to educators to see the types of assessment items.

50. **COMMENT:** The commenter asked if New Meridian is concerned about the possibility that expectations in New Jersey could be too high and exacerbates achievement gaps among student subgroups. **(G)**

**RESPONSE:** New Meridian stated that students’ readiness for college and career has impacts on their future outcomes in life. New Meridian also stated student academic readiness and ability to matriculate into post-secondary education, including four- and two-year college, technical programs, or the military, is a critical factor, but not the only one, as to whether students persist, continue their first year, graduate, and get a degree or certificate. New Meridian explained that the analyses completed have only looked at the correlation between how students perform on state assessments and if they pass first-year post-secondary courses. New Meridian also stated

that longer, longitudinal studies will evaluate whether students actually graduate with a degree or a certificate.

New Meridian added that curriculum is the more important indicator of post-secondary readiness than state assessments, and that states should be focusing on ensuring a rigorous sequence of high school courses for all students more so than the appropriate cut score on an assessment.

51. **COMMENT:** The commenter asked if there is any data that indicates students and teachers rise to the challenge to meet higher standards and expectations set through cut scores. **(F)**

**RESPONSE:** New Meridian stated that meeting high expectations takes a systemic commitment from a state and school districts and that states have raised expectations by adopting higher performance standards, setting higher proficiency standards on assessments, and elevating next generation learning standards. New Meridian stated the efforts have raised the bar for all students by focusing on critical thinking and mathematical modeling. New Meridian added that achieving that transformation also requires curriculum alignment, transparency on assessments, and strong professional development to help teachers understand an assessment's expectations.

52. **COMMENT:** The commenter asked why the SAT and ACT are not an adequate assessment for measuring proficiency on New Jersey Student Learning Standards (NJSLS). **(F)**

**RESPONSE:** New Meridian responded that a balanced system of assessments in high school achieves multiple purposes and outcomes and that the SAT and ACT have their value. New Meridian also stated whether the SAT and ACT are suitable measures of student mastery of the NJSLS comes down to alignment and how well the tests are aligned to the high school learning standards for mathematics and English language arts (ELA). New Meridian also stated the SAT and ACT have certain constraints in terms of accessibility and accommodations, whereas a state-specific assessment is designed to better address accessibility and accommodations.

53. **COMMENT:** The commenter asked about how New Meridian views the SAT or ACT in terms of measuring college readiness, especially since many colleges still use the assessments for admissions purposes. **(E)**

**RESPONSE:** New Meridian stated that the SAT has a de facto value because higher education institutions require candidates for admission to take the assessment, but colleges and universities use the SAT or ACT score in combination with transcript and grade point average. New Meridian also stated the highest predictor of college performance is high school grades, although there is an incremental value of the SAT or ACT.

54. **COMMENT:** The commenter asked whether New Meridian provides tools to help the Department identify school districts that are perhaps assisting a particular student subgroup based on assessment outcomes to ensure there is equity throughout the State. **(B)**

**RESPONSE:** New Meridian explained that New Jersey is provided State assessment data aggregated at multiple levels, which gives the State the tools necessary to conduct any analysis on student subgroup populations.

55. **COMMENT:** The commenter asked if State assessment data provided is specific enough for a school district to pinpoint students who need extra assistance or who are not reaching their potential. The commenter further asked if State assessment results are made available to school

districts in a timely manner so results can be considered when setting a student's schedule for the school year. **(B)**

**RESPONSE:** New Meridian explained that the State begins to receive preliminary data within four weeks of the close of the testing window. New Meridian stated individual student data is aggregated up to school, school district, and State levels. New Meridian further explained that it supports the Department in preparing individual student reports to be provided to educators, students, and families. New Meridian also stated the data is provided to the State in mid-summer and will be provided even earlier because of changes to the assessment design that will enable it to be scored faster.

56. **COMMENT:** The commenter stated that one of the concerns the Department has heard from many stakeholders is the amount of time the State assessment takes. The commenter asked how much time the State assessment takes on average. **(B)**

**RESPONSE:** New Meridian responded that each State assessment per subject area previously took four hours, but the time will be reduced to three hours per subject starting with the 2019 administration.

57. **COMMENT:** The commenter asked if other states are reducing the amount of time spent on their state assessments. The commenter also asked if New Jersey will be able to compare 2019 State assessment results to previous years even with the reduction in time. **(B)**

**RESPONSE:** New Meridian responded that other states have expressed interest in reducing that amount of time needed to take their assessments and it is a national trend.

New Meridian emphasized it began developing a shorter assessment in 2017 and has taken a rigorous approach to the assessment's content and psychometrics. New Meridian noted that the shorter assessment is a subset of the longer test administered in New Jersey in spring 2018. New Meridian also stated the shorter assessment will maintain strong coverage of the NJSLs, which was confirmed by an external alignment analyses, and the signature elements of last year's test that measure a student's ability to reason critically from textual evidence and use mathematical reasoning to solve authentic problems. New Meridian also stated that the shorter assessment will maintain the same scoring scale as the longer assessment, which was benchmarked for college and career readiness, thus enabling the State to maintain longitudinal comparability back to the 2015 baseline assessment. New Meridian explained the comparability will ensure that growth and longitudinal measures will not be disrupted.

58. **COMMENT:** The commenter asked whether certain elements of the NJSLs that previously were tested will be left out of the shorter assessment and whether educators will continue to receive the evidence standards analysis/content standards report. **(F)**

**RESPONSE:** New Meridian replied that no learning standards will be untested in the shorter State assessment. New Meridian stated the level of detail or depth may be reduced for some of the NJSLs. New Meridian also stated New Jersey's mathematics standards focus on core competencies and then supplemental competencies by grade level and the shorter assessment will maintain a strong focus on the core competencies while still measuring some of the supplemental competencies. New Meridian emphasized that it has carefully maintained a very strong alignment to the NJSLs in developing the shorter assessments. New Meridian also confirmed that educators will continue to receive the content standards reports.

59. **COMMENT:** The commenter asked who scores the written portion of the State assessment. **(G)**

**RESPONSE:** New Meridian explained that the State’s test administration vendor scores the assessment. New Meridian further explained that it partners with states to design and develop assessments and then states enter into a separate contract with a test administration vendor for scoring and reporting.

60. **COMMENT:** The commenter expressed concern that the Department has proposed to reduce the number of high school assessments from six to two and while reducing by 25 percent the number of hours spent on the State assessments. The commenter questioned whether six hours of testing (three hours per subject matter) is an appropriate amount of time to adequately determine the quality of a high school’s curriculum and the quality of school districts. (A)

**RESPONSE:** New Meridian noted the shortened New Jersey assessment will be the longest assessment administered in the country New Meridian added that the goal is to balance testing time with ensuring the assessment provide sufficient and useful information. New Meridian stated that New Jersey has been committed to measuring deeper learning competencies (i.e., 21<sup>st</sup> century competencies), including critical thinking, reasoning, research, and communication, which cannot be measured with a short, superficial test. New Meridian emphasized that New Jersey’s assessment is rigorous with extended tasks, and that three hours strikes an appropriate balance between testing time and gathering useful data from the assessment.

61. **COMMENT:** The commenter questioned how the Department can ensure there are equitable standards and curriculum across the State if the Department eliminates standardized assessments for Geometry and Algebra II. The commenter stated that equity is at the very core of why the State administers high-quality standardized assessments. (A)

**RESPONSE:** New Meridian explained that assessment is one tool in achieving equity, with the most important tool being curriculum and ensuring that New Jersey’s students have an academically intense curriculum of courses by the time they graduate. New Meridian explained that curriculum is the best predictor of post-secondary success.

New Meridian also explained that another component of preparing students for college and career is having an early predictive measure of whether students are on track to graduate – and the Algebra I and English 10 assessments are highly predictive of college and career readiness. New Meridian stated achieving proficiency on the ELA 10 exam predicts an 89 percent likelihood of achieving a C or greater in college and achieving proficiency on the Algebra I assessment predicts an 85 percent likelihood of achieving a C or greater. New Meridian stated that predictive capabilities of the two State high school assessments are higher than the SAT benchmarks. New Meridian further explained the other purpose of end-of-course assessments is to demonstrate the level of rigor, scope, and quality of a high school course. New Meridian also stated strong principal leadership and training also help ensure equitable standards and curriculum across the State. See the response to Comment 93 for the Department’s response to this question.

62. **COMMENT:** The commenter asked if PARCC can enhance a student’s critical thinking skills. (B)

**RESPONSE:** New Meridian replied that an assessment focused on critical thinking, reasoning from evidence, mathematical modeling, and problem solving using cross-disciplinary texts in sciences and social studies is an excellent assessment that can enhance students’ critical thinking skills and help teachers understand and model how to develop those skills.

63. **COMMENT:** The commenter expressed support for the proposed rulemaking as a first step in developing a State assessment system that will best serve students. The commenter stated that student assessment is an integral part of the instructional process that is inextricably linked to standards, a viable curriculum, and strong instructional practice. The commenter also stated the State must transition to a balanced assessment that drives continuous improvement of teaching and learning. The commenter further stated the next State assessment system must be aligned with the rigorous NJSLs in a way that ensures the resulting data provides students, parents, and educators with actionable and timely information about what students know, understand, and can do in relation to the standards. (18)

**RESPONSE:** The Department thanks the commenter for the support.

64. **COMMENT:** The commenter stated the proposed rulemaking strikes an appropriate balance of continuing Statewide collaboration on the development of the next State assessment system while protecting students during the development process. The commenter stated the interim period before the next assessment system will allow educators and the Department to address long overdue work such as unpacking the NJSLs to ensure the final State assessment system is focused on assessing commonly defined goals across school districts. The commenter further stated the development process will provide time to ensure the new State assessment system is sufficiently rigorous to meet or exceed current ELA and mathematics proficiency standards for college and career readiness and a State-endorsed high school diploma while continuing to identify performance gaps. (18)

**RESPONSE:** The Department thanks the commenter for the support.

65. **COMMENT:** The commenter supported the proposed amendments to N.J.A.C. 6A:8 and stated the proposed changes will benefit students and school district staff. The commenter stated the Department's recommendations, including reduced testing times for all State assessments and fewer State high school assessments, are considerate of the needs of the students, parents, teachers, school library media specialists, administrators, and the school community. The commenter stated the proposed amendments will allow school libraries to be open and available for students rather than being used as a testing site or closed during testing periods. The commenter also stated that less testing time and fewer high school assessments will provide more time for academic research. The commenter further stated the proposed amendments will allow school library media specialists to provide students with access to technology and other resources, to empower students to achieve success through inquiry-based, collaborative school library programs, and to be educational leaders in their school communities. (7)

**RESPONSE:** The Department thanks the commenter for the support.

66. **COMMENT:** The commenters commended the Department for engaging stakeholders to discuss the future of State assessments. (9, 10, 12, 15, 17, 18, 19, 21)

**RESPONSE:** The Department thanks the commenters for the support.

67. **COMMENT:** The commenter supported the Department's efforts to reduce testing and urged adoption of the proposed amendments. The commenter stated that assessments should be evaluating students' basic, everyday life skills. (14)

**RESPONSE:** The Department thanks the commenter for the support.

68. **COMMENT:** The commenter expressed support for the proposed rulemaking and said the amendments are positive toward changing the “test and punish” culture that has developed in New Jersey and throughout the country. **(10)**

**RESPONSE:** The Department thanks the commenter for the support.

69. **COMMENT:** The commenter supported the proposed rulemaking because the proposed amendments are a small, but important, step by the State to reevaluate its commitment to high-stakes standardized testing and to consider what is best for students and public education in New Jersey. The commenter stated that it was time to move away from PARCC and urged the State Board to approve the amendments. The commenter stated reducing the number of high school State assessments to two from six will keep New Jersey compliant with Federal law and restore some sanity to high school students’ lives and schedules. **(15)**

**RESPONSE:** The Department thanks the commenter for the support.

70. **COMMENT:** The commenters supported the reduction in the amount of time it will take to administer each State assessment. **(9, 10, 2)**

**RESPONSE:** The Department thanks the commenters for the support.

71. The commenter expressed support for a decrease in the number of required assessments, as well as ensuring that assessment results are available to parents, students, and teachers as quickly as possible. **(2)**

**RESPONSE:** The Department thanks the commenter for the support.

72. **COMMENT:** The commenter supported the proposed amendments to N.J.A.C. 6A:8. The commenter supported shorter testing times, which the commenter stated will benefit students and staff by increasing access to school libraries and school library media specialists, and will have a positive impact on student academic achievement and success. **(20)**

**RESPONSE:** The Department thanks the commenter for the support.

73. **COMMENT:** The commenter expressed support for the proposed amendments to N.J.A.C. 6A:8 that will decrease the number of required State assessments while maintaining ELA 10 and Algebra I as high school graduation requirements. The commenter stated the time required to prepare for, and administer, the six high school assessments was excessive and took away critical time from career and technical education (CTE) programs, especially shared-time CTE programs. **(21)**

**RESPONSE:** The Department thanks the commenter for the support.

74. **COMMENT:** The commenter expressed support for the elimination of ELA 9, ELA 11, Algebra II, and Geometry assessments. The commenter stated the four assessments provide no purpose, are a time strain for students and teachers, and spend education funds that are needed elsewhere in schools. **(10)**

**RESPONSE:** The Department thanks the commenter for the support.

75. **COMMENT:** The commenter expressed support for proposed N.J.A.C. 6A:8-5.1(f)4, which would allow first year ELLs in high school to take the English language proficiency test in lieu of ELA 10. **(10)**

**RESPONSE:** The Department thanks the commenter for the support.

76. **COMMENT:** The commenter expressed support for the amendments at N.J.A.C. 6A:8-3.1(a)4 and 6A:8-4.1(d)1 that provide clarity regarding accommodations for students with individualized education programs (IEPs) and 504 plans. **(10)**

**RESPONSE:** The Department thanks the commenter for the support.

77. **COMMENT:** The commenter expressed support for the amendments at N.J.A.C. 6A:6A:8-4.3(b) establishing a timeframe for notifying parents and students of assessment results. **(10)**

**RESPONSE:** The Department thanks the commenter for the support.

78. **COMMENT:** The commenter supported the proposed amendments at N.J.A.C. 6A:8-4.3(a) and (b) that will ensure widespread and earlier distribution of State assessment data with school district staff, students, and parents. The commenter stated that educators can respond appropriately to meet each student's needs as soon as performance data is provided. **(19)**

**RESPONSE:** The Department thanks the commenter for the support.

79. **COMMENT:** The commenter supported the amendment at N.J.A.C. 6A:8-4.3(a) that would change the notification period for providing assessment results to district boards of education from 60 days to 45 days. The commenter also suggested that parents should be provided with individual student results within the same timeframe so parents have information about their children's progress as soon as possible. **(9)**

**RESPONSE:** The Department thanks the commenter for the support. N.J.A.C. 6A:8-4.3(a), as originally proposed for amendment, would also provide State assessment data to educators, parents, and students within 45 days of receipt of the information from the Department. The Department has determined the time frame for parents and teachers should be reduced to 30 days of receipt of the information from the Department. Please see Agency-Initiated Change 6 for further details.

80. **COMMENT:** The commenter stated a single high-stakes exam should not be a barrier to successful completion of high school and supported the continuance of the alternative assessments and portfolio appeals process for students who do not pass the high school State assessments. The commenter also stated the portfolio appeals process should recognize the completion of a CTE program, coupled with students earning an industry-recognized credential or passing a required technical skills assessment as sufficient to graduate high school. **(21)**

**RESPONSE:** The Department thanks the commenter for the support.

81. **COMMENT:** The commenters expressed support for the proposed rulemaking as the first step toward a stronger and fairer assessment system. **(3, 19)**

**RESPONSE:** The Department thanks the commenters for the support.

82. **COMMENT:** The commenter expressed support for a future high school graduation assessment that is relevant to students and a sound educational tool that promotes student learning. The commenter stated that PARCC assessments did not provide valuable feedback on learning as intended and could not be used to identify student learning needs, make placement decisions, or develop curricula. (19)

**RESPONSE:** The Department thanks the commenter for the support and agrees with the goal of a New Jersey high school graduation assessment that is relevant to students and serves as a sound educational tool that promotes student learning. The Department agrees that New Jersey's State assessments need to evolve and to strengthen their role as an instructional tool. On the other hand, the Department has worked with countless educators in schools across the State who have used State assessments during the past four years to consider student learning needs, make placement decisions, or guide development of curricula. In the most recent round of outreach, the Department also heard from many educators who utilized the PARCC assessment as one of many tools to garner feedback on their instruction. The Department will continue to gather stakeholder input to ensure that the next generation of State assessments evolves in a way that benefits all New Jersey students.

83. **COMMENT:** The commenter stated that reducing the number and length of State assessments is critical to the smooth operation of schools and will restore valuable instructional time, which will enable educators to work more closely with students and to use local assessments to determine student remediation or enrichment needs. (19)

**RESPONSE:** The Department thanks the commenter for the support.

84. **COMMENT:** The commenter supported the proposed amendments at N.J.A.C. 6A:8-5.1(f) that will continue the menu of options for students beyond the class of 2019. The commenter also supported continuing the current portfolio process as an appropriate mechanism for assessing school district proficiency for graduation purposes as the portfolio appeal is a necessary process for students with disabilities, ELLs, and test-averse students. (19)

**RESPONSE:** The Department thanks the commenter for the support. The Department clarifies that, according to current N.J.A.C. 6A:8-5.1(f), students in the class of 2020 who do not pass Algebra I and/or ELA 10 and who take all applicable end-of-course assessments in which are enrolled, may avail themselves of the portfolio appeals process or achieve a passing score on any assessment on an alternative competency test as determined by the Commissioner.

85. **COMMENT:** The commenter supported proposed N.J.A.C. 6A:8-5.1(f)4, which will allow ELLs to take an English language proficiency test instead of the State ELA 10, because the proposed rule is educationally appropriate and humanistic. The commenter also urged the Department to work toward ensuring that the State Algebra I assessment is available in any language a student needs. The commenter stated first-year ELLs may know the required mathematics concepts but cannot manage the English literacy skills needed to read the instructions, word problems, or open-ended responses, which essentially subjects ELLs to two literacy tests. (19)

**RESPONSE:** The Department thanks the commenter for the support and will take the recommendations for further enhancing the State assessments into consideration.

86. **COMMENT:** The commenter expressed support for the proposal to revise N.J.A.C. 6A:8, stating that the PARCC assessments have negatively impacted instructional time. The commenter stated that the proposal to decrease the number of required tests will reduce the

burden on the students and schools, but a single high-stakes exam should not pose a barrier to successful completion of high school. The commenter suggested providing alternative mechanisms for students who do not pass these exams, such as SATs, ACTs, ASVAB-AFQT, and allowing students greater flexibility in meeting graduation requirements. (21)

**RESPONSE:** The Department thanks the commenter for the support for the proposal, which streamlines the high school assessment requirements. At this time, the Department is not recommending changes to the two State assessments required for graduation (ELA 10 and Algebra I) and in N.J.A.C. 6A:8-5.1(f). The Department is proposing that students in the class of 2021 and beyond who take but do not pass the Algebra I and/or ELA 10 assessments may avail themselves of the portfolio appeals process or achieve a passing score on an alternative competency test as determined by the Commissioner (including the SAT and ASVAB-AFQT). The opportunity to access the alternative pathways currently exists for the classes of 2019 and 2020. The Department looks forward to the next phase of engagement and outreach to continue to collaborate with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

87. **COMMENT:** The commenter urged the future consideration of allowing CTE coursework to count toward high school graduation in some way and giving students who want to concentrate on career preparation more flexibility in meeting non-core course requirements. The commenter also stated the Department should encourage all school districts to make greater use of Option Two and provide clear guidance about how school districts can grant academic credit for inter- and cross-disciplinary experiences that enhance student learning. (21)

**RESPONSE:** The comment is outside the scope of the current rulemaking, but the Department will consider the comments as it works to ensure that every student has a clear path toward post-secondary success.

88. **COMMENT:** The commenter supported the proposed rulemaking, saying it is a step in the right direction to make federally required testing more student centered and developmentally appropriate. The commenter also supported the extension of the alternative assessment option for students graduating in the class of 2020 and beyond. However, the commenter opposed the remaining PARCC assessment requirements. (11)

**RESPONSE:** The Department thanks the commenter for the support. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

89. **COMMENT:** The commenter questioned how the State plans to assess consistency in subject matter content across school districts and ensure that students have learned the academic content related to the four subjects and mastered the knowledge and skills required to pursue higher education or enter the workforce. The commenter stated the business community needs reliable measures of accountability and assurances that students are graduating from high school with the requisite skills and the same level of preparedness across the State. The commenter further suggested that suitable objective, standardized measures be adopted to ensure that all students receive the same course content and are held to the same level of rigor rather than eliminating four high school assessments. (4)

**RESPONSE:** Although State assessment results are one important standardized indicator of student success, there are other indicators the Department, school districts, and the public use to evaluate course content. For instance, Algebra I and Geometry are part of the State minimum

graduation course requirements. Regardless of whether a course has a related State test, school districts must ensure that students are provided with learning experiences that demonstrate they have met or exceeded the expectations of the NJSLs. The Department will continue to monitor and support schools and school districts through both Federal and State accountability systems, (New Jersey's State ESSA Plan and QSAC, respectively) to ensure that all students have access to high-quality instruction. Additionally, New Jersey's publicly available School Performance Reports provides information on hundreds of school and school district factors that includes student participation and achievement on PSATs, SATs ACTs, and Advanced Placement courses. The reports provide the Department, school districts, and the public with additional high school academic information to assess student access to, and performance in, courses that support student learning, particularly in ELA and mathematics.

The Department's proposed elimination of four high school assessments maintains New Jersey's high-quality academic standards and assessment system; immediately remedies a policy affecting students in the class of 2020 and beyond; and eliminates assessments that divert valuable school district resources without providing new data for students, families or educators.

The Department looks forward collaborating with all interested stakeholders in the second phase of engagement to determine next steps for improving the State assessment system.

- 90. COMMENT:** The commenter urged the State Board to consider equity and the diversity of the State's student body, including ELLs and students with disabilities, as the proposed rulemaking advances. **(4)**

**RESPONSE:** The Department remains committed to considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard excellent recommendations for the next-generation assessment, including assessment implementation. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting all types of learners.

- 91. COMMENT:** The commenter urged the State to continue requiring students to take PARCC assessments to comply with ESSA's requirements and New Jersey's ESSA State Plan, which focuses on closing the achievement gap. The commenter noted that use of PARCC will help identify school districts that are not meeting the State standards so that proper resources and support can be allocated to those school districts accordingly. **(5)**

**RESPONSE:** The Department agrees and will continue to follow [New Jersey's State ESSA Plan](#) and to use data to understand where school districts need support. State assessments and other metrics such as academic growth, graduation rates, chronic absenteeism rates, and ELLs' progress toward proficiency continue to be used to identify what schools need additional comprehensive and targeted support. Further, proposed amendments at N.J.A.C. 6A:8-4.1(c) are intended to clarify the Department's commitment to aligning its proposal to Federal law. Please see Agency-Initiated Change 2 and 3 for further details.

- 92. COMMENT:** The commenter expressed concern with the proposed rulemaking because having less data from State assessments will make it more difficult to analyze achievement gaps, find students who are falling behind, and close identified gaps. The commenter also stated that State assessment results presented to the State Board last year showed encouraging trends in student performance the past three years, which indicates students are rising to the challenge of high expectations. The commenter further stated that big achievement gaps, or lack of data showing

students are achieving, has a negative effect on attracting business to New Jersey or retaining current businesses looking for qualified talent. (8)

**RESPONSE:** The Department remains committed to identifying ways to eliminate gaps among student groups in academics and in career and college opportunities. The Department will continue to follow New Jersey's State ESSA Plan and to use data to understand what supports school districts need. Under the Department's proposal, State assessments and other metrics such as academic growth, graduation rates, chronic absenteeism rates, and ELLs' progress toward proficiency will continue to be used to identify what schools need comprehensive and targeted support. New Jersey's State ESSA Plan focuses on student group performance so that historically underrepresented groups are not masked within larger school performance.

Additionally, the Department provided data at the August 1, 2018, State Board meeting demonstrating that the high school assessments in ELA 9 and 11, Geometry, and Algebra II do not provide enough unique or different data to the Department or broader public to warrant the resources necessary to administer the additional assessments.

The Department's proposal relies on a theory that merely gathering data to identify gaps does not inherently improve student performance. Instead, the Department will focus its resources on improving instruction, curriculum, and real-life career opportunities to best prepare students and, therefore, the State's future workforce.

93. **COMMENT:** The commenter questioned why students with testing anxiety are required to take and fail the State assessment to access the portfolio appeals process. The commenter also questioned why students are required to take the State assessment, which higher education institutions do not accept, before accessing SAT or ACT options. The commenter suggested allowing students interested in enlisting in the military to take only the ASVAB-AFQT to meet the graduation requirements. (12)

**RESPONSE:** For continuity of standards for current high school assessment graduation requirements, the Department is not recommending changes to the two State assessments required for graduation (ELA 10 and Algebra I). The State assessments, unlike other nationally recognized standardized assessments, align to the NJSLs. The commenter's recommendation will be considered in the Department's next phase of assessment outreach when it looks forward collaborating with all interested stakeholders to assess whether the current graduation assessment requirements adequately promote student achievement and indicate student preparedness for life after graduation, as well as to determine what types of assessments will best serve New Jersey students moving forward.

94. **COMMENT:** The commenter stated there is much work to be done if the State is serious about strengthening the educational experiences of New Jersey students, families, and educators. The commenter also urged the Department to explore a longer-term and intentional transition to the Innovative Assessment Pilot under ESSA. The commenter stated participation in the pilot would provide opportunities for classroom-based, curriculum-embedded assessment that is grounded in authentic performance and would allow New Jersey educators to further deepen their assessment literacy. (3)

**RESPONSE:** The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

95. **COMMENT:** The commenter stated that students moving from middle school or homeschooling into their first year of high school would benefit from taking the PARCC assessment. The commenter suggested that students should not be required to take another State assessment if they pass the ELA 9 or 10 assessment and further recommended allowing students who do not pass the ELA 10 assessment to retake the ELA assessment in grades 11 or 12 or take an alternative ELA route to graduation. (5)

**RESPONSE:** Under the Department's proposal, students currently enrolled in high school must still take and pass Algebra I and ELA 10, or utilize an alternative pathway, to meet the graduation assessment requirements. The proposed amendments at N.J.A.C. 6A:8-5.1(f)2 capture an interim proposal intended to streamline the high school assessment system as part of the transition to the next State assessment system. Upon review of the graduation requirements for the classes of 2020 and beyond, the Department found aspects of the current rules to be overly complex and to have an unintended negative consequence on some students.

The current rule and the proposed amendments allow students who do not pass the ELA 10 assessments to retake the assessment or meet the graduation assessment requirement through the portfolio appeals process. The Department's proposal would additionally allow students who take the State ELA 10 and Algebra I assessment, but do not pass one or both assessments, to demonstrate proficiency through an alternative standardized assessment pathway (substitute competency assessment), which is currently available to the classes of 2019 and 2020.

96. **COMMENT:** The commenter urged the State to cautiously evaluate the current pathways to graduation, including cut scores and alternative assessments that are less rigorous than current assessments, so a tiered diploma system is not created. (4)

**RESPONSE:** The Department agrees that as New Jersey's assessment system evolves, all assessment pathways to graduation must be carefully evaluated. The Department looks forward to its second phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders on critical questions regarding what types of high school graduation assessment requirements best inform students, educators, and school communities about whether students have mastered the skills and knowledge they need to advance beyond high school.

97. **COMMENT:** The commenter expressed concern that the Department's proposal to eliminate four end-of-course high school assessments (ELA 9 and 11, Geometry, and Algebra II) creates some uncertainty, especially without replacement assessments and without research or data indicating whether the eliminations will increase student achievement or better prepare students for life after graduation. (4)

**RESPONSE:** The Department disagrees that the Department's proposal creates uncertainty. The Department is maintaining compliance with Federal assessment and accountability requirements and is not changing the requirement for high school students to take and pass Algebra I and ELA 10 to meet the graduation assessment requirements. The proposed rulemaking is an interim proposal to streamline the high school assessment system as part of the transition to the next State assessment system. Upon review of the graduation requirements for the classes of 2020 and beyond, the Department found aspects of the current rules to be overly complex and to have an unintended negative consequence on some students, particularly in light of the number of standardized tests administered in high school, including non-state tests such as the PSAT, SAT, ACT, and Advanced Placement.

The Department's proposed elimination of four high school assessments is meant to maintain New Jersey's high-quality academic standards and assessment system; immediately remedy a policy with the potential to negatively affect the class of 2020 and beyond; and eliminate assessments that divert valuable resources without providing actionable data for families or educators.

The Department looks forward to collaborating with all interested stakeholders in its next phase of engagement to assess whether the current graduation assessment requirements adequately promote student achievement and indicate student preparedness for life after graduation and to determine what types of assessments will best serve New Jersey students moving forward.

The commenter's statement presumes existing research or data indicate that the end-of-course high school assessments that the Department will no longer administer to all high school students demonstrate that assessments are solely responsible for increasing student achievement or better preparing students for life after graduation, ignoring all other factors such as instruction and curriculum. Additionally, the Department's proposal is inline with a growing trend of colleges moving away from requiring standardized testing and toward standardized testing as optional admissions criteria (see: [Washington Post article](https://www.washingtonpost.com/news/answer-sheet/wp/2017/04/12/the-list-of-test-optional-colleges-and-universities-keeps-growing-despite-college-boards-latest-jab/?tid=ss_tw-bottom&utm_term=.94b4dc6034b1); full link: [https://www.washingtonpost.com/news/answer-sheet/wp/2017/04/12/the-list-of-test-optional-colleges-and-universities-keeps-growing-despite-college-boards-latest-jab/?tid=ss\\_tw-bottom&utm\\_term=.94b4dc6034b1](https://www.washingtonpost.com/news/answer-sheet/wp/2017/04/12/the-list-of-test-optional-colleges-and-universities-keeps-growing-despite-college-boards-latest-jab/?tid=ss_tw-bottom&utm_term=.94b4dc6034b1)).

98. **COMMENT:** The commenter urged the State Board to provide multiple pathways for students to earn their diplomas, sustain New Jersey's status as having the second-highest high school graduation rate in the nation, and protect the rights and opportunities of all students. The commenter further suggested that the State Board and the Department consider alternative options for assessments used by other states, such as using the SAT or ACT to reduce the overall amount of high school testing, satisfy Federal accountability requirements, and provide a service to students and families. The commenter also urged the State Board and Department to consider using resources such as the ESSA Innovation Pilot or initiatives such as the New York Performance Consortium Schools, which is a network of public schools that serve non-selective student populations and employ creative and challenging assessment practices. **(1)**

**RESPONSE:** The proposed amendments to N.J.A.C. 6A:8 are interim changes meant to continue to provide students access to the current alternative pathways. Throughout the first phase of assessment outreach, the Department listened to New Jersey residents' experiences and concerns regarding the limiting of pathways toward graduation and recommendations for performance-based assessments. The Department also received positive feedback on the State assessment system's alignment to the NJSLS and the Department is committed to continuing to administer standards-based assessments to help ensure that students are making progress toward learning objectives.

The Department looks forward to its second phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders on critical questions regarding what types of high school graduation requirements best inform students, educators, and school communities about whether students have mastered the skills and knowledge they need to advance beyond high school.

99. **COMMENT:** The commenter expressed concern that the proposed graduation requirements do not promote equity for all students because the proposal will create a disparity between students in terms of their educational attainment because some students will graduate from high school

without demonstrating achievement of the rigorous NJSLs. The commenter urged the alignment of a new State assessment or related alternative requirements to the NJSLs. (5)

**RESPONSE:** The proposed rulemaking would extend to the class of 2021 and beyond the alternative assessment options provided for the graduating class of 2019 and prior. Additionally, under N.J.A.C. 6A:8, local assessment of the NJSLs continues to be required. ELA 9, ELA 11, and Geometry courses are mandatory courses aligned with NJSLs. All students must pass these courses to graduate from high school.

- 100. COMMENT:** The commenters expressed concern that there is no data indicating the alternative assessment options demonstrate college, career, and life readiness in the same way as the State's current assessment system. (5, 17)

**RESPONSE:** The proposed rulemaking is an interim proposal to streamline the high school assessment system as part of the transition to the next State assessment system. Upon review of the graduation requirements for the classes of 2020 and beyond, the Department found aspects of the current rules to be overly complex and to have an unintended negative consequence on some students, particularly in light of the number of standardized tests administered in high school, including non-state tests such as the PSAT, SAT, ACT, and Advanced Placement.

The Department's proposed elimination of four high school assessments is meant to maintain and improve New Jersey's high-quality academic standards and assessment system and immediately remedy an unintended consequence of a current policy.

Additionally, under N.J.A.C. 6A:8, local assessment of the NJSLs continues to be required. ELA 9, ELA 11, and Geometry courses are mandatory courses aligned with NJSLs. All students must pass these courses to graduate from high school.

As an alternative means of demonstrating proficiency in ELA 10 and Algebra I, cut scores, as well as the portfolio appeals process and its alignment to the NJSLs will be revisited as part of the second phase of assessment outreach.

- 101. COMMENT:** The commenter expressed concern that the availability of alternative pathways to graduation will become permanent under the proposed rulemaking and it would create a second-tier diploma like the former special review assessment (SRA). The commenter questioned whether the Department will consider a portfolio assessment process that is aligned to ELA 10 and Algebra I standards as a safety net for students who have difficulty demonstrating proficiency on high school State assessments. (17)

**RESPONSE:** The Department's proposed elimination of four high school assessments is meant to maintain and improve New Jersey's high-quality academic standards and assessment system and immediately remedy an unintended consequence of a current policy.

In N.J.A.C. 6A:8-5.1(f), the Department is proposing that students in the class of 2021 and beyond who take but do not pass the Algebra I and/or ELA 10 assessment may achieve a passing score on any assessment on an alternative competency test as determined by the Commissioner or avail themselves of the portfolio appeals process. As an alternative means of demonstrating proficiency in ELA 10 and Algebra I, cut scores, as well as the portfolio appeals process and its alignment to the NJSLs, will be revisited as part of the second phase of assessment outreach.

- 102. COMMENT:** The commenter suggested the Department should not include students who utilize the alternate graduation route in the percentage of students who achieved or exceeded standards in ELA and mathematics when reporting whether New Jersey has met its ESSA State Plan goal of at least 80 percent of students meeting proficiency targets. **(5)**

**RESPONSE:** For the purposes of determining which schools require comprehensive and targeted supports according to New Jersey's State ESSA Plan, proficiency targets are based on the mathematics and ELA assessments a student takes in high school. The substitute competency assessments available to students for graduation purposes according to N.J.A.C. 6A:8-5.1(f) are not used to determine proficiency targets.

- 103. COMMENT:** The commenters stated the proposed amendments to high school graduation requirements do not comply with the current State law. **(1, 6, 10)**

**RESPONSE:** The Department cannot respond to the commenters' legal arguments because the issue raised is the subject of ongoing litigation.

- 104. COMMENT:** The commenter recognized the Department is working toward a solution that will ease stress on students. The commenter called for complete transition away from PARCC and the development of a stronger and fairer State assessment system. **(6)**

**RESPONSE:** The Department thanks the commenter for the support of the transition away from PARCC and the development of the next State assessment system.

- 105. COMMENT:** The commenter supported the Department's current efforts to move away from regulations that would increase reliance on the PARCC assessments and eliminate most alternative options. The commenter also stated the State will have to decide, as part of adopting new assessment policies, whether to spend several years and millions of dollars developing a new graduation assessment or to end the practice of high-stakes testing for high school diplomas like the majority of other states. The commenter further stated the proposed rulemaking is, at best, a short-term measure to diffuse the graduation crisis created by the existing rules. The commenter suggested that more needs to be done to urge the Legislature to reconsider the statutory requirements for a high school graduation assessment, and develop more reliable, student-centered assessment practices. **(1)**

**RESPONSE:** The Department looks forward to its second phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders on critical questions regarding what types of high school graduation requirements best inform students, educators, and school communities about whether students have mastered the skills and knowledge they need to advance beyond high school.

- 106. COMMENT:** The commenter stated the proposed rulemaking provides relief to students in the class of 2020 and beyond. The commenter also stated the next step for advocates is to remove the State law that requires an assessment for graduation. **(10)**

**RESPONSE:** The Department thanks the commenter for the support of the transition away from PARCC and the development of the next State assessment system.

- 107. COMMENT:** The commenter supported the end of PARCC testing in high school because there is no data showing that PARCC is a predictor of future success and high school exit exams do not help students who pass but seem to have a negative effect on students who do not pass. The commenter noted that eliminating four high school assessments would result in cost savings to

the State while still complying with Federal law. The commenter further urged the State Board and the Department to collaborate with other states to create performance-based assessments, eliminate use of exams as a graduation requirement, and work with higher education institutions to create curriculum pathways and appropriate mathematics courses that prepares students for first year college coursework and eliminates the need for remedial Algebra classes. (16)

**RESPONSE:** As an initial step in its transition away from PARCC, the Department proposes to streamline the number of State assessment requirements so that the only assessments required for high school are the graduation assessment requirements (ELA 10 and Algebra I). The Department will soon launch the second phase of its assessment outreach to continue to discuss New Jersey’s transition to the next generation of State assessments. The Department anticipates that discussions during the second phase will particularly focus on high school assessments.

A study conducted by Pearson Education examined PARCC’s college readiness benchmarks, as compared to the benchmarks created by the College Board and ACT. The study examined all six PARCC end-of-course assessments (i.e., Algebra I, Geometry, Algebra 2, and ELA 9, 10, and 11). The researchers concluded, “[o]verall, results indicated that a student meeting the benchmark on the PARCC test had a high probability of making the benchmark on the external test, but the converse did not hold for students meeting the benchmark on the external test, for the majority of comparisons. These results suggest that meeting the PARCC benchmark is an indicator of academic readiness for college.” The [study](https://parcc-assessment.org/wp-content/uploads/2018/07/PARCC-PLS-Longitudinal-Validation-Study-Report-to-PARCC-v3.0.pdf) is available at <https://parcc-assessment.org/wp-content/uploads/2018/07/PARCC-PLS-Longitudinal-Validation-Study-Report-to-PARCC-v3.0.pdf>.

108. **COMMENT:** The commenter stated that district boards of education should be able to establish local graduation requirements aligned with State requirements, while all students who meet local and State graduation requirements should be granted a State-endorsed diploma. The commenter also stated that students with disabilities should be included in State assessments in a way that yields useful data on their growth and measures the effectiveness of their programs. The commenter also stated any methods used to assess whether students have met State and Federal standards must be reliable and accurate, measure appropriate skills, and provide information that is useful in identifying areas in need of remediation. (22)

**RESPONSE:** During the first phase of outreach, the Department received positive feedback on the assessment system’s alignment to State standards and the Department is committed to continuing to administer standards-based assessments to help ensure that students are making progress toward learning objectives. School districts set graduation requirements in alignment with State law and N.J.A.C. 6A:8. As the Department is transitioning to the next-generation State assessment system, the Department is committed to ensuring that students with diverse needs have assessments that provide actionable data and are provided the necessary accommodations identified in their IEPs and 504 plans so students have the tools necessary to be successful and show their growth on the skills being assessed. The Department looks forward to its second phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders on critical questions regarding what types of high school graduation requirements best inform students, educators, and school communities about whether students have mastered the skills and knowledge they need to advance beyond high school.

109. **COMMENT:** The commenter stated the report capturing the feedback from more than 230 people who participated in four NJEA assessment outreach sessions that were held in conjunction with the Department provided evidence that there are significant flaws in the design, delivery, data reporting, and overall utility of the PARCC assessment. The commenter also notes the turnaround time for PARCC results is too long. (6)

**RESPONSE:** The Department is in the process of transitioning to the next generation of State assessment system. During the first phase of assessment outreach, the Department listened to New Jersey residents' experiences with the technical and perceptual issues surrounding the PARCC assessment. The Department recorded the concerns mentioned by the commenter along with support for various aspects of the current assessment system, such as high-quality data and questions that required critical, real-world thinking.

The Department agrees school districts have not always issued reports to teachers and parents in a timely fashion. In response to this delay, the Department has proposed amendments at N.J.A.C. 6A:8-4.3(a) and (b) to ensure parents and teachers receive results 30 days from when the final reports are provided to school districts. The Department looks forward to the next phase of engagement and outreach to continue its collaboration with stakeholders to determine what information and reporting structures are most useful for students, parents, teachers, leaders and community members. Feedback collected from all phases of outreach will inform how the Department continues to improve its State assessment system during the next two or three years as New Jersey develops its next generation of State assessments.

- 110. COMMENT:** The commenter also stated that PARCC has placed a strain on the curriculum in schools and has created unnecessary stress for students. **(6)**

**RESPONSE:** The Department's proposal to streamline the high school assessment component allows the State and school districts to divert valuable resources to remediation and instructional practices for all students, but particularly for struggling students.

- 111. COMMENT:** The commenter stated that assessments need to take into consideration the accommodations for students with disabilities and ELLs. **(6)**

**RESPONSE:** As the Department is transitioning to the next generation of its State assessment system, the Department is committed to ensuring students with diverse needs have assessments that provide actionable data and students are provided the accommodations as required by their IEPs. The Department looks forward to collaborating with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

- 112. COMMENT:** The commenter stated that the Department's assessment outreach sessions revealed significant stakeholder concerns with the PARCC assessment, including design and data reporting, impact on curriculum and instruction, utilization of the assessment as part of graduation requirements and teacher evaluations, mental health implications for students, and the need to serve and properly support all students. **(3)**

**RESPONSE:** During the first phase of assessment outreach, the Department listened to educators, students, parents, and broader community members share their experiences, concerns and questions regarding the PARCC assessment. The Department recorded the concerns along with support for various aspects of the current assessment system. The Department looks forward to the next phase of engagement and outreach to continue its collaboration with stakeholders and the public to determine what type(s) of assessments will best serve New Jersey students moving forward.

- 113. COMMENT:** The commenter stated the State assessments still will take up to six hours of class time each year even with the Department's proposed reduction in testing time. The commenter also stated that nearly two weeks of a school's routine still will be disrupted given the need to administer make-up assessments. The commenter suggested the Department reduce testing time

by at least half for elementary and middle school levels since New Jersey as one of the longest times for State assessment testing. (12)

**RESPONSE:** While the comment is outside the scope of the current rulemaking, adjustments to the testing times for school year 2018-2019 are described in the Department's [Summary of Findings, Recommendations of Next Steps](#) from its first phase of outreach. The Department looks forward to its second phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders regarding various aspects of the next generation of assessments, including testing times and format.

114. **COMMENT:** The commenter stated that the use of PARCC scores in educator evaluations places a level of stress on effected teachers that is detrimental to students. The commenter stated that the weight of State assessment scores in educator evaluations needs to be greatly decreased or eliminated so educators have more time to address social emotional learning, which is critical if students are to be career ready upon leaving high school. (12)

**RESPONSE:** The comment is outside the scope of the current rulemaking. Educator evaluations and their required components are governed by N.J.A.C. 6A:10.

115. **COMMENT:** The commenter recommended that any changes to N.J.A.C. 6A:8 be clearly communicated to everyone in the education community. The commenter also stated that district boards of education and the communities they represent must have ample notice to implement the changes and to assess their fiscal and programmatic impacts. The commenter stated notification is especially important because the proposed rulemaking will be implemented in the current academic year in which school districts' budgets and programs already have been determined. (22)

**RESPONSE:** The Department agrees that clearly communicating all proposed and final amendments to N.J.A.C. 6A:8 is important.

116. **COMMENT:** The commenter questioned whether the proposed rulemaking will have a negative fiscal impact on district boards of education. (22)

**RESPONSE:** The Department maintains the economic impact of the proposed amendments will be positive because they will free up State and school district resources currently spent on administering the multiple assessments that will no longer be administered to every student.

117. **COMMENT:** The commenter stated it is understandable that the State assessment system needs to evolve and expressed concern that the first step is being done in an expedited manner that does not allow for careful consideration of how the changes may affect the State's most challenged students. The commenter called for a careful and deliberate process to revise the State assessment system. (8)

**RESPONSE:** The Department is not proposing changes to the graduation assessment requirements (ELA 10 and Algebra I) or the administration of the State assessment in mathematics and ELA in grades three through eight. The Department's proposed amendments to streamline assessment requirements in high school are meant to remedy policies that have a negative impact on current high school students.

The Department's next phase of outreach, beginning in fall 2018, will elicit stakeholders' key priorities for New Jersey's next State assessment. The transition toward the next generation of assessment has already begun but the full transition will take two to three years.

- 118. COMMENT:** The commenter stated that computerized testing is discriminatory toward low-income students and communities due to the lack of access to technological resources. The commenter also stated that computerized testing and its required keyboarding skills are developmentally inappropriate for young students and, therefore, the Department should provide paper testing as an option. The commenter also suggested the State provide disadvantaged students with technology if for a paper testing option is not provided. **(11)**

**RESPONSE:** Throughout this first phase of assessment outreach, the Department heard from individuals both in favor of technology-based assessments and opposed to it. Technology-based State assessments align with the NJSLs, which describe what students need to know across core content areas including mathematics and ELA, as well as the skills and knowledge that cut across content areas such as technology, life skills, and career readiness. Technology-based assessments are becoming the norm in state assessment programs nationwide. In fact, the SAT and ACT are currently developing computer-based assessments. When New Jersey first administered a technology-based assessment in 2015, 99.4 percent of students successfully completed the assessment using a computer. The technology and infrastructure in school districts around the State has improved since 2015 and student accessibility to devices and technology has grown significantly. To help provide equitable access to technology across the State, the Department will continue to offer technical support and will work to ensure all school districts are equipped with the level of technology necessary to support learning in the 21<sup>st</sup> century.

- 119. COMMENT:** The commenter noted that computer-based assessments are not a suitable testing method for students. **(6)**

**RESPONSE:** Throughout this first phase of assessment outreach, the Department heard from individuals both in favor of and opposed to technology-based assessments. Technology-based State assessments align with the NJSLs, which describe what students need to know across core content areas including mathematics and ELA, as well as the skills and knowledge that cut across content areas such as technology, life skills, and career readiness. Technology-based assessments are becoming the norm in state assessment programs nationwide. To help provide equitable access to technology across the State, the Department will continue to offer technical support and will work to ensure all school districts are equipped with the level of technology necessary to support learning in the 21<sup>st</sup> century.

- 120. COMMENT:** The commenter suggested moving the time period for administering State assessments from April to May or early June so they truly are end-of-course tests and students have ample time to learn and master the material tested. **(11)**

**RESPONSE:** The Department heard divergent feedback regarding the timeframe for assessment administration in the first phase of assessment outreach and, therefore, needs to engage with stakeholders during the second phase of assessment outreach this fall to address the best time at which to administer State assessments to students.

- 121. COMMENT:** The commenter stated the high school exit exam should be eliminated. The commenter also stated flexibility in testing options must be offered if Algebra I, which is offered as early as grade seven, is retained as the State's high school graduation assessment. The commenter stated that students in grade seven should not be burdened with taking an assessment to prove they are qualified to graduate from high school. **(11)**

**RESPONSE:** The Department views Algebra I as a key course that teaches skills required for students to successfully progress to higher level mathematics courses and to demonstrate the

skills necessary to succeed after high school graduation. The Department also realizes that students grasp algebraic concepts at different grade levels and the Department wants students to take the assessment based on when they are taking the course.

- 122. COMMENT:** The commenter stated that students in New Jersey are testing beyond the Federal requirements, resulting in loss of valuable instructional time. The commenter cited a Mathematica Policy Research study, PARCC assessments are less than 10 percent effective in determining college readiness and there is no correlation between PARCC assessments and teacher effectiveness. **(13)**

**RESPONSE:** Federal law requires testing of students every year in grades three through eight and once in high school for ELA and mathematics. New Jersey currently matches the Federal requirement in grades three through eight and exceeds the minimum number of assessments required for Federal accountability in high school. The proposed rulemaking will align the State assessment system with the minimum Federal requirements at the high school level. According to the Mathematica Policy Research study on How PARCC Predicts College Readiness ([study](#)), PARCC and the Massachusetts Comprehensive Assessment System (MCAS) scores have similar ability to predict college grades, comparable to the predictive ability of SAT scores.

The comment regarding teacher effectiveness is outside the scope of the current rulemaking. Educator evaluations and their required components are governed by N.J.A.C. 6A:10.

- 123. COMMENT:** The commenter expressed concern with the use of technology in administering assessments because students without access to technology are at a disadvantage. The commenter also stated that racial and economic disparities are reflected in the assessment results, and urged the State Board to carefully consider the use of technology in testing procedures. **(2)**

**RESPONSE:** Throughout this first phase of assessment outreach, the Department heard from individuals both in favor of technology-based assessments and opposed to it. Technology-based State assessments align with the NJSLs, which describe what students need to know across core content areas including mathematics and ELA, as well as the skills and knowledge that cut across content areas such as technology, life skills, and career readiness. Technology-based assessments are becoming the norm in state assessment programs nationwide. In fact, the SAT and ACT are currently developing computer-based assessments. When New Jersey first administered a technology-based assessment in 2015, 99.4 percent of students successfully completed the assessment using a computer. The technology and infrastructure in school districts around the State has improved since 2015 and student accessibility to devices and technology has grown significantly. To help provide equitable access to technology across the State, the Department will continue to offer technical support and will work to ensure all school districts are equipped with the level of technology necessary to support learning in the 21<sup>st</sup> century.

- 124. COMMENT:** The commenters opposed the adoption of the proposed rulemaking because the changes are unsupported by achievement data and educational evidence, which play a significant role when reviewing the State assessment system. **(8, 17)**

**RESPONSE:** At the August 1, 2018, State Board meeting, the Department provided achievement data demonstrating that the high school assessments the Department is proposing to eliminate do not provide enough unique or different data to warrant the resources necessary to administer four tests beyond the minimum Federal accountability requirements (one mathematics and one ELA assessment in high school). Additionally, performance data and information from thousands of students, parents, and educators informed the Department's understanding that the

misalignment among what a student perceives is required to be prepared for college and career and the State assessments has led to less informative data at the high school level when compared to high school performance. This misalignment has led to less informative data at the high school level.

- 125. COMMENT:** The commenter stated the proposed decrease in the number of high school State assessments will decrease access to data at critical points of a student's education and will restrict data to the point where the performance of student subgroups compared to their peers may not be accurately tracked. The commenter further stated PARCC and the data collected are an integral part in making sure the educational needs of students across the State. The commenter acknowledged the high rate of students who have not passed the ELA 10 and Algebra I assessments and must take four other assessments to access the alternative options. The commenter suggested that waivers or other allowances be made for students in that situation rather than eliminating the ELA 11, Geometry, and Algebra II assessments. The commenter also urged the Department to explain why many students are struggling to pass basic courses like ELA 10 and Algebra I and the plan to raise outcomes. **(17)**

**RESPONSE:** At this time, the Department's proposal does not change the two State assessments required for graduation (Algebra I and ELA 10). The proposed amendments would extend the assessment options to the graduating class of 2020 and beyond. The Department provided at the August 1, 2018, State Board meeting data demonstrating that the high school assessments in ELA 9 and 11, Geometry, and Algebra II do not provide enough unique or different data to the Department or broader public to warrant the resources necessary to administer the additional assessments. Accordingly, the Department will continue to have sufficient data to review to carry out its responsibility and to identify what schools and school districts require additional supports to better serve its students.

New Jersey's measures of Federal, State, and public accountability remain strongly intact and the State ESSA Plan and QSAC require the Department to review performance measures, including proficiency, growth, graduation rates, and chronic absenteeism rates, for the State's more than 2,500 schools and 600 school districts. New Jersey's State ESSA Plan focuses on student group performance, by equally weighing subgroup performance and whole school averages so historically underrepresented student groups are not masked within the performance of the larger school population. Through School Performance Reports, parents continue to have public access to have hundreds of data points regarding the opportunities provided at each high school across the State.

- 126. COMMENT:** The commenter urged the State to ensure any new assessment system allows for the continued longitudinal comparison of assessment results to examine whether all students are meeting the NJSLs' high expectations. **(8)**

**RESPONSE:** The Department looks forward to its second phase of assessment outreach and engagement during which the Department will collect input from education stakeholders on critical questions regarding what types of high school graduation requirements best inform students, educators, and school communities about whether students have mastered the skills and knowledge they need to advance beyond high school.

- 127. COMMENT:** The commenter stated that objective data and research would either support or refute the opinions expressed during the Department's assessment outreach in the spring. **(4)**

**RESPONSE:** During the first phase of assessment outreach, the Department appreciated the opportunity to meet with more than 2,300 people and to digest 3,258 comments in response to

the question: “What improvements would you like to see for the next generation of State assessments in New Jersey?” As a broad, initial listening tour, the Department heard and summarized in its report about the experiences and perceptions from a variety of stakeholders such as educators administering the assessment, students taking the assessments, parents, users of the assessment reports, etc. This input helped inform the Department’s process for transitioning away from PARCC and to the next generation of assessments. The Department’s interim regulatory proposals are first meant to remedy policies that streamline high school assessment requirements and have an unintended negative impact on current high school students.

At the August 1, 2018, State Board meeting, the Department provided achievement data demonstrating that the high school assessments the Department is proposing to eliminate do not provide enough unique or different data to warrant the resources necessary to administer four tests beyond the minimum Federal accountability requirements (one mathematics and one ELA assessment in high school). Additionally, performance data and information from thousands of students, parents, and educators informed the Department’s understanding that the misalignment among what a student perceives is required to be prepared for college and career and the State assessments has led to less informative data at the high school when compared to high school performance.

- 128. COMMENT:** The commenter suggested that the Department at N.J.A.C. 6A:8-1.3 define “district board of education” to mean providers of publicly funded elementary, secondary, and adult high school education programs, including charter schools and approved private schools for students with disabilities (APSSDs). The commenter also suggested amendments to the definition for “chief school administrator” to include charter school lead persons and directors of APSSDs. The commenter stated the new and amended definitions will clarify that the chapter applies to all aforementioned entities. **(22)**

**RESPONSE:** A definition of “district board of education” at N.J.A.C. 6A:8-1.3 is not necessary because N.J.A.C. 6A:8-1.2(b) currently states: “Unless otherwise noted, “district boards of education” shall be interpreted throughout this chapter to include the governing authorities of all providers of publicly funded elementary, secondary, and adult high school education programs, including county vocational school districts; educational services commissions; jointure commissions; charter schools; alternative schools; regional day schools; adult high schools; county special services school districts; the Marie H. Katzenbach School for the Deaf; the Department of Human Services; the Department of Children and Families; the Department of Corrections; the Juvenile Justice Commission; public college-operated programs; and approved private schools for the disabled.”

The Department will take the other suggestion into consideration as part of a future rulemaking.

- 129. COMMENT:** The commenter recommended amendments to N.J.A.C. 6A:8-3.1(c), which requires district boards of education to provide the time and resources to develop, review, and enhance inter-disciplinary connections, supportive curricula, and instructional tools for helping students acquire required knowledge and skills. The commenter suggested that the rule reference where the list of 21<sup>st</sup> century themes and skills can be found. The commenter also recommended that “time” be deleted because instructional time is subject to negotiations and best determined at the school district level. **(22)**

**RESPONSE:** The comment is outside the scope of the current rulemaking. The Department will take the suggestion into consideration as part of a future rulemaking.

- 130. COMMENT:** The commenter recommended amendments at N.J.A.C. 6A:8-4.1(d), which addresses administration of State assessments to students with disabilities, to permit IEP teams to determine whether each student takes the general education assessment or an alternative assessment based on the student’s developmental and pedagogical progress, as opposed to testing students with disabilities according to their chronological grade level. The commenter stated the current alternative State assessment – Dynamic Learning Maps – has strict eligibility criteria and students who do not meet the criteria must take the State assessment associated with their grade level. **(22)**

**RESPONSE:** Federal law allows New Jersey to use an alternative assessment for only one percent of the student population. All other students are required to take an assessment at their current grade level, according to Federal law. The eligibility criteria for the Dynamic Learning Maps assessment are in alignment with the Federal law cited below.

Section 1111(b)(2)(B)(ii) of ESSA mandates that State assessments must “be aligned with the challenging State academic standards, and provide coherent and timely information about student attainment of such standards and whether the student is performing at the student’s grade level.” States may develop alternate academic achievement standards for students with the most significant cognitive disabilities that are aligned to challenging State academic standards in alignment with Section 1111(b)(1)(E)(i) of ESSA, but the total number of students assessed using these alternative assessments cannot exceed one percent of the total number of all students in the State who are assessed in such subject (see: Section 1111(b)(2)(D)(i)(I) of ESSA).

- 131. COMMENT:** The commenter suggested that N.J.A.C. 6A:8-4.2(e), which places the responsibility for the security of State assessments on district boards of education, should be amended to reflect that the security responsibilities are in accordance with the Commissioner’s and testing vendor’s directives. **(22)**

**RESPONSE:** The comment is outside the scope of the current rulemaking. The Department will take the suggestion into consideration as part of a future rulemaking.

- 132. COMMENT:** The commenter suggested that N.J.A.C. 6A:8-4.3(a) and (b) both discuss the release of State assessment data and should be merged or clarified so the distinctions are clear. **(22)**

**RESPONSE:** As N.J.A.C. 6A:8-4.3(a) references the release of “final results of annual assessments” and N.J.A.C. 6A:8-4.3(b) references the “results of annual assessments,” the Department will not combine the rules at this time. However, through the Agency-Initiated Changes further in this document and through guidance issued at the times of the Statewide release, the Department will clarify the expectations and analyze whether further clarification is warranted. After this analysis, the Department will take the commenter’s recommendation into consideration. Please see Agency-Initiated Changes 6 and 7 for an additional Proposal Level amendment to N.J.A.C. 6A:8-4.3(a).

- 133. COMMENT:** The commenter suggested that the Department add “at a public meeting” to N.J.A.C. 6A:8-4.3(a) to clarify the reporting requirement. **(22)**

**RESPONSE:** The Department thanks the commenter for the suggestion to further amend N.J.A.C. 6A:8-4.3(a), which requires chief school administrators to report annual assessment results to district boards of education and, as proposed for amendment, to members of the public. The Department agrees that adding “at a public meeting” will clarify the chief school

administrator's responsibilities pertaining to the reporting requirements. The proposed amendment is as follows:

- (a) Chief school administrators shall report [preliminary and] final results of annual assessments to district boards of education **and members of the public at a public meeting** within [60] 45 days of receipt of information from the Department.

Please see Agency-Initiated Change 5 for an additional Proposal Level amendment to N.J.A.C. 6A:8-4.3(a).

- 134. COMMENT:** The commenter questioned whether NJSLS will be updated at the same time as the proposed rulemaking since N.J.A.C. 6A:8-5.1 and other provisions throughout the proposal reference the NJSLS. If the NJSLS will be updated along with the proposed rulemaking, the commenter recommended the inclusion in the standards of new statutory requirements for instruction on the consequences of distributing and soliciting sexually explicit images and updates to driver education. **(22)**

**RESPONSE:** Pursuant to N.J.A.C. 6A:8-2.1, the NJSLS are subject to review and re-adoption every five years. As the last re-adoption occurred in 2014, the NJSLS are scheduled to be reviewed and readopted in 2019.

- 135. COMMENT:** The commenter stated that N.J.A.C. 6A:8-5.1(f) proposes that students who do not demonstrate proficiency on the State ELA 10 and Algebra I assessments will be given the opportunity to retake the assessment(s) and to demonstrate competency through an alternative means. The commenter questioned whether the Department intended to use “or” as opposed to the current use of “and” in relation to the opportunities. The commenter stated the alternative means are unnecessary if a student is able to demonstrate proficiency when the assessment is retaken. The commenter also questioned how many opportunities a student will be provided to demonstrate proficiency. **(22)**

**RESPONSE:** The Department intended to use “and” in N.J.A.C. 6A:8-5.1(f) because a student who does not pass the Algebra I and/or ELA 10 assessment may choose to retake the assessment but might not pass it. Therefore, the student has the opportunity to retake and to demonstrate competency through an alternative means.

- 136. COMMENT:** The commenters stated the proposed rulemaking would make recommended changes to the State's assessment system, which is a matter of great importance. Therefore, the commenters recommended delaying public testimony on the proposed rulemaking to September 12, 2018, rather than the scheduled August 1, 2018, meeting. The commenters also stated convening this important conversation in September when school districts are in session and families are not traveling would ensure that all interested stakeholders have adequate notice and a fair opportunity to deliver oral testimony before State Board members. The commenters further requested that the State Board follow all procedural steps and examine the proposed rulemaking at each level of discussion and not use an expedited process since the rulemaking concerns longstanding educational policy. **(4, 17, 23, 24, 25)**

**RESPONSE:** As the September 12, 2018, State Board public testimony session is designated as open topic – meaning people testifying can speak about any educational topic of their choice, including the proposed amendments to N.J.A.C. 6A:8 – holding the Second Discussion Level public testimony session on August 1, 2018, provided two consecutive opportunities for the public to speak to the State Board about the proposed rulemaking without altering the normal course of the State Board's regulatory review process. If approved by the State Board at Proposal

Level, the public will have an additional opportunity to testify about the proposed rulemaking after it is published in the New Jersey Register. The State Board has considered the proposed rulemaking at First and Second Discussion levels and is scheduled to review it at Proposal Level at the September 12, 2018, meeting, which are the normal steps in the State Board's regulatory review process.

## AGENCY-INITIATED CHANGES

1. The Department proposes to amend two definitions in N.J.A.C. 6A:8-1.3 to spell out "English language arts (ELA)" and "Armed Services Vocational Aptitude Battery- Armed Forces Qualifying Test (ASVAB-AFQT)." The proposed amendment is as follows:

"Portfolio appeals process" means an alternative assessment of proficiency for graduation established by the Commissioner, utilizing techniques and instruments other than PARCC **English language arts (ELA) 10 or Algebra I assessments, or the State ELA 10 and Algebra I assessments**, or substitute competency tests.

"Substitute competency test" means an alternative set of third-party assessments approved by the Commissioner, including, but not limited to the SAT, PSAT, ACT, ACT-Aspire, **Armed Services Vocational Aptitude Battery - Armed Forces Qualifying Test (ASVAB-AFQT)**, or Accuplacer, that can be used to demonstrate competency in the NJSLS for students who have not demonstrated proficiency on PARCC **ELA 10 or Algebra I assessments, or the State ELA 10 or Algebra I assessments**.

2. The Department proposes an amendment at N.J.A.C. 6A:8-4.1(c) to replace the originally proposed "State English language arts (ELA) 10 and Algebra I assessments" with "high school assessment component." The use of "high school assessment component" aligns to the school-level descriptions (elementary and middle school) used in the N.J.A.C. 6A:8-4.1. "High school assessment component" includes one ELA, one mathematics, and one science assessment. The proposed amendment is as follows:

(c) District boards of education shall, according to a schedule prescribed by the Commissioner, administer the applicable Statewide assessments, including the following major components: the elementary assessment component for grades three through five; the middle school assessment component for grades six through eight, the [high school end-of-course PARCC] [**State English language arts (ELA) 10 and Algebra I assessments**] **high school assessment component**, and the alternative **State** assessment for students with disabilities and provide notification to each student entering grades three through 12 of the Statewide assessment schedule.

3. The Department proposes to amend N.J.A.C. 6A:8-4.1(c)3, which requires the implementation of a high school assessment program component of the NJSLS that assesses, at a minimum, ELA, mathematics, and science, to delete "program" and to add "Statewide assessment of the" before "NJSLS." The Department also proposes to replace "that assesses, at a minimum," with "consisting of one assessment in each of the following subjects." The Department also proposes to recodify "English language arts, mathematics, and science" as N.J.A.C. 6A:8-4.1(c)3i, ii, and iii. The proposed amendments will mirror the language and structure of the elementary and middle school components of the Statewide assessment at N.J.A.C. 6A:8-4.1(c)1 and 2.

The rule, as proposed for amendment, will also align with the Federal assessment requirements in Section 1111(B)(v) of the ESEA. The ESEA requires school districts to

administer to high school students one assessment in each of the following subjects: ELA, mathematics, and science. Section 1111(C) of the ESEA provides that for school accountability, a student who takes an assessment such as Algebra I in middle school must take one mathematics end-of-course assessment in high school that is more advanced than the assessment taken in middle school. For example, students who take Algebra I in middle school must be administered a more advanced assessment such as Geometry in high school for the purposes of measuring school and school district performance and meeting Federal requirements. The proposed amendments at N.J.A.C. 6A:8-4.1(c)3 are as follows:

3. The Department shall implement a high school assessment [[program]] component of the **Statewide assessment of the** NJSLS [[that assesses, at a minimum,]] **consisting of one assessment in each of the following subjects:**
  - i. English language arts[[,]];
  - ii. [[mathematics,]] **Mathematics;** and
  - iii. [[science]] **Science.** [with the exception of the following:
    - i. Students may receive a waiver from the district board of education from taking the high school end-of-course PARCC assessment in ELA 11 due to the student's participation in another English language/literature college placement assessment during the same school year.]

4. The Department proposes to recodify proposed N.J.A.C. 6A:8-5.1(f)4, which will exempt first-year English language learners (ELLs) who substitute a Department-approved English language proficiency test for the State ELA 10 assessment from the State ELA graduation assessment requirement, as N.J.A.C. 6A:8-4.1(d)1ii(1). The purpose of the recodification is to separate this exception from the alternative pathways students who do not pass ELA 10 or Algebra I may access to meet the State assessment graduation requirements. The proposed recodification and technical amendment are as follows:

**(1) First-year ELLs who substitute a Department-approved English language proficiency test for the State ELA 10 assessment in accordance with [[N.J.A.C. 6A:8-4.1(d)1ii]] (d)1ii above are not required to take the State ELA 10 assessment.**

5. The Department proposes to amend N.J.A.C. 6A:8-4.3(a), which currently requires chief school administrators to report preliminary and final results of annual assessments to district boards of education within 60 days of receipt of information from the Department. The Department originally proposed to amend the rule to require the information to be provided within 45 days of receipt of information. The Department now proposes to amend the requirement back to the current 60 days. 60 days provides at least two months for chief school administrators to report aggregate school and district assessment results at a public school board meeting, which typically occur monthly. Upon further analysis of district board of education meeting schedules, 45 days would have limited chief school administrators' options for presenting the data to district boards of education and the public. The proposed amendment is as follows:

- (a) Chief school administrators shall report [preliminary and] final results of annual assessments to district boards of education **and members of the public at a public meeting** within [60] [[45]] **60** days of receipt of information from the Department.

6. The Department proposes to amend N.J.A.C. 6A:8-4.3(b), which currently requires district boards of education to provide parents, students, and citizens with the results of annual assessments. The Department originally proposed to amend the rule to require chief school administrators, rather than district boards of education, to provide educators, parents, and

students with annual assessment results in accordance with N.J.A.C. 6A:8-4.2(a), as applicable, within 45 days of receipt of the information from the Department. The Department proposes to replace “in accordance with” with “as required in” and to delete “as applicable.” The Department also proposes to reduce the proposed reporting timeline from 45 days to 30 days. The proposed amendment will ensure that educators, parents, and students receive results, such as student-level assessment reports or classroom data reports, in a timely manner. Upon further analysis, the Department determined 45 days is too long for educators and parents to wait for student-level assessment results. The proposed amendments are as follows:

- (b) [District boards of education] **Chief school administrators** shall provide **educators, parents, and students**[, and citizens] with the results of annual assessments [according to] **[[in accordance with]] as required in** N.J.A.C. 6A:8-4.2(a), **[[as applicable,]] within [[45]] 30 days of receipt of information from the Department.**

7. The Department proposes to amend N.J.A.C. 6A:8-5.1(a)6, which currently requires district board of education graduation policies to include the requirement that all students demonstrate proficiency in assessments in ELA 10 and Algebra I or through the alternative means set forth at N.J.A.C. 6A:8-5.1(f) through (h). The Department previously proposed to add “including State ELA 10 and State Algebra I,” after “ELA 10 and Algebra I.” At Proposal Level, the Department further proposes to replace “including” with “such as” as a technical clarification. The rule references State ELA and mathematics assessments and not a subset of a broader group of assessments. The Department proposes the same amendment at N.J.A.C. 6A:8-5.1(a)7. The proposed amendment is as follows:

- 6. The requirement that all students demonstrate proficiency [in the high school end-of-course PARCC] **by:**
  - i. **Achieving a passing score on** assessments in ELA 10 and Algebra I, **[[including]] such as State ELA 10 and State Algebra I;** or [through]
  - ii. **Through** the alternative means set forth at (f) through [(i)] **(h)** below;
- 7. Students graduating from an adult high school shall demonstrate proficiency in [the high school end-of-course PARCC] assessments in ELA 10 and Algebra I, **[[including the]] such as State ELA and State Algebra I,** or through the alternative means set forth at (f) through [(i)] **(h)** below.

8. The Department proposes to amend N.J.A.C. 6A:8-5.1(f)2, which currently allows students in the class of 2020 who take all end-of-course assessments for classes in which they are enrolled to use the alternative means if they do not pass the ELA 10 and Algebra I assessments. The Department originally proposed amendments that would require students in the class of 2020 and beyond who have completed coursework in Algebra I and/or ELA grade10 that culminates in a New Jersey public school awarding credit for mastery of the corresponding New Jersey Student Learning Standards (NJSLS) to take the ELA 10 and Algebra I assessments and to use the alternative means if the students do not achieve a passing score on the requisite assessments.. The Department at Proposal Level proposes to replace “that culminates” with “aligned to the NJSLS” and to delete “awarding credit for mastery of the corresponding NJSLS.” The Department was made aware that the proposed language seemed to indicate that students could no longer take an Algebra I course in middle school because it would not lead to the awarding of credit. However, the proposed amendments are meant to allow middle school students who take and pass the State Algebra I assessment prior to high school to meet the mathematics assessment graduation requirement as described in N.J.A.C. 6A:8-5.1(a)6. The proposed amendments are as follows:

2. For the graduating [class] **classes of 2020 and beyond, all students who have completed coursework in Algebra I and/or ELA grade 10 [[that culminates] aligned to the NJSLs in a New Jersey public school [[awarding credit for mastery of the corresponding NJSLs]] shall take [all applicable high school end-of-course PARCC assessments for all courses in which they are enrolled, including those students who received a waiver for ELA 11 pursuant to N.J.A.C. 6A:8-4.1(c)3i, as of September 6, 2016, and thereafter, but] the requisite assessments in ELA 10 and Algebra I in furtherance of meeting the requirements of (a)6i above. Students who do not achieve a passing score on one or both of the [ELA 10 and Algebra I end-of-course PARCC] requisite assessments pursuant to (a)6i above, may satisfy the State requirement to demonstrate proficiency in English language arts and/or mathematics in one of the following ways:**
  - i. Achieve a passing score, as determined by the Commissioner, on a corresponding substitute competency test in English language arts and/or mathematics, as applicable[, or substitute a passing score on another end-of-course PARCC assessment, including ELA 9, ELA 11, Geometry, or Algebra II]; or
  - ii. Meet the criteria of the portfolio appeals process.
9. The Department proposes to amend proposed N.J.A.C. 6A:8-5.1(f)3ii, which allows students in the graduating class of 2019 and beyond to use a passing score, as determined by the Commissioner, on a corresponding substitute competency test in ELA and/or mathematics, as applicable, to meet the State high school assessment requirements in ELA and/or mathematics. The Department proposes at Proposal Level to add “as determined by the Commissioner” after “corresponding substitute competency test” to specify the acceptable competency tests are determined by the Commissioner.
  3. **For the graduating classes of 2019 and beyond, students who completed the required coursework at a school that did not offer assessments allowing the student the opportunity to satisfy (a)6i above shall satisfy the State requirement to demonstrate proficiency in ELA and/or mathematics in one of the following ways:**
    - i. **Take and achieve a passing score on the State ELA 10 and Algebra I; or**
    - ii. **Achieve a passing score, as determined by the Commissioner, on a corresponding substitute competency test, as determined by the Commissioner, in ELA and/or mathematics, as applicable; or**
    - iii. **Meet the criteria of the portfolio appeals process.**
10. The Department proposes to amend recodified N.J.A.C. 6A:8-5.1(h), which currently states students with disabilities or eligible under Section 504 of the Rehabilitation Act who participate in the alternative assessment for students with disabilities are not required to participate in repeated administrations of high school end-of-course PARCC assessments. The Department originally proposed an amendment to replace “high school end-of-course PARCC assessments” with “the State ELA 10 or Algebra I assessments.” The Department proposes at Proposal Level to replace “the State ELA 10 or Algebra I assessments” with “high school assessment components required in N.J.A.C. 6A:8-4.1(c)” to mirror the new amendments proposed in N.J.A.C. 6A:8-4.1(c).
  - (i) **(h)** Students with disabilities as defined in N.J.A.C. 6A:14-1.3 or eligible under Section 504 of the Rehabilitation Act who participate in the alternative assessment for students with disabilities are not required to participate in repeated administrations of

*Note: The following are comments made at the September 12, 2018, State Board meeting or new comments not previously made public as part of the agenda materials for the State Board's September 12, 2018, meeting.*

- 137. COMMENT:** The commenter stated that the State Board is not looking at only standardized assessment to assess student achievement or school district performance. The commenter stated that Partnership for Assessment of Readiness for College and Careers (PARCC) assessments provide only a snapshot of a student's performance, but the State assessments are nevertheless another piece of information that allows assessment of student performance. **(A)**

**RESPONSE:** The Department maintains that the proposed amendments preserve the high standards and robust State and Federal accountability systems. Using a systems approach to continuous improvement, the Department has proposed targeted amendments to N.J.A.C. 6A:8 that maintain New Jersey's high expectations for and accountability to all students, provide actionable data to communities, and focus on graduation assessment requirements. The proposed amendments are designed to improve clarity and avert the unintended consequences of the current graduation assessment policy.

- 138. COMMENT:** The commenter expressed support for improved assessments and multiple pathways because it is not acceptable that only 29 percent of New Jersey students are passing both ELA and mathematics State assessments. The commenter noted that unless another tool is being suggested, the discussion should be ongoing. **(A)**

- 139. RESPONSE:** The commenter is referencing a diagram presented by the Department, which broke down what assessments the graduating class of 2017 utilized to meet the graduation assessment requirements. Approximately 29 percent passed both the ELA 10 and Algebra I State assessments, 61 percent utilized the menu of alternative assessment options to meet one or both of the ELA and mathematics graduation assessment requirements. The Department presented this data along with State assessment results from spring 2018 to accentuate the urgency of considering the Department's proposal.

More than 65,000 students in the class of 2017 did not pass either Algebra I or ELA 10. Preliminary data analysis demonstrates that the classes of 2020 and 2021 are on similar trajectories. As current graduation rules for class of 2021 remove the menu of alternative assessments, all the students who did not pass ELA 10 and Algebra I will have to meet the graduation assessment requirements by utilizing the portfolio appeals process. Moreover, students will have access to this process only after sitting for multiple end-of-course State assessments and engaging in at least one round of remediation and retaking of the assessment. The Department remains committed to further conversations with stakeholders and the State Board regarding graduation requirements. The Department also acknowledges that students in the class of 2020 currently have access to a menu of options that align with pathways to post-secondary success. However, students in the class of 2021 are current sophomores and are demonstrating proficiency on high school State assessments in percentages similar to the class of 2017 as described above; therefore, the Department recommends the State Board move the proposed rulemaking through the regulatory process with as much urgency as possible.

- 140. COMMENT:** The commenter stated that PARCC or high-stakes assessments are end-of-year assessments and data from formative assessments is key. The commenter also stated that PARCC was a catalyst for the current focus on data and how to use it to improve instruction and student outcomes. (G)

**RESPONSE:** The Department agrees with the commenter. The use of data regarding a student's progress toward State standards help inform instruction and provide one measure of a student's strengths and weaknesses. However, State assessments do not necessarily provide the specific information that a teacher needs to analyze the root cause of a student's academic struggles and to identify learning gaps. As evidenced by Superintendents Robert Zywicki and Michael Salvatore who presented at the September 12, 2018, State Board meeting, school districts rely on a wealth of data, notably locally selected formative assessments, and strategies that target the learning standards with which a student struggles as critical tools to help close learning gaps.

- 141. COMMENT:** The commenter stated that the consequences of the existing State assessment graduation policy are not unintended. The commenter stated that the State Board set high goals for school districts and students to meet. The commenter noted that the Department must be vigilant in ensuring that the high standard is maintained and there is no way around it. (F)

**RESPONSE:** The Department is not proposing to change the New Jersey Student Learning Standards (NJSLS), the quality of State assessments, or the graduation assessment requirements of Algebra I and ELA 10. The proposed amendments will reduce the number of State assessments and the remaining assessments will enable school districts to continue to measure student performance and to support students for success. The Department strongly advocates for differentiation of instruction by educators throughout a student's career so each student can receive the individualized supports necessary for his or her academic success. There are many ways of assessing students to gauge learning. At one of the most critical times in students' academic careers -- when they are seeking to meet high school graduation requirements -- the level of individualization advocated for in instruction is relinquished in order to require all students to demonstrate learning in the exact same way.

- 142. COMMENT:** The commenter stated that progress in the Weehawken School District is not necessarily reflected across the State. The commenter noted that the school district's results for Geometry and Algebra II State assessments were not provided as part of Superintendent Zywicki's presentation. (A)

**RESPONSE:** In 2018, the percent of students in the Weehawken School District who met or exceeded expectations in Geometry was 22.7 percent compared to 5.5 percent in 2015. In 2018, the percent of students who met or exceeded expectations in Algebra II was 13.5 percent compared to 20 percent in 2015. Superintendent Zywicki noted that not having to administer Geometry and Algebra II State assessments, as well as ELA 9 and 11, will save instructional time.

The Department's proposals rely on a theory of action that State assessments such as ELA 9 and 11, Geometry, and Algebra II do not inherently ensure that all school districts fulfill their responsibility to provide requisite services for students. Instead, the proposal relies on the theory that a streamlined high school assessment system, combined with existing accountability measures, will focus valuable resources directly to initiatives and services to allow the State and school districts to divert valuable resources such as time and talent to better support students' academic needs and to customize their preparation for career pathways.

- 143. COMMENT:** The commenter asked Weehawken School District Superintendent Robert Zywicki whether it took six months from when the students took the PARCC assessment for the school district to receive the results. **(B)**

**RESPONSE:** Superintendent Zywicki responded that Weehawken School District received its PARCC results in June, which is too late to implement support measures if a teacher noticed in January that a student might be struggling.

School districts, including Weehawken, do not rely on information from State assessments alone to identify student learning needs. The Department continues to assert that it is important to consider multiple measures to determine student needs and that State assessment information should not be used in isolation. During the last four years, the Department has significantly decreased the amount of time between when students are administered the State assessments and when school districts are provided the results. The significantly shortened time for returning reports over the past four years has increased the value of State assessments for school districts. State assessments remain an important tool for accountability and transparency.

Currently, the Department issues assessment reports multiple times throughout the summer. For example, the assessment window for the 2018-2019 school year ended June 8, 2018. The Department then provided school districts approximately one week to clean up their data. On June 14, 2018, the Department released the first report, which provided school districts the opportunity to view student scores online. The Department also issued the aggregate results at the end of July. In August, the Department will issue additional reports so all reports will have been provided to school districts before the first day of school for the 2018-2019 school year. The full schedule of reporting dates can be found on the Department's [website](https://homeroom5.doe.state.nj.us/broadcasts/2018/JUN/25/18564/PARCC%20Score%20Report%20Release%20Schedule.pdf) at <https://homeroom5.doe.state.nj.us/broadcasts/2018/JUN/25/18564/PARCC%20Score%20Report%20Release%20Schedule.pdf>.

- 144. COMMENT:** The commenter requested more information on all five performance levels for State assessment results, including the percentage of students reaching each level. The commenter noted that it has been suggested that including Performance Level 3 as mastering the NJSLS would increase the percentage of students considered as passing by 25 percent. **(B)**

**RESPONSE:** For the spring 2017 administration of the Algebra I State assessment, 42 percent of students tested met or exceeded expectations. If Performance Level 3 (Approaching Expectations) was considered Meeting Expectations, the passage rate would be 66 percent. Twelve percent of those tested received a Level 1 or Not Yet Meeting Expectations. Twenty-two percent of those tested received a Level 2 or Partially Meeting Expectations. However, the Department is not proposing to lower the current graduation assessment requirements. Changing the Performance Level 4 minimum requirement to Performance Level 3 would lower expectations.

- 145. COMMENT:** The commenter asked how many states use Performance Level 4 on State assessments as passing. **(C)**

**RESPONSE:** Maryland and New Mexico both use the PARCC assessments as one of their high school graduation requirements. In Maryland, current high school students and first time test-takers need a 725 (Performance Level 3) in Algebra I and ELA 10 to meet the graduation requirement, but current seventh graders and below will need a 750 (Performance Level 4) in Algebra I and ELA 10 to meet the assessment graduation requirement. In New Mexico, students need a 750 (Performance Level 4) in Algebra II and ELA 11 to meet assessment graduation requirement.

**146. COMMENT:** The commenter asked at which level the rulemaking process will be at the next meeting. (C)

**RESPONSE:** The proposed rulemaking was not considered at Proposal Level in September to allow for more time for discussion. For the October State Board meeting, the proposed rulemaking will be presented at Proposal Level.

**147. COMMENT:** The commenters expressed support for the Department's proposed amendments to N.J.A.C. 6A:8. (1181-2954, 2972, 2974)

**RESPONSE:** The Department thanks the commenters for the support.

**148. COMMENT:** The commenters expressed support for the Department's proposed amendment to extend to the class of 2021 and beyond the ability to access multiple pathways to graduation since students should have options for fulfilling graduation requirements. (1181, 1185, 1186, 1201, 1209, 1216, 1218, 1230, 1235, 1238, 1247, 1265, 1274, 1287, 1290, 1291, 1304, 1317, 1318, 1319, 1322, 1327, 1331, 1334, 1342, 1347, 1348, 1353, 1356, 1358, 1359, 1360, 1368, 1371, 1381, 1382, 1383, 1392, 1392, 1395, 1399, 1409, 1417, 1423, 1431, 1433, 1435, 1450, 1452, 1459, 1460, 1465, 1487, 1491, 1492, 1500, 1506, 1509, 1538, 1547, 1550, 1565, 1568, 1571, 1574, 1575, 1578, 1582, 1589, 1603, 1617, 1620, 1625, 1627, 1635, 1638, 1645, 1646, 1651, 1658, 1661, 1667, 1677, 1698, 1706, 1713, 1717, 1734, 1739, 1744, 1751, 1752, 1755, 1759, 1768, 1770, 1773, 1779, 1780, 1786, 1791, 1802, 1803, 1806, 1810, 1811, 1813, 1820, 1824, 1830, 1839, 1844, 1848, 1859, 1867, 1873, 1881, 1893, 1897, 1899, 1913, 1918, 1922, 1937, 1940, 1942, 1947, 1958, 1966, 1973, 1975, 1979, 1987, 2005, 2015, 2016, 2022, 2027, 2031, 2033, 2043, 2060, 2069, 2080, 2096, 2101, 2123, 2130, 2134, 2146, 2149, 2151, 2153, 2159, 2176, 2189, 2191, 2196, 2197, 2198, 2213, 2217, 2218, 2219, 2227, 2235, 2286, 2300, 2306, 2308, 2318, 2320, 2330, 2335, 2338, 2340, 2346, 2362, 2367, 2373, 2376, 2384, 2388, 2391, 2401, 2409, 2429, 2430, 2435, 2440, 2453, 2468, 2481, 2484, 2505, 2507, 2513, 2523, 2524, 2525, 2528, 2530, 2539, 2547, 2551, 2552, 2561, 2567, 2568, 2600, 2613, 2614, 2616, 2619, 2620, 2621, 2629, 2630, 2647, 2653, 2668, 2671, 2672, 2678, 2680, 2683, 2685, 2687, 2695, 2700, 2705, 2707, 2710, 2716, 2722, 2729, 2736, 2745, 2746, 2751, 2753, 2755, 2756, 2761, 2766, 2782, 2804, 2809, 2824, 2833, 2834, 2837, 2838, 2847, 2849, 2862, 2867, 2868, 2874, 2882, 2889, 2891, 2895, 2898, 2901, 2917, 2918, 2924, 2931, 2932, 2934, 2943, 2952, 2972)

**RESPONSE:** The Department thanks the commenters for the support.

**149. COMMENT:** The commenters opposed PARCC assessments as a State requirement for high school graduation. (16, 1193, 1206, 1238, 1242, 1257, 1278, 1280, 1319, 1330, 1334, 1346, 1371, 1380, 1424, 1428, 1442, 1444, 1446, 1448, 1464, 1528, 1529, 1541, 1552, 1561, 1573, 1573, 1594, 1609, 1659, 1686, 1704, 1726, 1741, 1751, 1783, 1791, 1810, 1813, 1852, 1854, 1862, 1870, 1892, 1893, 1896, 1922, 1965, 1974, 1979, 1980, 1987, 2013, 2020, 2027, 2050, 2053, 2068, 2102, 2116, 2131, 2135, 2142, 2151, 2159, 2163, 2167, 2172, 2213, 2241, 2247, 2303, 2318, 2323, 2386, 2395, 2401, 2405, 2452, 2471, 2475, 2513, 2558, 2621, 2636, 2644, 2646, 2659, 2765, 2677, 2685, 2713, 2743, 2768, 2828, 2866, 2874)

**RESPONSE:** At this time, the Department is proposing that students in the class of 2021 and beyond who take but do not pass the Algebra I and/or ELA 10 assessments may avail themselves of the portfolio appeals process or achieve a passing score on an alternative competency test as determined by the Commissioner (including the SAT and Armed Services Vocational Aptitude Battery-Armed Forces Qualification Test or ASVAB-AFQT). The opportunity to access the

menu of alternative competency tests currently exists for the classes of 2019 and 2020. The Department looks forward to the next phase of engagement and outreach to continue to collaborate with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

- 150. COMMENT:** The commenters suggested replacing the State graduation assessments with alternative assessments such as the PSAT, SAT, ACT, or ASVAB-AFQT. **(1319, 1323, 1330, 1486, 1731, 2391, 2743, 2786, 2874)**

**RESPONSE:** At this time, the Department is proposing that students in the class of 2021 and beyond who take but do not pass the Algebra I and/or ELA 10 assessments may avail themselves of the portfolio appeals process or achieve a passing score on an alternative competency test as determined by the Commissioner (including the SAT and ASVAB-AFQT). The opportunity to access the menu of alternative competency tests currently exists for the classes of 2019 and 2020. The Department looks forward to the next phase of engagement and outreach to continue to collaborate with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

- 151. COMMENT:** The commenter suggested returning to the High School Proficiency Assessment (HSPA) as a high school graduation requirement or using the PSAT and SAT. **(2689)**

**RESPONSE:** At this time, the Department is proposing that students in the class of 2021 and beyond who take but do not pass the Algebra I and/or ELA 10 assessments may avail themselves of the portfolio appeals process or achieve a passing score on an alternative competency test as determined by the Commissioner (including the SAT and ASVAB-AFQT). The opportunity to access the menu of alternative competency tests currently exists for the class of 2019 and for students who first take all required high school State assessments in the class of 2020. The Department looks forward to the next phase of engagement and outreach to continue to collaborate with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

- 152. COMMENT:** The commenter stated that graduation requirements should reflect the diversity of the student body and their individual abilities. **(1458)**

**RESPONSE:** The Department is proposing that students in the class of 2021 and beyond who take but do not pass the Algebra I and/or ELA 10 assessments may avail themselves of the portfolio appeals process or achieve a passing score on an alternative competency test as determined by the Commissioner (including the SAT and ASVAB-AFQT). The opportunity to access the menu of alternative competency tests currently exists for the classes of 2019 and 2020. The Department looks forward to its second phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders on critical questions regarding what types of high school graduation requirements best inform students, educators, and school communities about whether students have mastered the skills and knowledge they need to advance beyond high school.

- 153. COMMENT:** The commenter stated that high school exit exams are unfair and do not serve the interests of the students because even the best students can have bad test days. The commenter also stated that too much emphasis is being placed on a single assessment, instead of weighing a student's progress through years of instruction based on homework, participating in class, and taking locally selected tests. **(2707)**

**RESPONSE:** State law requires development and administration of a State assessment as part of the standards for graduation requirements. State assessments are only one component of the graduation requirements. Pursuant to N.J.A.C. 6A:8-5.1, students need to satisfactorily fulfill course requirements and school district graduation requirements as developed and implemented by district boards of education.

- 154. COMMENT:** The commenter expressed support for the proposed amendments. The commenter stated that the proposed amendments to the graduation requirements will help both high-functioning, academically successful students and students who struggle with learning disabilities. The commenter further stated that students with disabilities, regardless of their disability, are expected to pass the PARCC assessment even though almost all special education students in one school district who are sent to out-of-district schools due to their disability cannot achieve a passing PARCC score, which places undue pressure on students. **(1431)**

**RESPONSE:** The Department thanks the commenter for the support.

- 155. COMMENT:** The commenters expressed support for the proposed amendments that will ensure students continue to have multiple pathways for meeting high school graduation requirements. The commenters stated that the proposed amendments do not eliminate PARCC but bring a more focused and intentional approach to student assessment by recognizing that PARCC is only one of multiple ways of assessing student learning. **(26-1180, 2973)**

**RESPONSE:** The Department thanks the commenters for the support.

- 156. COMMENT:** The commenter stated that the proposed amendments to graduation assessment requirements do not fully comply with current State statute, which requires an 11<sup>th</sup> grade assessment to meet State graduation requirements. **(6)**

**RESPONSE:** The Department cannot respond to the commenter's legal arguments because the issue raised is the subject of ongoing litigation.

- 157. COMMENT:** The commenter expressed support for the proposed amendments that will provide for the class of 2021 and beyond the alternative pathways (other standardized assessment and the portfolio appeals) for students to meet the State assessment requirement to graduate from high school, noting that New Jersey is one of only 12 states that still use a high school exit assessment. **(10)**

**RESPONSE:** The Department thanks the commenter for the support.

- 158. COMMENT:** The commenters opposed PARCC as an assessment tool. **(381, 1181, 1183, 1191, 1193, 1196, 1204, 1210, 1218, 1241, 1243, 1245, 1251, 1271, 1280, 1281, 1285, 1298, 1305, 1321, 1323, 1324, 1325, 1339, 1345, 1346, 1349, 1352, 1356, 1360, 1379, 1391, 1399, 1401, 1413, 1424, 1426, 1440, 1441, 1442, 1443, 1466, 1469, 1470, 1485, 1496, 1499, 1502, 1506, 1508, 1511, 1513, 1514, 1520, 1528, 1529, 1530, 1531, 1542, 1544, 1546, 1552, 1562, 1564, 1565, 1573, 1574, 1578, 1579, 1586, 1594, 1597, 1607, 1608, 1609, 1614, 1622, 1635, 1639, 1644, 1656, 1660, 1665, 1680, 1681, 1691, 1692, 1872, 1714, 1724, 1727, 1741, 1743, 1751, 1765, 1781, 1782, 1783, 1793, 1800, 1801, 1806, 1809, 1817, 1823, 1829, 1832, 1841, 1873, 1899, 1905, 1907, 1909, 1929, 1935, 1955, 1956, 1963, 1979, 2019, 2023, 2038, 2042, 2045, 2065, 2068, 2082, 2085, 2115, 2120, 2132, 2139, 2143, 2152, 2154, 2159, 2162, 2163, 2166, 2170, 2176, 2198, 2209, 2215, 2221, 2227, 2237, 2238, 2248, 2255, 2259, 2263, 2265, 2266, 2269, 2287, 2306, 2323, 2325, 2333, 2347, 2351, 2374, 2376, 2378, 2379, 2396, 2398, 2433, 2434, 2473, 2477, 2482, 2486, 2487, 2503, 2508, 2529, 2534, 2538, 2541, 2558, 2571, 2575,**

2577, 2581, 2586, 2608, 2626, 2628, 2636, 2644, 2650, 2652, 2657, 2675, 2677, 2691, 2696, 2698, 2708, 2710, 2718, 2734, 2746, 2760, 2768, 2769, 2771, 2774, 2775, 2788, 2793, 2816, 2828, 2831, 2832, 2841, 2842, 2847, 2874, 2877, 2879, 2881, 2886, 2888, 2897, 2927, 2943, 2947)

**RESPONSE:** The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

159. **COMMENT:** The commenters stated that PARCC assessments do not accurately reflect students' knowledge, skills and abilities, or their educational attainment and performance. (1193, 1195, 1213, 1221, 1290, 1324, 1330, 1340, 1355, 1371, 1397, 1407, 1408, 1470, 1506, 1511, 1513, 1536, 1542, 1574, 1635, 1649, 1686, 1727, 1743, 1747, 1765, 1780, 1788, 1864, 1873, 1906, 1933, 1969, 2000, 2023, 2117, 2179, 2198, 2208, 2240, 2255, 2265, 2365, 2373, 2374, 2429, 2445, 2460, 2487, 2496, 2506, 2529, 2534, 2541, 2545, 2560, 2688, 2724, 2735, 2739, 2742, 2775, 2791, 2812, 2842, 2847, 2863, 2877, 2883, 2890, 2902, 2922, 2943, 2945, 2949, 2951, 2812)

**RESPONSE:** PARCC assessments were designed to measure a snapshot of student performance against the Common Core State Standards, to which the NJSLS are aligned. New Jersey's State assessments have undergone the federally required peer-review process, which confirms that assessments are valid and accurately measure the NJSLS. They are a single component of the multiple measures that educators utilize to obtain comprehensive insight into students' overall performance and achievement.

160. **COMMENT:** The commenter supported the proposed amendments because the PARCC assessment was not designed to be an exit exam and setting the passing score at Performance Level 4 or 5 will prevent many students from graduating. The commenter stated that it is extremely unfair that a current senior in high school is able to use the PSAT to fulfill the State assessment graduation requirement, while a junior will not be allowed to utilize the PSAT next year under the current regulations. (2965)

**RESPONSE:** The Department thanks the commenter for the support, and agrees with the urgent need to address the unintended negative consequences of the current regulation.

161. **COMMENT:** The commenter stated that the high stakes of PARCC as a graduation requirement is an onerous and unnecessary burden negatively impacting students' mental health. The commenter stated that the PARCC assessments create unneeded stress for students, take time away from teaching, constrain curriculum, and fail to provide teachers or parents with data that is timely and actionable. (6)

**RESPONSE:** The Department anticipates that reducing the high school State assessment schedule will have a positive impact on students' social-emotional learning.

162. **COMMENT:** The commenter stated that the PARCC assessments should not be the only measurement tool to assess whether a student is meeting the NJSLS, as PARCC does not take into account the diversity of the students in the State. The commenter suggested that allowing a student to take other assessments and use the portfolio method would also provide for assessment of students' knowledge. (1867)

**RESPONSE:** New Jersey's State assessments are a single component of the multiple measures that educators utilize to obtain comprehensive insight into students' overall performance and

achievement. The proposed amendments to N.J.A.C. 6A:8-5.1(f) would extend the alternative competency assessment options (including the SAT, ACT, ACCUPLACER, and ASVAB-AFQT) to the class of 2021 and beyond. The Department intends to continue the comprehensive evaluation of New Jersey's State assessment program and high school graduation requirements as the transition to the next generation of State assessments continues.

- 163. COMMENT:** The commenter stated that the best way to provide students a well-rounded, high-quality public education is to ensure that educators have the time and resources needed to teach students, which can be accomplished by reducing the number of required assessments. **(1158)**

**RESPONSE:** The Department thanks the commenter for the support, and agrees that reducing the number of hours students spend taking State assessments is expected to allow school districts to divert resources such as time and talent to better support students' academic needs and customize their preparation for career pathways.

- 164. COMMENT:** The commenter stated that learning and educational outcomes can be improved by changing the classroom from a testing center into a learning environment. **(2003)**

**RESPONSE:** The Department is committed to ensure that all students have access to high-quality instruction, and reducing the number of hours students spend taking State assessments is expected to allow school districts to divert resources such as time and talent to better support students' academic needs and customize their preparation for career pathways.

- 165. COMMENT:** The commenters stated that more time is spent on preparing and gearing up for State assessments rather than teaching students the skills and knowledge needed for college or post-secondary life. **(1610, 1876, 2970)**

**RESPONSE:** The Department is committed to ensure that all students have access to high-quality instruction, and reducing the number of hours students spend taking State assessments is expected to allow school districts to divert resources such as time and talent to better support students' academic needs and customize their preparation for career pathways.

- 166. COMMENT:** The commenters stated that teachers spend more time teaching the test to students than on classroom instruction. **(1215, 1423, 2086, 2231, 2350, 2943)**

**RESPONSE:** The Department is committed to ensure that all students have access to high-quality instruction, and reducing the number of hours students spend taking State assessments is expected to allow school districts to divert resources such as time and talent to better support students' academic needs and customize their preparation for career pathways.

- 167. COMMENT:** The commenter stated that teachers should be focused on teaching and caring about students, rather than worried about passing the next test. **(1587)**

**RESPONSE:** The Department is committed to reducing the number of hours students spend taking State assessments, which is expected to allow school districts to divert resources such as time and talent to better support students' academic needs and customize their preparation for career pathways.

- 168. COMMENT:** The commenter stated that students should have more time in class and less time taking assessments. **(2344)**

**RESPONSE:** The Department is committed to reducing the number of hours students spend taking State assessments, which is expected to allow school districts to divert resources such as time and talent to better support students' academic needs and customize their preparation for career pathways.

169. **COMMENT:** The commenter stated that not all high school students are interested in attending college and should be able to prepare for a career, but assessments and test preparation leave little room for students to select valuable career-oriented electives. (530)

**RESPONSE:** The Department is committed to ensuring that all students have access to high-quality curriculum and instruction that prepares them for college and careers, and reducing the number of hours students spend taking State assessments is expected to allow school districts to divert resources such as time and talent to better support students' academic needs and customize their preparation for career pathways.

170. **COMMENT:** The commenter stated that the proposed reduction in the amount of high school assessments will have a significant impact on students' ability to access the schools' libraries and media center resources and programs. (2971)

**RESPONSE:** The Department thanks the commenter for the support.

171. **COMMENT:** The commenters expressed the concern that the current State assessment system is detrimental and disruptive to the students' learning experience, which includes the loss of instructional time and educators' ability to teach. (1158, 1181, 1182, 1184, 1188, 1196, 1206, 1207, 1208, 1210, 1211, 1217, 1219, 1221, 1232, 1234, 1235, 1237, 1239, 1240, 1244, 1246, 1249, 1253, 1258, 1259, 1261, 1265, 1270, 1271, 1276, 1277, 1279, 1280, 1290, 1291, 1293, 1299, 1303, 1305, 1312, 1313, 1314, 1319, 1320, 1326, 1328, 1331, 1332, 1333, 1334, 1336, 1339, 1340, 1350, 1360, 1370, 1371, 1373, 1374, 1385, 1397, 1399, 1402, 1403, 1407, 1409, 1410, 1412, 1418, 1419, 1420, 1422, 1425, 1426, 1434, 1435, 1437, 1444, 1445, 1446, 1452, 1453, 1460, 1461, 1462, 1463, 1467, 1469, 1472, 1473, 1482, 1489, 1492, 1495, 1497, 1503, 1507, 1508, 1509, 1519, 1520, 1523, 1529, 1530, 1535, 1539, 1547, 1550, 1556, 1559, 1564, 1570, 1574, 1580, 1582, 1585, 1587, 1590, 1593, 1595, 1597, 1598, 1600, 1608, 1610, 1611, 1612, 1622, 1623, 1624, 1627, 1631, 1637, 1640, 1641, 1644, 1646, 1654, 1656, 1660, 1670, 1672, 1674, 1677, 1678, 1679, 1682, 1685, 1688, 1689, 1690, 1692, 1703, 1707, 1708, 1709, 1715, 1727, 1731, 1739, 1750, 1756, 1758, 1774, 1776, 1779, 1782, 1787, 1788, 1790, 1791, 1792, 1794, 1799, 1807, 1812, 1817, 1820, 1822, 1823, 1830, 1834, 1841, 1850, 1861, 1864, 1867, 1868, 1872, 1876, 1877, 1887, 1891, 1893, 1894, 1896, 1899, 1901, 1909, 1911, 1915, 1919, 1922, 1925, 1926, 1929, 1952, 1955, 1956, 1963, 1970, 1979, 1984, 1995, 2014, 2016, 2017, 2018, 2025, 2026, 2027, 2038, 2040, 2043, 2044, 2054, 2055, 2056, 2062, 2068, 2074, 2078, 2086, 2097, 2098, 2105, 2106, 2114, 2115, 2119, 2125, 2126, 2132, 2136, 2137, 2140, 2144, 2151, 2152, 2157, 2159, 2160, 2164, 2166, 2173, 2175, 2178, 2179, 2184, 2185, 2186, 2189, 2191, 2205, 2221, 2224, 2227, 2230, 2237, 2238, 2241, 2246, 2260, 2268, 2271, 2276, 2290, 2294, 2320, 2321, 2324, 2327, 2343, 2344, 2350, 2351, 2352, 2357, 2364, 2373, 2393, 2396, 2403, 2410, 2412, 2413, 2420, 2424, 2425, 2426, 2429, 2431, 2444, 2447, 2460, 2463, 2466, 2493, 2500, 2503, 2518, 2521, 2525, 2529, 2531, 2537, 2539, 2540, 2541, 2543, 2547, 2550, 2553, 2555, 2559, 2566, 2568, 2569, 2592, 2593, 2599, 2607, 2610, 2616, 2621, 2626, 2630, 2631, 2635, 2643, 2658, 2667, 2674, 2679, 2680, 2685, 2692, 2695, 2699, 2700, 2707, 2708, 2712, 2715, 2717, 2718, 2721, 2750, 2755, 2758, 2770, 2773, 2783, 2784, 2787, 2789, 2791, 2796, 2797, 2799, 2802, 2804, 2807, 2827, 2832, 2833, 2834, 2842, 2847, 2853, 2854, 2855, 2869, 2874, 2875, 2878, 2881, 2882, 2883, 2887, 2898, 2900, 2908, 2912, 2913, 2924, 2925, 2927, 2930, 2937, 2941, 2942, 2943, 2945, 2946, 2951, 2953. 2972)

**RESPONSE:** The Department’s proposal to reduce the number of assessments and number of hours students spend taking State assessments is expected to allow school districts to divert resources such as time and talent to better support students’ academic needs and customize their preparation for career pathways.

172. **COMMENT:** The commenters stated that the number of State assessments and the amount of time spent on the assessments should be reduced. (1158, 1181, 1184, 1188, 1201, 1208, 1209, 1218, 1234, 1239, 1244, 1248, 1249, 1259, 1265, 1266, 1274, 1279, 1287, 1295, 1299, 1304, 1313, 1315, 1321, 1324, 1328, 1331, 1333, 1334, 1335, 1342, 1358, 1359, 1365, 1373, 1378, 1379, 1381, 1393, 1409, 1410, 1417, 1419, 1423, 1425, 1433, 1435, 1444, 1450, 1452, 1455, 1456, 1459, 1460, 1461, 1464, 1487, 1492, 1493, 239, 1497, 1503, 1507, 1508, 1519, 1528, 1547, 1550, 1561, 1563, 1564, 1568, 1571, 1574, 1575, 1582, 1583, 1589, 1590, 1595, 1604, 1606, 1609, 1620, 1625, 1626, 1645, 1651, 1655, 1656, 1658, 1661, 1671, 1672, 1674, 1677, 1684, 1688, 1692, 1698, 1706, 1713, 1715, 1716, 1721, 1733, 1737, 1739, 1744, 1746, 1747, 1749, 1752, 1755, 1767, 1770, 1772, 1776, 1778, 1780, 1784, 1802, 1811, 1813, 1823, 1828, 1830, 1842, 1850, 1854, 1859, 1864, 1869, 1873, 1878, 1881, 1892, 1894, 1896, 1897, 1909, 1913, 1919, 1921, 1923, 1926, 1927, 1923, 1942, 1944, 1948, 1962, 1963, 1966, 1970, 1973, 1986, 1989, 1998, 2005, 2003, 2036, 2053, 2058, 2060, 2062, 2065, 2068, 2069, 2070, 2080, 2095, 2097, 2101, 2104, 2119, 2125, 2131, 2136, 2149, 2151, 2153, 2159, 2160, 2178, 2179, 2181, 2187, 2189, 2191, 2196, 2197, 2221, 2235, 2241, 2255, 2263, 2289, 2302, 2303, 2306, 2320, 2335, 2340, 2342, 2346, 2357, 2366, 2367, 2376, 2384, 2388, 2391, 808, 2406, 2409, 2410, 2412, 2413, 2422, 2429, 2435, 2438, 2440, 2444, 2449, 2466, 2481, 2484, 2505, 2507, 2518, 2523, 2524, 2525, 2530, 2538, 2549, 2551, 2552, 2560, 2561, 2568, 2592, 2595, 2597, 2602, 2613, 2614, 2615, 2616, 2620, 2626, 2631, 2643, 2646, 2650, 2653, 2678, 2679, 2680, 2683, 2685, 2687, 2692, 2705, 2709, 2712, 2721, 2722, 2726, 2729, 2736, 2739, 2741, 2745, 2747, 2750, 2751, 2755, 2756, 2760, 2761, 2766, 2768, 2770, 2777, 2783, 2783, 2787, 2789, 2796, 2804, 2807, 2837, 2839, 2846, 2854, 2856, 2862, 2867, 2868, 2882, 2882, 2886, 2891, 2895, 2901, 2910, 2914, 2917, 2918, 2924, 2928, 2930, 2931, 2932, 2933, 2934, 2935, 2937, 2941, 2942, 2945, 2952, 2957, 2972)

**RESPONSE:** The Department’s proposal to reduce the number of assessments and number of hours students spend taking State assessments is expected to allow school districts to divert resources such as time and talent to better support students’ academic needs and customize their preparation for career pathways.

173. **COMMENT:** The commenters stated that the current State assessment system causes unnecessary stress and anxiety for students and educators. (1158, 1182, 1183, 1219, 1233, 1234, 1238, 1277, 1280, 1281, 1285, 1290, 1320, 1326, 1357, 1360, 1368, 1370, 1374, 1376, 1396, 1402, 1418, 1422, 1426, 1437, 1445, 1463, 1465, 1482, 1484, 1485, 1489, 1509, 1523, 1528, 1529, 1557, 1572, 1585, 1597, 1598, 1624, 1645, 1679, 1681, 1703, 1731, 1741, 1772, 1785, 1786, 1828, 1841, 1854, 1856, 1868, 1894, 1899, 1908, 1909, 1921, 1922, 1963, 1989, 1991, 2016, 2025, 2027, 2040, 2096, 2100, 2114, 2115, 2120, 2127, 2132, 2140, 2150, 2154, 2185, 2189, 2215, 2222, 2230, 2238, 2239, 2255, 2271, 2302, 2327, 2335, 2342, 2343, 2349, 2364, 2366, 2396, 2403, 2405, 2420, 2438, 2460, 2465, 2483, 2503, 2517, 2528, 2530, 2536, 2547, 2550, 2553, 2555, 2558, 2559, 2566, 2569, 2577, 2592, 2593, 2603, 2610, 2658, 2683, 2701, 2707, 2708, 2717, 2721, 2757, 2763, 2765, 2777, 2783, 2789, 2790, 2799, 2802, 2806, 2830, 2841, 2847, 2877, 2883, 2887, 2898, 2899, 2912, 2924, 2927, 2937, 2942, 2945)

**RESPONSE:** State assessments are a valuable tool for understanding student performance in all schools and school districts across the State and are mandated by State and Federal law. However, the Department is committed to transitioning assessments in a way that will be further informed by best State practices and research, and will minimize unnecessary disruption to

student learning. The Department looks forward to its second phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders regarding various aspects of the next generation of assessments, including testing times and format.

- 174. COMMENT:** The commenter stated that the money spent on testing should be reallocated to improving the quality of education and educational services. **(1270)**

**RESPONSE:** While Federal law requires all states to administer the same assessments to all students in ELA and mathematics in grades three through eight, and once in high school, the Department expects that the proposal will allow school districts to divert resources such as time and talent to better support students' academic needs and customize their preparation for career pathways. The proposal continues to align to Federal law and to use State assessments as one important metric to ensure the State is identifying and supporting the schools and school districts that most need assistance.

- 175. COMMENT:** The commenters stated that PARCC depletes resources from schools. **(1638, 1680, 1560, 1654, 1782, 2170)**

**RESPONSE:** While Federal law requires all states to administer the same assessments to all students in ELA and mathematics in grades three through eight, and once in high school, the Department expects that the proposal will allow school districts to divert resources including time and talent, at the high school level, to better support students' academic needs and customize their preparation for post-secondary pathways. The proposal continues to align to Federal law and to use State assessments as one important metric to ensure the state is identifying and supporting the schools and school districts that most need assistance.

- 176. COMMENT:** The commenter stated that ninth grade assessments are necessary to know how a student is performing academically. **(2975)**

**RESPONSE:** Although State assessment results are an important indicator of student success, the Department provided data at the August 1, 2018, State Board meeting demonstrating that the high school assessments in ELA 9 and 11, Geometry, and Algebra II do not provide enough unique or different data to the Department or broader public to warrant the resources necessary to administer the additional assessments.

- 177. COMMENT:** The commenter stated it is unclear how eliminating high school exams will help address college and career readiness issues as there is little evidence that the proposed amendments will contribute to the Department's goal of college and career readiness. The commenter stated that studies have shown that PARCC is a valid predictor of college performance and successful at assessing complex skills. The commenter stated that the State has a college remediation problem considering only 60 percent of New Jersey high school students prepared for college and 70 percent of first-year community college students needing remedial courses, which results in students having to spend more time, money, and resources to learn content they should have learned in high school and often increases student debt and the likelihood of students dropping out. **(25)**

**RESPONSE:** The Department maintains that State assessments are a valuable tool for educators, students, and families. Nevertheless, State assessments are single snapshots of student learning. The Department, school districts, and families share responsibility for preparing high school students for postsecondary success. New Jersey is evolving its priorities to ensure that students have multiple opportunities to demonstrate their readiness and are provided the remediation and

support they need to increase their performance on State assessments. Additionally, the Department contends that State assessments are a single measure of college readiness. Under the Department's proposed amendments, high school students would be assessed at least once in ELA, mathematics, and science as required by Federal law, providing constituent evidence of progress toward postsecondary readiness. By streamlining the calendar of assessments and restoring the menu of assessment options, the Department creates multiple pathways to graduation and aligns student motivation with post-secondary outcomes.

- 178. COMMENT:** The commenter expressed concern over the Department's proposal to eliminate four of the six exams currently required in high school. The commenter specifically expressed concern that ELA 9 and Algebra II exams were being eliminated without a plan in place to ensure all students still receive equitable access to, and support for, the corresponding courses. The commenter stated that research shows ninth grade is critical for students' future success and 10th grade will be too late to diagnose individual student challenges and address achievement gaps. **(8)**

**RESPONSE:** The Department agrees with the commenter that ninth grade is critical for student success and that eighth grade data must be leveraged during students' freshman year. State assessments are a valuable tool for understanding student performance, but not the only tool. In fact, daily assignments, formative assessments, and benchmark assessments are example instructional tools that provide more real-time and specific information that a teacher needs to analyze the root cause of a student's academic struggles and to identify learning gaps. Formative assessments, along with strategies that target the learning standards with which a student struggles, can be used to help close learning gaps. Additionally, the Department provided data at the August 1, 2018, State Board meeting demonstrating that the high school assessments in ELA 9 and 11, Geometry, and Algebra II do not provide enough unique or different data to the Department or broader public to warrant the resources necessary to administer the additional assessments.

- 179. COMMENT:** The commenter stated that Federal law requires students to take one State mathematics assessment in high school. The commenter asked what will be the plan to meet Federal requirements for New Jersey students who take the Algebra I assessment in middle school if the Algebra II assessment is eliminated and the Algebra I assessment becomes the sole State requirement. The commenter asked whether students will have to wait until high school to take Algebra I to satisfy Federal accountability requirements and, thus, delay their ability to advance to Algebra II and other higher-level mathematics courses or if students will be delay taking the Algebra I assessment until years after learning the content. **(8)**

**RESPONSE:** Students who meet their state graduation assessment requirement for mathematics by taking Algebra I in middle school will be required to take a State assessment for a more advanced mathematics course (i.e., Geometry and Algebra II) in high school to meet Federal accountability requirements mandated by ESSA. Under the proposed rulemaking, the Geometry and Algebra II State assessments remain available to students who need to meet the Federal accountability requirement in high school.

- 180. COMMENT:** The commenter expressed support for reduction in high school State assessments. The commenter stated that authentic formative assessments and contemporary benchmark assessments in schools drive instruction far more than score reports generated from end-of-course State assessment results. The commenter also stated that student performance outcomes revealed through standardized test results have been reduced to affirmations of existing school district data, as most educators and school leaders already know the end result because they

intensely track learning daily and modify instruction accordingly with the assistance of common digital tools. (2958)

**RESPONSE:** The Department thanks the commenter for the support.

181. **COMMENT:** The commenter stated that although PARCC has been widely criticized, it prompted a much-needed shift in school districts to invest in technology and digital devices, and resulted in use of digital platforms to develop and implement standards-based assessments that could be used for gathering both formative and summative data. The commenter also stated that the digital platforms gave new meaning to real-time data-driven instruction and school leaders and instructors utilized these same tools to deeply analyze student performance instantaneously, aiding their efforts to provide systemic intervention, remediation, and enrichment. (2958)

**RESPONSE:** The Department thanks the commenter for the support.

182. **COMMENT:** The commenter expressed support for the proposed amendments as a thoughtful step in the right direction. The commenter stated that reducing the quantity of State assessments will not reduce data quality and reducing the amount of time allotted to the State assessments will provide educators with extra time to improve student outcomes. The commenter also stated that the proposed amendments will not lower the bar for students or deprive them of the skills needed to succeed in college and careers because no amount of data collection will ameliorate the effects of poverty, transience, injustice, disability, and other factors beyond educators' control. The commenter stated that the only way to tackle those problems is through high-quality instruction and robust systems of student support. (2959)

**RESPONSE:** The Department thanks the commenter for the support.

183. **COMMENT:** The commenter stated that the State has been able to maintain high standards and foster the highest-quality educational experience in the nation without yet implementing the requirement to pass PARCC to graduate high school. The commenter suggested that the State eliminate exit assessment requirements completely because students are already successfully satisfying the State course mandates, and many students are moving on to higher education thanks to the teachers and school leaders who prepare students for the rigors of postsecondary education. The commenter further stated that approving the proposed amendments to the graduation assessment requirements will allow educators to meet the social-emotional learning needs of students and to assure that graduates do more than master academics by giving educators the freedom to focus on students' psychological well-being. (2956)

**RESPONSE:** The Department thanks the commenter for the support.

184. **COMMENT:** The commenters expressed support for the proposed amendment that will eliminate the requirement that students pass a State assessment to graduate and instead maintain the list of substitute assessments and the portfolio appeals option for students who do not pass the ELA 10 or Algebra I assessment. (2956, 2961, 2960)

**RESPONSE:** The Department thanks the commenters for the support.

185. **COMMENT:** The commenter expressed support for the proposed amendments that will reduce from six to two the number of State assessment students must take in high school, stating that New Jersey is currently the only state besides New York that forces high school students to take six standardized tests instead of the two required by Federal law. The commenter stated that the

additional testing reduces time available for teaching and provides no additional information regarding student performance. (10)

**RESPONSE:** The Department thanks the commenter for the support.

186. **COMMENT:** The commenter stated that PARCC is a series of resource-exhausting summative assessments that produce results well after course completion, while school districts rely on other tools driven by real-time formative assessment data, rather than PARCC, to inform instruction. The commenter stated that the six high school PARCC exams are onerous and a misallocation of resources, and that students would be better served by allocating staff now committed to PARCC administration to the continuation and expansion of the Response to Intervention program. (2957)

**RESPONSE:** The Department expects that the proposed rulemaking will allow school districts to divert resources such as time and talent to better support students' academic needs and to customize their preparation for career pathways.

187. **COMMENT:** The commenter expressed support for the proposed amendments that will reduce the number of high school State assessments because the reduction will increase the capability of school districts to commit to focus on the social, emotional, and academic excellence of students. The commenter also stated that there are plenty of formative and summative assessments utilized by school districts to improve instruction on a daily basis. (2962)

**RESPONSE:** The Department thanks the commenter for the support.

188. **COMMENT:** The commenter urged the Stated Board to eliminate PARCC assessments because they have had a negative impact on students and their learning. (2963)

**RESPONSE:** The Department remains committed to maintaining high expectations for all students, complying with Federal requirements, and, most importantly, considering the needs of all students, including diverse learners, as the proposed rulemaking advances. The Department maintains that State assessments are a valuable tool for educators, students, and families. Nevertheless, State assessments are single snapshots of student learning. The Department, school districts, and families share responsibility for preparing high school students for postsecondary success. New Jersey is evolving its priorities to ensure that students have multiple opportunities to demonstrate their readiness and that they are provided the remediation and support they need to increase their performance on State assessments.

189. **COMMENT:** The commenters urged the State Board to adopt the proposed amendments that will reduce the number of State assessments taken by high school students. (177, 708, 2957, 2964)

**RESPONSE:** The Department thanks the commenters for the support.

190. **COMMENT:** The commenter stated that PARCC is not an appropriate assessment tool and does not consider the realities of the classroom and the multitude of factors that contribute to student growth; therefore, PARCC cannot gauge any progress made within a single classroom across a given school year. The commenter also stated that PARCC negatively affects many elements of education, including curriculum. The commenter stated that curriculum is deeply constrained and challenged by testing time, the expectation for educators to teach to the test, and emphasizing skills that are not related to respective content areas. (2966)

**RESPONSE:** The Department agrees that New Jersey’s State assessments need to evolve and to strengthen their role as an instructional tool. The proposed amendments preserve the high standards and robust State and Federal accountability systems. Using a systems approach to continuous improvement, the Department has proposed targeted amendments to N.J.A.C. 6A:8 that maintain New Jersey’s high expectations for all students, provide actionable data to communities, and focus on graduation assessment requirements. The Department expects that the proposed rulemaking will allow school districts to divert resources such as time and talent to better support students’ academic needs and to customize their preparation for college and career pathways. The Department looks forward to the next phase of engagement and outreach to continue to collaborate with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

- 191. COMMENT:** The commenter supported the Department’s proposal to reduce the time to report assessment results to district boards of education, parents, students, and educators, from 45 days to 30 days following receipt of same by the chief school administrator, stating that PARCC assessment results are received too late to have any relevant use. **(2966)**

**RESPONSE:** The Department thanks the commenter for the support, and clarifies that assessment results will be provided to the public in 60 days and educators, parents, and students will get the results in 30 days under the proposed amendments.

- 192. COMMENT:** The commenter expressed appreciation for the Department’s outreach efforts and for involving stakeholders as part of the conversation on transitioning away from use of PARCC as a State assessment. **(2966)**

**RESPONSE:** The Department thanks the commenter for the support, and looks forward to collaborating with all interested stakeholders during phase two of the assessment outreach.

- 193. COMMENT:** The commenter urged the Department to explore Innovative Assessment Pilot under ESSA, which provides opportunities for assessment to be classroom-based, curriculum-embedded, and grounded in authentic performance, and allows education to improve assessment literacy -- including how to effectively design, objectively score, and expertly use data from performance assessments to inform instructional practice – and make an even more meaningful impact on all students. **(2966)**

**RESPONSE:** The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

- 194. COMMENT:** The commenter supported the Department’s proposal to reduce the time for reporting results but would like to see the time reduce even more so the results can be of more relevant use. **(2966)**

**RESPONSE:** The Department thanks the commenter for the support.

- 195. COMMENT:** The commenter stated that the Department must completely transition away from PARCC and every step the Department makes, such as the proposed reduction in testing from six assessments to two at the high school level, is movement in the right direction. The commenter supported the proposed amendments that will reduce the number of State assessments and ensure that high school students continue to have an appropriate range of options, beyond taking PARCC assessments, to earn a diploma. The commenter stated that the proposed amendments

are a marked improvement over requiring students to take three years of PARCC assessments in high school. (6)

**RESPONSE:** The Department thanks the commenter for the support.

196. **COMMENT:** The commenter urged elimination of PARCC, stating that test preparation and administration take too much valuable time away from teaching and learning. The commenter also stated that PARCC assessment requirements have wasted valuable agency, administrative, teacher, parent, and student resources with insufficient educational benefit. The commenter further stated that PARCC assessments have been included in the State's high school graduation requirements to coerce more students to participate in the assessments even through research indicates that high school graduation assessments do not improve college participation rates or economic prospects and lead to increases in high school dropout rates. (2967)

**RESPONSE:** The Department agrees that New Jersey's State assessment system needs to evolve and strengthen its role as an instructional tool. The Department expects that the proposed rulemaking will allow school districts to divert resources such as time and talent to better support students' academic needs and to customize their preparation for career pathways. The Department's proposal retains the graduation assessment requirements at ELA 10 and Algebra I and maintains the State's high-quality academic standards. The proposal targets a complex regulation that has unintended consequences: N.J.A.C. 6A:8-5.1(f). The Department is proposing to extend access to alternative competency tests, as determined by the Commissioner, or the portfolio appeals process to students in the class of 2021 and beyond who take but do not pass the Algebra I and/or ELA 10 assessment without additional State testing. Alternative means of demonstrating proficiency in ELA 10 and Algebra I and cut scores, as well as the portfolio appeals process and its alignment to the NJSLS, will be revisited as part of the second phase of assessment outreach and engagement. During the second phase, the Department will collect input from education stakeholders on critical questions regarding what types of high school graduation assessment requirements best inform students, educators, and school communities about whether students have mastered the skills and knowledge they need to advance beyond high school.

197. **COMMENT:** The commenters stated that PARCC was poorly designed, contained poorly written questions, created a lack of focus on what is important in education, was not scientifically validated, and provided information that was already known to educators. The commenters also stated the resulting scores were remote, one-dimensional measurements that correlate to the wealth and education of the students' parents of the test-taker. The commenters supported the creation of live, active assessments that engage education stakeholders to come together and creatively solve real-world problems on a perennial basis. (2968)

**RESPONSE:** State assessments are a valuable tool for understanding student performance and are mandated by State and Federal law. However, the Department is committed to transitioning assessments in a way that will be further informed by best State practices and research, and serve as an appropriate tool for measuring student achievement. The Department looks forward to its second phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders regarding various aspects of the next generation of assessments, including testing times and format.

198. **COMMENT:** The commenter thanked the Department for its efforts and stated that while she supports the proposed changes and the idea of assessing student progress so that schools can continuously improve, the PARCC assessments have had major drawbacks. The commenter stated that PARCC assessments are highly disruptive to actual classroom instruction, the questions are poorly written, and due to the emphasis placed on the PARCC assessments, other

subjects that are not part of the assessment are neglected in the lower level grades. The commenter stated that it has impacted students because they are entering high school with virtually no knowledge of history, geography or social studies. The commenter stated that she supports reducing the total amount of assessments administered to students, as well as implementing alternative ways that they can demonstrate mastery. (1636)

**RESPONSE:** The Department thanks the commenter for the support.

199. **COMMENT:** The commenter supported the proposed reduction in the number of PARCC assessments. The commenter also stated testing every student every years disrupts instruction and does not truly assess student proficiency in its current form. The commenter further supported the assessment of student proficiency but urged the creation of a better assessment that causes less disruption in instruction. (302)

**RESPONSE:** The Department thanks the commenters for the support.

200. **COMMENT:** The commenters supported the proposed reduction in the number of PARCC assessments. The commenters stated the proposed reduction will provide students and educators with the opportunity to focus on true teaching and learning that impacts students most. (26-1180, 2973)

**RESPONSE:** The Department thanks the commenters for the support.

201. **COMMENT:** The commenters stated that an over-emphasis on standardized testing leads to negative outcomes for students who experience undue stress, loss of instructional time, and a narrowed curriculum. The commenters also stated the proposed amendments will help move the State toward a better, more balanced, and more educationally appropriate approach to assessing student learning. (26-1180, 2973)

**RESPONSE:** The Department thanks the commenters for the support.

202. **COMMENT:** The commenter stated that the PARCC assessments are no better than previous tests but are expensive and use too much instructional time. The commenter also stated that PARCC provides too little information to teachers and takes too long to deliver results. (2969)

**RESPONSE:** The Department looks forward to the second phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders on critical questions regarding what types of assessment tools and methods best inform and support student performance and achievement.

203. **COMMENT:** The commenter stated that New Jersey is one of a few states to implement PARCC and continuing to administer it is an expensive decision that prioritizes corporations over students. The commenter also stated that funds designated for PARCC could be used for more focused and meaningful initiatives in schools across the State. (909)

**RESPONSE:** The Department expects that the proposed rulemaking will allow school districts to divert resources such as time and talent to better support students' academic needs and to customize their preparation for career pathways.

204. **COMMENT:** The commenter stated that PARCC was implemented before most school districts were able to adapt their curriculum and the proposed amendments will alleviate some of the issues. (1076)

**RESPONSE:** The Department thanks the commenter for the support.

- 205. COMMENT:** The commenter urged support for the proposed amendments due to the amount of emphasis placed on the PARCC assessments and the time dedicated to them. **(643)**

**RESPONSE:** The Department thanks the commenter for the support.

- 206. COMMENT:** The commenter stated that there has been a shift in schools from learning to focusing on the PARCC assessment. The commenter also stated that the testing period alone disrupts school schedules for more than a month. **(1062)**

**RESPONSE:** During the first phase of assessment outreach, the Department listened to educators, students, parents, and broader community members share their experiences, concerns, and questions regarding the PARCC assessments. The Department recorded the concerns, including disruption to instruction and curriculum, along with support for various aspects of the current assessment system. While the Department has proposed to reduce the number of assessments and the time spent on same, the Department looks forward to the next phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders regarding various aspects of the next generation of assessments, including testing times and format.

- 207. COMMENT:** The commenter supported common sense being applied to PARCC. The commenter stated that a student should be taught to learn how to think and not to prepare for PARCC. The commenter also stated that PARCC is a huge money maker for Pearson Inc. and New Jersey needs to join other states that have left the PARCC consortium. **(251)**

**RESPONSE:** The Department thanks the commenter for the support.

- 208. COMMENT:** The commenter supported the proposed reduction in the amount of time spent on administering State assessments. The commenter stated that the technological complexity of the PARCC administration is unnecessary and it taxes a school's guidance and information technology departments to the point that they cannot properly serve students. **(555)**

**RESPONSE:** The Department thanks the commenter for the support.

- 209. COMMENT:** The commenter expressed support for the proposed amendments as a step in the right direction toward the elimination of PARCC. The commenter stated that PARCC results label students who do not do well on standardized assessments. The commenter also stated that the emphasis on PARCC scores has narrowed curriculum and has taken time away from visual and performing arts and physical education classes to dedicate to the areas that are tested. **(93)**

**RESPONSE:** The Department thanks the commenter for the support.

- 210. COMMENT:** The commenter stated that educators need to be allowed to teach and spend time worrying about students rather than a test that poorly represents a realistic education. **(674)**

**RESPONSE:** The Department expects that the proposed rulemaking will allow school districts to divert resources such as time and talent to better support students' academic needs and to customize their preparation for career pathways.

- 211. COMMENT:** The commenter stated that classroom teaching and morale suffer because of the time, energy, technical resources, and ancillary necessities invested in standardized testing and all the demands that accompany the procedures. **(985)**

**RESPONSE:** The Department expects that the proposed rulemaking will allow school districts to divert resources such as time and talent to better support students' academic needs and to customize their preparation for career pathways.

- 212. COMMENT:** The commenter stated that baseline, midterm, and benchmark assessments are used by educators to fuel classroom instruction. The commenter also stated that the data measures indicate where students need more help and are ready to be challenged, unlike PARCC assessment data, and are more valuable to educators. **(341)**

**RESPONSE:** The Department agrees that formative and benchmark assessments provide more real-time and specific information that a teacher needs to analyze the root cause of a student's academic struggles and to identify learning gaps.

- 213. COMMENT:** The commenter stated that PARCC assessments are killing creativity in the classroom and the growth and discovery that comes from creative thinking. The commenter also stated that mandating PARCC as the primary source of evaluation of students' abilities grossly misrepresents students who best demonstrate their abilities in other modalities. **(96)**

**RESPONSE:** The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

- 214. COMMENT:** The commenter stated that standardized testing narrows a curriculum by eliminating a broad range of crucial learning experiences and also disrupts the school routine by changing schedules and making technology less accessible for weeks. The commenter also stated that PARCC testing causes undue anxiety and caters to students who are able to take tests online. The commenter further stated that students should not be subjected to so many tests from elementary school to high school. **(300)**

**RESPONSE:** The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

- 215. COMMENT:** The commenter stated that PARCC should be limited and school districts' valuable resources should be better spent. **(134)**

**RESPONSE:** The Department expects that the proposed rulemaking will allow school districts to divert resources such as time and talent to better support students' academic needs and to customize their preparation for career pathways.

- 216. COMMENT:** The commenter supported the use of standardized testing with a reduction in time spent on the tests and in the number of tests administered. The commenter also stated that standardized testing is a necessary tool to evaluate student progress, but the length and number of tests have taken away from instructional time. The commenter suggested that standardized testing should reflect a regular class period in length of time up to 60 minutes and include no more than two tests per subject area. The commenter also stated that PARCC assessments have

students in testing areas for more than two hours, which is too stressful for students and causes many of them to lose focus and not perform well. (95)

**RESPONSE:** The Department thanks the commenter for the support, and looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

217. **COMMENT:** The commenter expressed support for the proposed reduction in the number of high school State assessments because students already are tested by classroom teachers on a regular basis. The commenter also stated the amount of time devoted to teaching to the test must be reduced. (2)

**RESPONSE:** The Department thanks the commenter for the support.

218. **COMMENT:** The commenter stated that the cut-score for a passing the PARCC assessment is too high and limiting for students. (1773)

**RESPONSE:** As part of the second phase of outreach and through working groups, the Department will engage stakeholders in conversation about how to most appropriately capture and report the student learning using state assessments, including how cut scores are set.

219. **COMMENT:** The commenter asked why students who pass the Algebra I assessment in middle school are required to take additional mathematics assessments, such as Geometry and Algebra II, in high school. The commenter also asked why ELA assessments are being administered in the earlier grades when 10th grade is the benchmark. (1248)

**RESPONSE:** Federal accountability requires the State to test students once a year in grades three through eight and once in high school in ELA and mathematics. If a student takes Algebra I in middle school and uses the corresponding state assessment to meet the accountability requirement for grade eight, he or she must take a higher-level assessment in high school to meet the Federal accountability requirement for mathematics.

220. **COMMENT:** The commenter questioned the purpose of administering State assessments before high school, stating that assessment results are not supplied with enough time for educators to adjust their lesson plans and instruction to help students who may be struggling. (1248)

**RESPONSE:** Federal accountability requires the state to test students once a year in grades three through eight in ELA and mathematics. The Department maintains that State assessments are only one tool to monitor student progress. Daily assignments and formative and benchmark assessments are instructional tools that provide more real-time and specific information that a teacher needs to analyze the root cause of a student's academic struggles and to identify learning gaps.

221. **COMMENT:** The commenter stated that immediate feedback from assessments is necessary as it is most helpful to students and educators. (2237)

**RESPONSE:** The Department maintains that State assessments are only one tool to monitor student progress. Daily assignments and formative and benchmark assessments are instructional tools that provide more real-time and specific information that a teacher needs to analyze the root cause of a student's academic struggles and to identify learning gaps. Formative assessments, along with strategies that target the learning standards with which a student struggles, can be used to help close learning gaps.

- 222. COMMENT:** The commenter stated that the Department must conduct comprehensive analysis on the value of PARCC and high-stakes testing on teaching and learning, as well as on the psychological and mental health impact of high-stakes testing on students from various communities. **(2)**

**RESPONSE:** The Department appreciates the commenter's input and intends to continue the comprehensive evaluation of New Jersey's State assessment program as the transition to the next generation of State assessments continues.

- 223. COMMENT:** The commenter stated the State assessment system must include an alternate means of ensuring that students with disabilities are not unfairly harmed by high-stakes testing and that all students who graduate are well prepared academically to compete in a post-high school global environment. The commenter also stated the alternative to high-stakes testing should not excuse students from possessing the abilities needed to succeed in employment and post-secondary education. **(2)**

**RESPONSE:** The Department remains committed to considering the needs of all students, including diverse learners, as the proposed rulemaking advances. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting of all types of learners and subgroups of students to ensure students master the knowledge and skills needed to enter the workforce, job training programs, or higher education.

- 224. COMMENT:** The commenter requested that the State Board conduct a comprehensive review and evaluation of the current teacher certification requirements to determine if they are appropriate and effective in predicting teacher success in the classroom and if the requirements have an impact on various racial and ethnic groups. The commenter also requested an examination of the absence of minority teachers in New Jersey schools and the collaborative creation of a strategic plan to educate and certify a more diverse educator corps. **(2)**

**RESPONSE:** The comment is outside the scope of the current rulemaking.

- 225. COMMENT:** The commenter suggested that the Department eliminate high school exit exams and also reduce PARCC assessments across the elementary, middle, and high school levels. The commenter stated that research indicates there is an inherent bias, unfairness, and narrow nature in high-stakes assessments. The commenter also stated that high school exit exams have resulted in higher drop-out rates in other states, are unfair to minority student groups and female students, and are not cost effective. **(2955)**

**RESPONSE:** Federal accountability requires the state to test students once a year in grades three through eight and once in high school in ELA and mathematics. The department intends to continue the comprehensive evaluation of New Jersey's State assessment program to assess how state assessment requirements can best align with post-secondary success.

- 226. COMMENT:** The commenter stated that standardized assessment is not a comprehensive method to demonstrate student achievement and that exit exams rely too heavily on multiple-choice testing and fail to provide an adequate range of methods by which students can demonstrate learning and understanding. The commenter also stated that the State allows alternative-rich assessment techniques, such as portfolios and performance events, but only after a student fails the exit exams. **(2955)**

**RESPONSE:** New Jersey’s State assessments are a single component of the multiple measures that educators utilize to obtain comprehensive insight into students’ overall performance and achievement. The Department intends to continue the comprehensive evaluation of New Jersey’s State assessment program and high school graduation requirements as the transition to the next generation of State assessments continues.

- 227. COMMENT:** The commenters stated that more time should be spent teaching and learning, instead of test preparation and testing. (1425, 1453, 1469, 1523, 2357)

**RESPONSE:** The Department is committed to reducing the number of hours students spend taking State assessments, which will increase instructional time throughout the year.

- 228. COMMENT:** The commenter stated that test preparation fails to teach students to think critically and to collaboratively solve problems. (1239)

**RESPONSE:** The Department is committed to ensuring that all students have access to high-quality instruction and to reducing the number of hours students spend taking State assessments will increase instructional time throughout the year.

- 229. COMMENT:** The commenter stated that high-stakes testing interferes with students’ curiosity and thinking, and shifts the focus in a classroom from learning a subject to memorizing it to pass standardized assessments. (1469)

**RESPONSE:** The Department is committed to ensure that all students have access to high-quality instruction and to reducing the number of hours students spend taking State assessments will increase instructional time throughout the year.

- 230. COMMENT:** The commenter stated that students would be better served if standardized assessments and preparation same were replaced with authentic assessments of individual classroom content. (1486)

**RESPONSE:** In its initial phase of outreach, the Department heard recommendations for the next generation of assessment. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

- 231. COMMENT:** The commenters stated that the administration of PARCC assessments wastes time, money, and resources. (239, 1193, 1266, 1329, 1410, 2237, 2647, 2703)

**RESPONSE:** The Department expects that the proposed rulemaking will allow school districts to divert resources such as time and talent to better support students’ academic needs and to customize their preparation for career pathways.

- 232. COMMENT:** The commenter stated that the money spent on test-prep materials could be used to provide remedial help for students who are functioning below grade-level expectations and more Advanced Placement classes for high-achieving students who might become disaffected with traditional classes. (2930)

**RESPONSE:** The Department expects that the proposed rulemaking will allow school districts to divert resources such as time and talent to better support students’ academic needs and customize their preparation for career pathways.

- 233. COMMENT:** The commenter stated that curricular subjects that are not part of the standardized assessments are devalued in schools. **(2541)**

**RESPONSE:** New Jersey's broad student learning standards and graduation course requirements are intended to support a rich set of learning experiences for each student. The Department monitors instruction and programming in school districts on a three-year cycle through QSAC.

- 234. COMMENT:** The commenter stated that PARCC assessments have disrupted instructional time and the PARCC results and data has not informed or guided classroom instruction. **(1339)**

**RESPONSE:** State assessments are a valuable tool for understanding student performance and are mandated by State and Federal law. However, the Department is committed to transitioning assessments in a way that will be further informed by best State practices and research and will minimize unnecessary disruption for students. The Department looks forward to the second phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders regarding various aspects of the next generation of assessments, including testing times and format.

- 235. COMMENT:** The commenter suggested that the Department select a State assessment that allows students to choose from several reading selections. **(1340)**

**RESPONSE:** The Department remains committed to considering the needs of all students as the proposed rulemaking advances. In its initial phase of outreach, the Department heard recommendations for the next generation of assessment. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

- 236. COMMENT:** The commenter stated that students who do not have regular access to computers and electronic devices at home are at a disadvantage when it comes to computer-administered PARCC assessments. The commenter stated that the PSAT and SAT are far more accessible for students. **(11)**

**RESPONSE:** During the first phase of the outreach process, the Department heard from individuals both in favor of technology-based assessments and opposed to them. Technology-based State assessments align with the NJSLs, which describe what students need to know across core content areas including mathematics and ELA, as well as the skills and knowledge that cut across content areas such as technology, life skills, and career readiness. When New Jersey first administered a technology-based assessment in 2015, 99.4 percent of students successfully completed the assessment using a computer. The technology and infrastructure in school districts around the State has improved since 2015 and student accessibility to devices and technology has grown significantly. To help provide equitable access to technology across the State, the Department will continue to offer technical support and will work to ensure all school districts are equipped with the level of technology necessary to support learning in the 21<sup>st</sup> century. Furthermore, technology-based assessments are becoming the norm in state assessment programs nationwide; both the SAT and ACT are currently developing computer-based assessments.

- 237. COMMENT:** The commenter stated that exposure and access to computers and technology should be considered in developing and implementing assessments. The commenter also stated that students who have not had access to technology are at a disadvantage and are likely to perform at a lower level than students who have been exposed to technology and are more likely to know how to manipulate the functions necessary to successfully complete the assessments. **(2)**

**RESPONSE:** Throughout this first phase of assessment outreach, the Department heard from individuals both in favor of and opposed to technology-based assessments. Technology-based State assessments align with the NJSLs, which describe what students need to know across core content areas including mathematics and ELA, as well as the skills and knowledge that cut across content areas such as technology, life skills, and career readiness. Technology-based assessments are becoming the norm in state assessment programs nationwide. To help provide equitable access to technology across the State, the Department will continue to offer technical support and will work to ensure all school districts are equipped with the level of technology necessary to support learning in the 21<sup>st</sup> century.

- 238. COMMENT:** The commenter stated that an eight-year-old student should not be spending eight days of class time sitting in front of a computer. The commenter further stated that third graders do not have the attention span to work for more than an hour straight on an assessment that has very little influence or effect on their education and personal growth. **(1520)**

**RESPONSE:** During the first phase of the outreach process, the Department heard from individuals both in favor of technology-based assessments and opposed to them. Technology-based State assessments align with the NJSLs, which describe what students need to know across core content areas including mathematics and ELA, as well as the skills and knowledge that cut across content areas such as technology, life skills, and career readiness.

The Department is shortening each State assessment by approximately 25 percent for the spring 2019 administration. The Department remains committed to considering the needs of all students, including young learners, as the proposed rulemaking advances. The Department looks forward to its second phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders regarding various aspects of the next generation of assessments, including testing times and format.

- 239. COMMENT:** The commenter stated that computerized assessments are problematic for students as many complain of ocular pain and headaches after extended screen time as a result of the lengthy assessments. **(2541)**

**RESPONSE:** During the first phase of the outreach process, the Department heard from individuals both in favor of technology-based assessments and opposed to them. Technology-based State assessments align with the NJSLs, which describe what students need to know across core content areas including mathematics and ELA, as well as the skills and knowledge that cut across content areas such as technology, life skills, and career readiness.

The Department is shortening each State assessment by approximately 25 percent for the spring 2019 administration. The Department looks forward to its second phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders regarding various aspects of the next generation of assessments, including testing times and format.

- 240. COMMENT:** The commenter stated that the computerized, timed format of the PARCC assessments increases students' stress levels, which many contribute to student performance on the assessments. **(1232)**

**RESPONSE:** During the first phase of the outreach process, the Department heard from individuals both in favor of technology-based assessments and opposed to them. Technology-based State assessments align with the NJSLs, which describe what students need to know

across core content areas including mathematics and ELA, as well as the skills and knowledge that cut across content areas such as technology, life skills, and career readiness.

The Department is shortening each State assessment by approximately 25 percent for the spring 2019 administration. The Department looks forward to its second phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders regarding various aspects of the next generation of assessments, including testing times and format.

- 241. COMMENT:** The commuter stated that PARCC assessments place roadblocks on many students' paths toward success and growth, and the Department must implement an assessment system that serves and supports all students. **(1070)**

**RESPONSE:** The Department agrees that New Jersey's State assessments need to evolve and to strengthen their role as an instructional tool. The Department remains committed to considering the needs of all students, including diverse learners, as the proposed rulemaking advances. The proposed amendments would reduce the number of required high school State assessments and would extend the alternate competency assessment options for the class of 2021 and beyond. In its initial phase of outreach, the Department heard recommendations for the next generation of assessment. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

- 242. COMMENT:** The commenter stated that tests should be normed and validated with all racial and ethnic populations from inclusive demographics. **(2)**

**RESPONSE:** The Department remains committed to considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard recommendations for the next generation of assessment. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

- 243. COMMENT:** The commenter stated that standardized assessments are often biased and do not provide a complete understanding of the strengths, learning needs, and potential of each student. The commenter stated that more resources and efforts must be provided to supporting teachers so they can tailor their teaching to students' needs and build on each student's strengths. **(1933)**

**RESPONSE** The Department remains committed to considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard recommendations for the next generation of assessment. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

- 244. COMMENT:** The commenter stated that PARCC is not a valid assessment tool due to numerous flaws, including visual presentation, developmental inappropriateness of the content, and delineation of the cut-off scores. The commenter also stated that the score reports provide less useful information about a student's strengths and weaknesses than previous State assessments, explaining that there is no breakdown of skills and concepts that would be helpful to inform instructional decisions. The commenter further stated that assessment fails to capture proficiency demonstrated in the classroom by students while reporting proficiency in other areas even though it is not demonstrated in the classroom by students. **(1218)**

**RESPONSE:** New Jersey's State assessments are a single component of the multiple measures that educators utilize to obtain comprehensive insight into students' overall performance and achievement. The Department intends to continue the comprehensive evaluation of New Jersey's State assessment program and high school graduation requirements as the transition to the next generation of State assessments continues.

- 245. COMMENT:** The commenter stated that there is ample evidence of the deleterious effects of assessing student learning via the PARCC assessments because they do not ask the right questions in an appropriate way to gauge students' true college and career readiness. The commenter also stated that the documented grading errors across the country and large data errors calls into question PARCC's validity. **(1232)**

**RESPONSE:** New Jersey's State assessments are a single component of the multiple measures that educators utilize to obtain comprehensive insight into students' overall performance and achievement. The Department intends to continue the comprehensive evaluation of New Jersey's State assessment program and high school graduation requirements as the transition to the next generation of State assessments continues.

- 246. COMMENT:** The commenter questioned the validity of the PARCC assessments because the cut score for Performance Levels 1, 2, and 3 remain the same year after year, but the score for Performance Level 5 is on a sliding scale each year, which ensures that only a certain percentage of students are in the top proficiency level. **(1864)**

**RESPONSE:** The Department clarifies that the current cut score for Performance Level 1 is 620, Performance Level 2 is 700, Performance Level 3 is 725, and Performance Level 4 is 750, which are the same across all subjects and grade levels. The cut score for Performance Level 5 varies by each grade level and subject, but the cut score itself does not change from year to year.

- 247. COMMENT:** The commenter stated that research indicates that high-stakes testing does not improve the education level of graduates, but narrows the curriculum for struggling students and often prevents them from taking vocational school or professional courses that would better prepare students for life beyond high school. The commenter also stated that testing results in the loss of hundreds of hours of instructional time. **(480)**

**RESPONSE:** The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

- 248. COMMENT:** The commenter stated that PARCC assessments do not accommodate students with disabilities and fail to consider the dexterity of young students who may not be developmentally prepared for using a keyboard to take a test. **(2943)**

**RESPONSE:** The Department remains committed to considering the needs of all students, including diverse learners, as the proposed rulemaking advances. As the Department is transitioning to the next generation of its State assessment system, the Department is committed to ensuring students with diverse needs have assessments that provide actionable data and students are provided the accommodations as required by their IEPs. The Department looks forward to collaborating with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

- 249. COMMENT:** The commenter stated that the PARCC assessments are unfair and discriminatory to students who have learning disabilities. The commenter also stated that a student who has a

learning disability due to a health condition might not be able to take the PARCC assessment on a computer. The commenter further stated the paper version of PARCC is usually given at a different time and requires the student to miss classes and make up missed work, which can cause even more stress for a student. **(912)**

**RESPONSE:** The Department remains committed to considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard recommendations for how to improve assessment implementation and structures such as best practices for scheduling. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

- 250. COMMENT:** The commenter stated that PARCC assessments are not appropriate for students with learning disabilities. **(2970)**

**RESPONSE:** As the Department is transitioning to the next-generation State assessment system, the Department is committed to ensuring that students with diverse needs have assessments that provide actionable data and are provided the necessary accommodations identified in their IEPs and 504 plans so students have the tools necessary to be successful and show their growth on the skills being assessed. The Department looks forward to its second phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders on critical questions regarding what types of high school graduation requirements best inform students, educators, and school communities about whether students have mastered the skills and knowledge they need to advance beyond high school

- 251. COMMENT:** The commenters stated that PARCC assessments are unfair to students with disabilities. **(2074, 2169, 2239)**

**RESPONSE:** The Department is committed to ensuring that students with diverse needs have assessments that provide actionable data and are provided the necessary accommodations identified in their IEPs and 504 plans so students have the tools necessary to be successful and show their growth on the skills being assessed. In its initial phase of outreach, the Department heard recommendations for the next generation of assessment. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

- 252. COMMENT:** The commenter stated that administration of PARCC assessments impacts the provision of special education services because pulling students out of the classroom for related services decreases, testing children referred to the child study team and IEP conferences are delayed, and training for staff on updates in special education is halted. **(1411)**

**RESPONSE:** State assessments are a valuable tool for understanding student performance and are mandated by State and Federal law. However, the Department is committed to transitioning to a new State assessment system in a way that will be further informed by best State practices and research and will minimize unnecessary disruption for students. The Department looks forward to its second phase of assessment outreach and engagement, during which the Department will collect input from education stakeholders regarding various aspects of the next generation of assessments, including testing times and format.

- 253. COMMENT:** The commenter stated that all forms of learning must be supported and that all children learn differently. The commenter also stated that encouraging the children's potential is more important than the outcome of PARCC assessments. **(2365)**

**RESPONSE:** Department agrees that encouraging children and enabling them to reach their fullest potential is a critical goal for all educators and remains committed to setting high expectations for all students while considering the needs of diverse learners. In its initial phase of outreach, the Department heard recommendations for how to improve state assessment implementation. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting of all types of learners.

- 254. COMMENT:** The commenter stated that standardized assessments lack the validity to provide reliable information to make decisions about students, especially students with disabilities. The commenter stated that the Department's proposed amendments may be better than the present assessment system, but they will still do great harm to teachers, students, and parents. The commenter stated that there are far better and cheaper ways to accomplish quality accountability. **(1783)**

**RESPONSE:** The Department appreciates the commenters' acknowledgement that the proposed amendments would improve the State assessment system, and maintains that the proposal keeps high-quality standards in place while addressing, in a targeted way, potential negative impacts on students. New Jersey's State assessments are a single component of the multiple measures that educators utilize to obtain comprehensive insight into students' overall performance and achievement. State assessments also serve as an important piece of the State's multiple school and school district accountability systems, which are used to identify where the State and school districts should concentrate its resources and supports to best meet students' educational needs. The Department looks forward to further collaboration with stakeholders to determine what types of assessments will best serve all New Jersey students, including diverse learners.

- 255. COMMENT:** The commenters stated that the requirement for students to pass PARCC assessments to graduate high school is especially unfair to students with disabilities. **(1791, 1862)**

**RESPONSE:** The Department remains committed to considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard recommendations for the next generation of assessment. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

- 256. COMMENT:** The commenter stated that special education students should be exempt from State assessments. **(2564)**

**RESPONSE:** Federal law allows New Jersey to use an alternative assessment for only one percent of the entire student population and requires all other students to take an assessment at their current grade level. The Department's proposed amendments to N.J.A.C. 6A:8-3.1(a)4, which makes district boards of education responsible for developing educational programs aligned with the NJSLS with appropriate accommodations, instructional adaptations, and/or modifications as determined by the IEP or 504 team for all students with disabilities, specifies that district boards of education are required to provide individualized accommodations, instructional adaptations, and/or modifications for students with disabilities that are specified in a student's IEP or 504 plan. The proposed amendments will further clarify that a student's IEP or 504 plan establishes the individualized accommodations, instructional adaptations, and/or modifications that a district board of education must provide.

**257. COMMENT:** The commenter stated that student with disabilities who are unable to take PARCC assessments due to their disabilities are forced to replace the assessments with Dynamic Learning Maps (DLM), which is an insult to the students' capabilities. The commenter stated that students unable to take PARCC should instead be taking an assessment designed to screen what they have learned. **(1182)**

**RESPONSE:** The Department appreciates the commenter's input. The Department remains committed to maintaining high expectations for all students, complying with federal requirements and most importantly, considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard recommendations for how to improve assessment implementation and structures such as best practices for scheduling. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

**258. COMMENT:** The commenter stated that there are many problems with proper administration of the PARCC assessments, including provision of technological devices and meeting the needs of students with IEPs and 504 plans. **(1556)**

**RESPONSE:** The Department remains committed to considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard recommendations for how to improve assessment implementation and structures such as best practices for scheduling. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

**259. COMMENT:** The commenter stated that the Department should clarify that a student's IEP or 504 plan should establish the individualized accommodations, instructional adaptations, and/or modifications that must be provided for standardized assessments because under the current system accommodations available to students with IEPs and 504 Plans may not be available to them during PARCC assessments. **(1070)**

**RESPONSE:** The Department's proposed amendments to N.J.A.C. 6A:8-3.1(a)4, which makes district boards of education responsible for developing educational programs aligned with the NJSLS with appropriate accommodations, instructional adaptations, and/or modifications as determined by the IEP or 504 team for all students with disabilities, specifies that district boards of education are required to provide individualized accommodations, instructional adaptations, and/or modifications for students with disabilities that are specified in a student's IEP or 504 plan. The proposed amendments will further clarify that a student's IEP or 504 plan establishes the individualized accommodations, instructional adaptations, and/or modifications that a district board of education must provide.

**260. COMMENT:** The commenter stated that PARCC testing does not provide for the accommodations specified in a student's IEP and, therefore, the student does not receive a passing score on PARCC. The commenter also stated that PARCC can prevent an honors student who uses accommodations and learning supports from being able to graduate high school because of the heavy reliance on PARCC. **(749)**

**RESPONSE:** While transitioning to the next generation of its State assessment system, the Department is committed to ensuring students with diverse needs have assessments that provide actionable data and students are provided the accommodations as required by their IEPs or 504

plans. The Department looks forward to collaborating with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

- 261. COMMENT:** The commenter urged the State Board to support the proposed amendments that will reduce the number of high school State assessment because special education students are subjected to taking State assessments that do not conform to the accommodations required in their IEPs. **(708)**

**RESPONSE:** The Department thanks the commenter for the support.

- 262. COMMENT:** The commenter stated that PARCC seriously disrupts instruction and educational services for all students, especially ELLs and students with disabilities. **(1604)**

**RESPONSE:** The Department remains committed to considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard recommendations for how to improve assessment implementation and structures such as best practices for scheduling. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

- 263. COMMENT:** The commenters stated that the PARCC assessments are particularly stressful for students with disabilities and ELLs. **(2757, 2847)**

**RESPONSE:** The Department remains committed to considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard excellent recommendations for the next-generation assessment, including assessment implementation. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting of all types of learners.

- 264. COMMENT:** The commenter stated that ELLs are over-tested because they are required by law to demonstrate English language growth on the ACCESS for ELLs assessment. **(1313)**

**RESPONSE:** Under Federal law, all states are required to administer the same assessments to all students in ELA and mathematics in grades three through eight and once in high school and to administer English proficiency assessments to ELLs. The Department's proposed amendments at N.J.A.C. 6A:8-4.1(d)1ii align with Federal law and current rules for elementary and middle school students and allow first-year ELLs to substitute a Department-approved English language proficiency test for the State ELA 10 assessment. Under the Department's proposal, N.J.A.C. 6A:8-4.1(d)1ii(1) further allows students who substituted the Department-approved English language proficiency test for the State ELA 10 assessment to be exempt from the graduation requirement that students must first take the State ELA 10 assessment to access alternative pathways for meeting the ELA graduation assessment requirement. The Department remains committed to considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard recommendations for how to improve assessment implementation and structures such as best practices for scheduling. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

- 265. COMMENT:** The commenter suggested that ELLs should be exempt from taking another assessment such as PARCC when they are already required to take a yearly standardized assessment to show their improvement. **(1736)**

**RESPONSE:** The Department's proposed amendments at N.J.A.C. 6A:8-4.1(d)1ii align with Federal law and current rules for elementary and middle school students and allow first-year ELLs to substitute a Department-approved English language proficiency test for the State ELA 10 assessment. Under the Department's proposal, N.J.A.C. 6A:8-4.1(d)1ii(1) further allows students who substituted the Department-approved English language proficiency test for the State ELA 10 assessment to be exempt from the graduation requirement that students must first take the State ELA 10 assessment to access alternative pathways for meeting the ELA graduation assessment requirement. The Department remains committed to considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard recommendations for how to improve assessment implementation and structures such as best practices for scheduling. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

- 266. COMMENT:** The commenter stated that requiring ELLs to take PARCC assessments is unfair because it does not measure their knowledge of the subject. The commenter further stated that it is also unfair to require ELLs who been in this country for less than a year to take the math portion of the assessment. **(1416)**

**RESPONSE:** The Department's proposed amendments at N.J.A.C. 6A:8-4.1(d)1ii align with Federal law and current rules for elementary and middle school students and allow first-year ELLs to substitute a Department-approved English language proficiency test for the State ELA 10 assessment. Under the Department's proposal, N.J.A.C. 6A:8-4.1(d)1ii(1) further allows students who substituted the Department-approved English language proficiency test for the State ELA 10 assessment to be exempt from the graduation requirement that students must first take the State ELA 10 assessment to access alternative pathways for meeting the ELA graduation assessment requirement. The Department remains committed to considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard recommendations for how to improve assessment implementation and structures such as best practices for scheduling. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

- 267. COMMENT:** The commenter stated that the PARCC assessments are very language heavy, so ELLs can have difficulty with the mathematics assessment due to English proficiency. The commenter further suggested that ELLs be excused from taking PARCC assessments for their first three years after arriving in the United States because of the numerous other required assessments, which result in disruption to ELLs' instruction and causes undue stress. **(2049)**

**RESPONSE** Under Federal law, all states are required to administer the same assessments to all students in ELA and mathematics in grades three through eight and once in high school and to administer annually English proficiency assessments to ELLs. The Department's proposed amendments at N.J.A.C. 6A:8-4.1(d)1ii, align with Federal law and current rules for elementary and middle school students and allow first-year ELLs to substitute a Department-approved English language proficiency test for the State ELA 10 assessment. Under the Department's proposal, N.J.A.C. 6A:8-4.1(d)1ii(1) further allows students who substituted the Department-approved English language proficiency test for the State ELA 10 assessment to be exempt from the graduation requirement that students must first take the State ELA 10 assessment to access

alternative pathways for meeting the ELA graduation assessment requirement. The Department remains committed to considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard recommendations for how to improve assessment implementation and structures such as best practices for scheduling. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

- 268. COMMENT:** The commenter stated that the Department must consider the inequity in assessments for English language learners (ELLs). **(2429)**

**RESPONSE:** As the Department is transitioning to the next generation of its State assessment system, the Department is committed to considering the needs of all students, including diverse learners, and ensuring students with diverse needs have assessments that provide actionable data. The Department looks forward to collaborating with stakeholders to determine what types of assessments will best serve New Jersey students and educators moving forward.

- 269. COMMENT:** The commenter stated that recently arrived ELLs should not be forced to sit through a test that they likely will not pass. **(1347)**

**RESPONSE:** The Department's proposed amendments at N.J.A.C. 6A:8-4.1(d)1ii align with Federal law and current rules for elementary and middle school students and allow first-year ELLs to substitute a Department-approved English language proficiency test for the State ELA 10 assessment. Under the Department's proposal, N.J.A.C. 6A:8-4.1(d)1ii(1) further allows students who substituted the Department-approved English language proficiency test for the State ELA 10 assessment to be exempt from the graduation requirement that students must first take the State ELA 10 assessment to access alternative pathways for meeting the ELA graduation assessment requirement. The Department looks forward to further collaboration with stakeholders to determine what types of assessments will best serve all New Jersey students, including diverse learners.

- 270. COMMENT:** The commenter asked how will first-year ELLs demonstrate attainment of State standards in reading and writing as required by State law, which differs from attainment of English language proficiency, if first-year ELLs are exempted from ELA 10. **(8)**

**RESPONSE:** Federal law allows ELLs who are in their first-year in the country to be exempt from the State assessment in ELA. This was something New Jersey proposed for high school students according to Option 1 of Sec. 1111 in the ESSA State Plan based on a large quantity of stakeholder feedback. The Department agrees with this policy because it allows newcomers the time they need to acquire English language proficiency before taking a graduation assessment. ELLs with low proficiency have a less than a 0.5 percent chance of passing the State assessment. Even if they are at grade level in their native language, first-year ELLs are generally still in the process of learning the English necessary to be able to understand grade-level language arts content in English. Students will still be required to meet the ELA graduation assessment requirement by taking an assessment on the menu of substitute competency tests or completing a portfolio appeal. This policy, however, will allow them to have time to grow in their English language proficiency before they must sit for that graduation test.

- 271. COMMENT:** The commenter stated that the PARCC assessments are written in extreme linguistic complexity, which is not appropriate for ELLs. The commenter suggested that proper accommodations should include digital bilingual dictionaries, glossaries, more visuals, simplified

directions, additional time, read-aloud directions, etc., and provide an assessment in student's native language. (1070)

**RESPONSE:** In its initial phase of outreach, the Department heard recommendations for the next generation of assessment. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

272. **COMMENT:** The commenter stated that standardized tests such as PARCC illustrate the bias between economically disadvantaged students and students from affluent families. (2265)

**RESPONSE:** The Department remains committed to maintaining high expectations for all students, complying with Federal requirements, and, most importantly, considering the needs of all students, including diverse learners, as the proposed rulemaking advances. New Jersey's State assessment has undergone the federally mandated peer-review process, which confirms that the assessment is a reliable and valid measure of all students' progress toward State standards. An important distinction in assessment results demonstrating significant academic gaps among different socioeconomic groups is that while performance results may correlate with differences among subgroups, performance results do not provide causal information. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting on all types of learners and subgroups of students.

273. **COMMENT:** The commenter stated that standardized test scores correlate very strongly to the socio-economic status of students' families. (1253)

**RESPONSE:** The Department remains committed to maintaining high expectations for all students, complying with Federal requirements, and, most importantly, considering the needs of all students, including diverse learners, as the proposed rulemaking advances. An important distinction in assessment results demonstrating significant academic gaps among different socioeconomic groups is that while performance results may demonstrate a correlation among groups, performance results do not provide causal information. In its initial phase of outreach, the Department heard recommendations for the next generation of assessment. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

274. **COMMENT:** The commenter stated that standardized assessments are not equitable as students with socioeconomic advantages have tutors and after-school programs to help students perform well on assessments. (1453)

**RESPONSE:** The Department remains committed to maintaining high expectations for all students, complying with Federal requirements, and, most importantly, considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard recommendations for the next generation of assessment. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

275. **COMMENT:** The commenter stated that standardized assessments punish students from lower socio-economic backgrounds and their teachers. (1192)

**RESPONSE:** The Department remains committed to maintaining high expectations for all students, complying with Federal requirements, and, most importantly, considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard recommendations for the next generation of assessment. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

- 276. COMMENT:** The commenter stated that standardized testing harms students from low-income and racial minority backgrounds. **(1766)**

**RESPONSE:** The Department remains committed to maintaining high expectations for all students, complying with Federal requirements, and, most importantly, considering the needs of all students, including diverse learners, as the proposed rulemaking advances. In its initial phase of outreach, the Department heard recommendations for the next generation of assessment. The Department looks forward to the next phase of engagement and outreach to continue collaborating with stakeholders to continually improve assessment and data reporting for all types of learners.

- 277. COMMENT:** The commenter opposed the proposed amendments to N.J.A.C. 6A:8. **(2977)**

**RESPONSE:** The Department appreciates the commenter's input.

- 278. COMMENT:** The commenter expressed opposition to the proposed amendments to N.J.A.C. 6A:8 and urged the Department not to lower the standard for high school graduation or across the board. **(2976)**

**RESPONSE:** The Department's proposal retains the graduation assessment requirements at ELA 10 and Algebra I and maintains the State's high-quality academic standards. The proposal targets a complex regulation that has unintended consequences: N.J.A.C. 6A:8-5.1(f). The Department is proposing to extend access to an alternative competency test, as determined by the Commissioner, or the portfolio appeals process to students in the class of 2021 and beyond who take but do not pass the Algebra I and/or ELA 10 assessment without additional State testing. Alternative means of demonstrating proficiency in ELA 10 and Algebra I and cut scores, as well as the portfolio appeals process and its alignment to the NJSLs, will be revisited as part of the second phase of assessment outreach and engagement. During the second phase, the Department will collect input from education stakeholders on critical questions regarding what types of high school graduation assessment requirements best inform students, educators, and school communities about whether students have mastered the skills and knowledge they need to advance beyond high school.

- 279. COMMENT:** The commenter welcomed the continued discussion of the proposed amendments to N.J.A.C. 6A:8 with the Department and the State Board. The commenter suggested inviting stakeholders to collectively develop a plan that works for all students, ensuring that the interests of disadvantaged students are being protected. **(2975)**

**RESPONSE:** The Department appreciated the widespread engagement of stakeholders in the initial phase of its outreach and looks forward to collaborating with all interested stakeholders at the next phase of engagement. Like the commenter, the Department remains committed to identifying ways to eliminate gaps among student groups in academics and reducing inequities in college and career opportunities. Data from the New Jersey's School Performance Reports show that school leaders across the State are addressing in-school or in-school district gaps with

varying degrees of success. The Department remains committed to using data and carrying out New Jersey's ESSA State Plan to identify schools that need additional comprehensive and targeted support based, in part, on subgroup performance. A key aspect of the Department's support starts with helping schools conduct comprehensive needs assessments and root cause analyses so that once gaps are identified, schools can dig deeper into data to identify root causes and then implement best practices to work toward closing achievement gaps. The Department will also use data to identify schools and school districts that are meeting the needs of diverse learners so they may share their best practices with other schools and school districts.

To build a stronger and fairer New Jersey education system, the Department is committed to working in partnership with educators and families in school districts across the State to build a coherent system of aligned academic standards and assessments meant to support *all* students and to provide them with equitable paths to post-secondary success.

- 280. COMMENT:** The commenters requested that the Department involve educators and include their input in the outreach process for transitioning to the next-generation of assessments. **(1393, 2818)**

**RESPONSE:** The Department looks forward to the next phase of engagement and outreach to continue to collaborate with stakeholders, including educators, to determine what types of assessments will best serve New Jersey students and educators moving forward.

- 281. COMMENT:** The commenter stated that the Department's policy decisions and proposals should be based on data and facts, with the goal of achieving student success. The commenter also stated that the Department should propose a final solution, not an intermediary step. **(2975)**

**RESPONSE:** The Department's proposed amendments maintain New Jersey's high-quality academic standards and assessment system; immediately remedy a policy with the potential to negatively affect the class of 2020 and beyond; and eliminate assessments that divert valuable resources such as time and talent without providing actionable data for families or educators. The Department looks forward to collaborating with all interested stakeholders in its next phase of engagement to assess whether the current graduation assessment requirements adequately promote student achievement and indicate student preparedness for life after graduation and to determine what types of assessments will best serve New Jersey students moving forward.

- 282. COMMENT:** The commenter expressed concern that the Department's assessment outreach summary of findings report contained little data on student achievement and the progress made in closing the achievement gap over the past several years. The commenter stated that assessments are vital tools that allow the Department to ensure that every student's needs are being met. The commenter stated that the Department has a long way to go in closing the achievement gap between students of color, low-income students, and their peers. **(25)**

**RESPONSE:** The intent of the first phase of assessment outreach was to better understand the concerns and values of stakeholders across New Jersey related to the State assessment program. Phase one of outreach supported the development of a general framework for the next generation of State assessments, which will be used as the foundation for further stakeholder engagement opportunities in phase two. This second phase of outreach is expected to begin in the fall of 2018 and continue through the summer of 2019. Phase two will explore the more nuanced aspects of the feedback obtained through phase one and will support the continued development of specifications for the next generation of State assessments.

The Department remains committed to closing the achievement gaps and to working in partnership with educators and families in school districts across the State to build a coherent system of aligned academic standards and assessments meant to support *all* students and to provide them with equitable paths to post-secondary success. As an initial step in building this system, the Department collected recommendations during a two-month, 21-county tour in which the Commissioner and staff held approximately 75 in-person sessions and heard from students, teachers, school administrators, education advocates, and community leaders.

Data and evidence show that while the State needs to maintain high standards, a great deal of improvement is urgently necessary. The Department's proposal is one interim step in its efforts to expand post-secondary options for all the students in New Jersey. The Department's proposed amendments are designed to improve clarity and avert the unintended consequences of current graduation assessment policy. The Department believes that the current requirements will increase the opportunity gaps among students as the current requirements limit the access of students who fail Algebra I and/or ELA 10 to the menu of alternative assessment options, such as SAT, ACT, ACCUPLACER, or ASVAB-AFQT, which have meaningful alignment to post-secondary outcomes.

- 283. COMMENT:** The commenter stated that the process of adopting the proposed amendments seems rushed and the proposed amendments require additional vetting. The commenter stated that the timing of the proposed amendments coincided with the exact time of the summary of findings report, which did not allow for stakeholder analysis in a comprehensive way. The commenter also stated that the most recent PARCC scores should be announced to allow the State Board and stakeholders the opportunity to see the results before changes are made to the State assessment system. **(25)**

**RESPONSE:** The Department maintains that the sustentative outreach and concurrent analysis of the State assessment system support the State Board in moving forward with the targeted amendments. As an initial step in building this system, the Department collected recommendations during a two-month, 21-county tour in which the Commissioner and staff held approximately 75 in-person sessions and heard from students, teachers, school administrators, education advocates, and community leaders. The recommendations provided preliminary information about how the Department might best build a coherent system of aligned academic standards and assessments meant to support *all* students and to provide them with equitable paths to post-secondary success. The Department's targeted proposal maintains New Jersey's high expectations for, and accountability to, all students and continues to provide actionable data to communities, while addressing the unintended consequences of the current rules for students. The Department has provided the State Board and the public with an extensive summary of findings from the initial outreach, the instructional, research-based justifications, and the overview of all spring 2018 State assessment results. Finally, the Department re-iterates the urgency and importance of this proposal. More than 65,000 students from the class of 2017 were not able to use Algebra I and/or ELA 10 to fulfill their assessment graduation requirements. The data show that the classes of 2020 and 2021 are on a very similar path. Under current graduation assessment rules, the students will all have to take -- but not to pass -- all additional end-of-course State assessments (ELA 9, ELA 11, Algebra II, and Geometry) before they can complete a portfolio appeals process, which consists of a series of performance tasks that a school district designs and submits to the Department. The students are not able to use the menu of alternative assessment options, such as SAT, ACT, ACCUPLACER or ASVAB-AFQT, which have meaningful alignment to post-secondary outcomes.

The Department appreciates the commenter's feedback and looks forward to continuing discussions regarding the proposed rulemaking with all stakeholders, including the State Board. The 2018 PARCC assessments results will be made available by the second week of October.

- 284. COMMENT:** The commenter stated that teacher effectiveness cannot be appropriately evaluated based on how well students perform on PARCC assessment. **(2621, 1506, 1859, 2240)**

**RESPONSE:** The comment is outside the scope of the current rulemaking. Educator evaluations and their required components are governed by N.J.A.C. 6A:10.

- 285. COMMENT:** The commenter requested that the Department eliminate student growth objectives (SGOs) for teachers. **(1544)**

**RESPONSE:** The comment is outside the scope of the current rulemaking. Educator evaluations and their required components are governed by N.J.A.C. 6A:10.

- 286. COMMENT:** The commenter requested that the Department reduce the value placed on PARCC assessment results in educator evaluations for teachers of students with disabilities. **(1884)**

**RESPONSE:** The comment is outside the scope of the current rulemaking. Educator evaluations and their required components are governed by N.J.A.C. 6A:10.

- 287. COMMENT:** The commenter thanked the Commissioner for reducing the use of State assessments scores in educator evaluation. **(6)**

**RESPONSE:** The comment is outside the scope of the current rulemaking. Educator evaluations are governed by N.J.A.C. 6A:10 rather than N.J.A.C. 6A:8.

- 288. COMMENT:** The commenter stated it is unfair to base educators' evaluations on students' State assessment results because high school students have been observed not taking the State assessments seriously because they are perceived to be a waste of time. **(302)**

**RESPONSE:** The comment is outside the scope of the current rulemaking. Educator evaluations are governed by N.J.A.C. 6A:10 rather than N.J.A.C. 6A:8.

- 289. COMMENT:** The commenter stated that providing a real education to students is more challenging than ever due to the distractions and paperwork required for educator evaluations, even for teachers whose evaluations do not include standardized test results, because of the endless hours spent SGOs along with relatively meaningless current evaluation standards that use instruments intended for teacher growth rather than stakes evaluation and the vast diversity of students in our schools. **(985)**

**RESPONSE:** The comment is outside the scope of the current rulemaking. Educator evaluations are governed by N.J.A.C. 6A:10 rather than N.J.A.C. 6A:8.

October 3, 2018

TO: Members, State Board of Education

FROM: Lamont O. Repollet, Ed.D.  
Commissioner

SUBJECT: N.J.A.C. 6A:8, Standards and Assessment

REASON  
FOR ACTION: Amendments

AUTHORITY: N.J.S.A. 18A:7A-10 through 14, 18A:7C-1 et seq., 18A:7E-2 through 5,  
18A:35-4.2 and 4.7, and 18A:59-5.

SUNSET DATE: May 3, 2025

### Summary

The Department of Education (Department) proposes to amend N.J.A.C. 6A:8, Standards and Assessment. The chapter, which implements the New Jersey Student Learning Standards (NJSLS), the Statewide assessment system, and State high school graduation requirements, is being revised to reflect the Department's transition to a next generation of State assessments. As a part of this transition, the Department proposes to simplify graduation requirements and to clarify assessment requirements for English language learner (ELL) students and students with disabilities.

The proposed amendments are informed by extensive stakeholder feedback gathered through its first phase of Statewide assessment outreach. The first phase allowed Department staff to gather insights from representatives with diverse educational perspectives and firsthand knowledge of the realities of test administration, including students, parents, teachers, administrators, district board of education members, and community organizations in every county. The Department is committed to transitioning assessments in a way that will be further informed by best state practices and research and will minimize unnecessary disruption to school districts.

The proposed rulemaking is an interim proposal to streamline the high school assessment system as part of the transition to the next Statewide assessment system. Upon review of the graduation requirements for the classes of 2020 and beyond, the Department found aspects of the current rules to be overly complex and to have an unintended negative consequence for some students, particularly in light of the number of standardized tests administered in high school, including non-State tests such as the PSAT, SAT, ACT, etc. The Department anticipates initiating another rulemaking in the near future to implement the next phase of the assessment system after the full transition plan is formulated in collaboration with stakeholders from across the State.

The Department's proposed amendments maintain the current State assessment requirements in grades three through eight, maintain the current State graduation assessment requirements (Algebra I

and ELA 10), and continue to align the rules with Federal law (the Elementary and Secondary Education Act (ESEA) reauthorized as the Every Student Succeeds Act (ESSA)).

The Department proposes to require the administration of only one State ELA and one mathematics assessment in high school. Six Partnership for Assessment of Readiness for College and Careers (PARCC) end-of-course high school assessments in ELA 9, 10, and 11 and Algebra I, Geometry, and Algebra II were administered in 2017-2018 and previous years under PARCC. This resulted in high school students taking multiple State assessments nearly every year in high school. The Department's proposal streamlines the schedule of testing for high school students, while still ensuring students master the knowledge and skills needed to enter the workforce, job training programs, or higher education.

Thus, under this proposal, students who take the State ELA 10 and Algebra I assessments but do not achieve a passing score on either assessment are immediately eligible to access the additional pathways, including portfolio appeals process, permitted by N.J.A.C. 6A:8-5.1(f). However, the Department will continue to make available the State ELA 10 or Algebra I assessments for students who initially do not achieve a passing score and would like additional opportunities to show mastery of the content through State-administered assessments. Additionally, the Department will ensure that the menu of substitute competency assessments options currently open to the class of 2019 and 2020 remains open to students in the classes of 2020, 2021, 2022, and beyond. The menu of assessment options is in addition to the portfolio appeals process, which students in the class of 2021 and beyond may avail themselves if they do not achieve a passing score on Algebra I and ELA 10 assessments.

As an initial change, the Department proposes to replace most references to the PARCC end-of-course high school assessments and "PARCC" with "State ELA 10 and Algebra I assessments" to reflect the end of the PARCC consortium.

The detailed summary below explains the specific amendments that accomplish the changes outlined above, and other language alterations needed to make the rule cohesive.

## **Subchapter 1. General Provisions**

### **N.J.A.C. 6A:8-1.3 Definitions**

This section provides definitions for words and terms used in the chapter.

The Department proposes an amendment to the definition of "alternative assessment for students with disabilities" to add "State" after "alternative" to clarify that the term references the State-administered alternative assessment for students with disabilities and no other test. The Department also proposes the amendment throughout the chapter, where appropriate. The current alternative State assessment for students with students with disabilities is Dynamic Learning Maps (DLM).

The Department proposes to amend the definition of "PARCC assessment," which means the set of assessments designed by PARCC used to determine student achievement of the knowledge and skills specified by the NJSLs in ELA and mathematics. The Department proposes to replace "used" with "that was used from the 2014-2015 through 2017-2018 school years" since PARCC is no longer the State assessment.

The Department proposes to amend the definition of "portfolio appeals process," which means an alternative assessment of proficiency for graduation established by the Commissioner, utilizing techniques and instruments other than PARCC assessments or substitute competency tests, by replacing "PARCC assessments" with "PARCC ELA 10 or Algebra I assessments, or the State ELA 10 and

Algebra I assessments.” The proposed amendments will clarify that students who demonstrate proficiency on the previous PARCC assessments or the State ELA 10 and Algebra I assessments do not need to use the portfolio appeals process to satisfy the assessment requirement. The same amendment is proposed to the definition of “substitute competency test.”

### **Subchapter 3. Implementation of the New Jersey Student Learning Standards**

#### **N.J.A.C. 6A:8-3.1 Curriculum and instruction**

This section describes a district board of education's responsibility for the design and delivery of curriculum and instruction needed to address the NJSLs. The section also requires a district board of education to ensure that appropriate instructional adaptations are designed and delivered for students with disabilities, ELLs, students enrolled in alternative education programs, and students who are gifted and talented.

The Department proposes to amend N.J.A.C. 6A:8-3.1(a)4, which makes district boards of education responsible for developing educational programs aligned with the NJSLs with appropriate accommodations, instructional adaptations, and/or modifications as determined by the IEP or 504 team for all students with disabilities. The amendment specifies that district boards of education are required to provide individualized accommodations, instructional adaptations, and/or modifications for students with disabilities that are specified in a student's individualized education program (IEP) or 504 plan. The proposed amendments will clarify that a student's IEP or 504 plan establishes the individualized accommodations, instructional adaptations, and/or modifications that a district board of education must provide.

### **Subchapter 4. Implementation of the Statewide Assessment System**

#### **N.J.A.C. 6A:8-4.1 Statewide assessment system**

This section describes the Statewide assessment system linked to the NJSLs.

The Department proposes to amend N.J.A.C. 6A:8-4.1(c), which requires district boards of education to administer the applicable Statewide assessments, including elementary and middle school assessment components and high school end-of-course PARCC assessments, by replacing “high school end-of-course PARCC assessments” with “high school assessment component.” The proposed amendment will mirror the rule's language regarding elementary and middle school assessment components.

The Department proposes to amend N.J.A.C. 6A:8-4.1(c)3, which requires the implementation of a high school assessment program component of NJSLs that assesses, at a minimum, ELA, mathematics, and science, by replacing “high school assessment program component of the NJSLs that assesses, at a minimum,” with “high school assessment component of the Statewide assessment of the NJSLs consisting of one assessment in each of the following subjects.” The Department also proposes to recodify “English language arts, mathematics, and science” as N.J.A.C. 6A:8-4.1(c)3i, ii, and iii. The proposed amendments will mirror the language and structure of the elementary and middle school components of the Statewide assessment at N.J.A.C. 6A:8-4.1(c)1 and 2. The rule, as proposed for amendment, also will align with the Federal assessment requirements in Section 1111(B)(v) of the ESEA. The ESEA requires school districts to administer to high school students one assessment in each of the following subjects: ELA, mathematics, and science. Section 1111(C) of the ESEA provides that for school accountability, a student who takes an assessment such as Algebra I in middle school must take one mathematics end-of-course assessment in high school that is more advanced than the assessment taken in middle school. For example, students who take Algebra I in middle school will be

administered a more advanced assessment such as Geometry in high school for the purposes of measuring school and school district performance and meeting Federal requirements.

The Department also proposes to delete existing N.J.A.C. 6A:8-4.1(c)3i, which carves out an exception that allows students to receive a waiver from the district board of education from taking the high school end-of-course PARCC assessment in ELA 11 due to the student's participation in another English language/literature college placement assessment during the same school year. The Department proposes deleting this exception because the high school end-of-course PARCC assessment in ELA 11 will no longer be administered.

The Department proposes to amend N.J.A.C. 6A:8-4.1(d)1, which requires district boards of education to provide appropriate accommodations or modifications to the Statewide assessment system as specified by the Department for ELLs and students with disabilities as determined by the IEP or 504 team. The Department proposes to add "all" before "appropriate accommodations" and to replace "as determined by the IEP or 504 team" with "specified in a student's IEP or 504 plan" to clarify that a student's IEP or 504 plan establishes the appropriate accommodations and modifications and that district boards of education are required to provide all such accommodations and modifications.

The Department proposes to amend N.J.A.C. 6A:8-4.1(d)1ii, which provides district boards of education with the option to allow a first-year ELL to substitute a Department-approved language proficiency test only for the English language arts section of the elementary or middle school component of the Statewide assessment when the student has entered the United States after July 1 of the calendar year prior to the test administration. The Department proposes to delete "section of the elementary or middle school" after "English language arts" and to replace "July 1" with "June 1." The proposed amendments will apply the rule to first-year ELLs in elementary, middle, or high school and will move up the deadline by one month. The proposed amendments will align the rule to New Jersey's Every Student Succeeds Act (ESSA) State Plan.

The Department proposes N.J.A.C. 6A:8-4.1(d)1ii(1) to allow first-year ELLs to substitute a Department-approved English language proficiency test for the State ELA 10 assessment in accordance with N.J.A.C. 6A:8-4.1(d)1ii. The proposed rule will ensure that ELLs who use this option afforded under ESSA will be able to meet the graduation assessment requirements.

The Department proposes to add N.J.A.C. 6A:8-4.1(d)3iii to state that the Department shall implement an approved English language proficiency assessment to measure the progress in English language proficiency of ELLs who have been determined eligible by the IEP team for an alternative Department-approved English language proficiency assessment for students with disabilities. The proposed amendment will align the section to New Jersey's ESSA State Plan.

### **N.J.A.C. 6A:8-4.3 Accountability**

This section requires specific reporting of annual State assessment results and requires district boards of education to provide appropriate instruction to improve skills and knowledge for students who perform below established proficiency levels on State or local assessments.

The Department proposes to amend N.J.A.C. 6A:8-4.3(a), which requires chief school administrators to report preliminary and final results of annual assessments to district boards of education within 60 days of receipt of information from the Department, by deleting "preliminary and" before "final" because the process for the Department's release of assessment data has changed and it no longer is appropriate for chief school administrators to publicly report preliminary data that may not include all student records. The Department also proposes to add "and members of the public at a public

meeting” after “district boards of education” to ensure the public receives final annual assessment results in a timely manner.

The Department proposes to amend N.J.A.C. 6A:8-4.3(b), which requires district boards of education to provide parents, students, and citizens with annual assessment results, to instead require chief school administrators to provide educators, parents, and students with annual assessment results, as applicable, within 30 days of receipt of the information from the Department. The proposed amendments will ensure that educators, parents, and students receive applicable results in a timely manner and will make chief school administrators responsible for ensuring the information is disseminated.

#### **N.J.A.C. 6A:8-4.5 Public reporting**

This section requires the Department to report annually to the State Board and the public on the progress of all students and student subgroups toward mastery of the NJSLs as measured by the Statewide assessment system, by publishing and distributing the annual New Jersey School Report Card (now called the New Jersey School Performance Reports), without compromising the confidentiality of individual students.

The Department proposes to amend N.J.A.C. 6A:8-4.5(c), which requires the Department to report performance on the alternative performance assessment (APA) with the same frequency and in the same detail as it reports on other Statewide assessments, by replacing “APA” with “alternative State assessment for students with disabilities.” The name of the APA was changed in a previous rulemaking, but this reference was missed at that time.

### **Subchapter 5. Implementation of Graduation Requirements**

#### **N.J.A.C. 6A:8-5.1 Graduation requirements**

This section describes the ways in which students can obtain a high school diploma.

The Department proposes to amend N.J.A.C. 6A:8-5.1(a)6, which requires district board of education graduation policies to include the requirement that all students demonstrate proficiency in the PARCC ELA 10 and Algebra I assessments, or through the alternative means set forth at N.J.A.C. 6A:8-5.1(f) through (i), by removing the reference to “the high school end-of-course PARCC.” The Department also proposes to amend the rule so students will now have to demonstrate proficiency in “assessments in ELA 10 and Algebra I, such as State ELA 10 and State Algebra I” or through the alternative means set forth at N.J.A.C. 6A:8-5.1(f) through (h). The Department proposes the same amendment at N.J.A.C. 6A:8-5.1(a)7.

The Department proposes to amend N.J.A.C. 6A:8-5.1(f), which was adopted in 2015 to phase-in revised graduation assessment requirements by providing alternative means of demonstrating proficiency in ELA 10 and Algebra I. The Department proposes to add language to clarify that students continue to have the opportunity to retake the applicable assessment if the student so chooses.

The Department proposes to amend N.J.A.C. 6A:8-5.1(f)1, which sets forth how specific graduation classes may demonstrate competency through alternative means of assessment. The Department proposes to delete references to the graduating classes of 2016 and 2017, and to maintain the alternative means of demonstrating proficiency for the classes of 2018 and 2019. The Department also proposes amendments to replace “both assessments” with “one or both assessments” to clarify that students in the classes of 2018 and 2019 who did not achieve a passing score on either assessment could access the additional pathways. The assessment graduation requirements and student access to

alternative pathways for the classes of 2018 and 2019 are not being changed; the proposed amendments will ensure that every student in the two graduating classes continues to have access to the additional pathways.

The Department proposes to amend N.J.A.C. 6A:8-5.1(f)1i, which gives students the option of achieving a passing score on a corresponding substitute competency test in English language arts and/or mathematics, by deleting “or substitute a passing score on another end-of-course PARCC assessment, including ELA 9, ELA 11, Geometry, or Algebra II.” The proposed amendment is necessary because the Department will reduce the number of high school ELA and mathematics assessments administered while aligning to the Federal requirement of one ELA and one mathematics assessment in high school. However, students in the classes of 2018 and 2019 can continue to use the ELA 9, ELA 11, Geometry, or Algebra II assessments to demonstrate mastery of ELA or mathematics for graduation purposes because the Department will include the assessments as corresponding substitute competency tests. The same amendment is proposed at N.J.A.C. 6A:8-5.1(f)2i for the classes of 2020 and beyond.

The Department proposes to amend N.J.A.C. 6A:8-5.1(f)2, which allows students in the graduating class of 2020 who take all applicable high school end-of-course PARCC assessments for all courses in which they are enrolled, including those students who received a waiver for ELA 11 pursuant to N.J.A.C. 6A:8-4.1(c)3i, as of September 6, 2016, and thereafter, but do not achieve a passing score on both the ELA 10 and Algebra I end-of-course PARCC assessments to satisfy the State requirement to demonstrate proficiency in ELA and mathematics through additional pathways. The Department proposes to expand the rule to classes beyond 2020. The Department also proposes to replace “take all applicable high school end-of-course PARCC assessments for all courses in which they are enrolled, including those students who received a waiver for ELA 11 pursuant to N.J.A.C. 6A:8-4.1(c)3i, as of September 6, 2016, and thereafter, but” with “shall take the requisite assessments in ELA 10 and Algebra I in furtherance of meeting the requirements of (a)6i above” because students will be required to take only the State ELA 10 and Algebra I assessments before accessing an alternative pathway to meet the State assessment requirement for graduation. The Department also proposes to clarify that students may use an alternative pathway to meet the State assessment requirement for graduation if they do not achieve a passing score on “one or both of the requisite assessments.” The Department further proposes to amend the rule to state the additional pathways will be available only to those students who have completed coursework in Algebra I and/or ELA grade 10 aligned to the NJSLS in a New Jersey public school.

The proposed amendments to N.J.A.C. 6A:8-5.1(f)2 capture an interim proposal intended to streamline the high school assessment requirements, particularly for students in the class of 2020 and beyond who do not pass State ELA 10 and Algebra I assessments and, therefore, are currently required to take all end-of-course assessments such as Geometry, ELA 9, and ELA 11 before accessing an alternative pathway. Finally, the Department proposes to maintain the current Algebra I and ELA 10 assessment requirements, even for students who take and pass Algebra I prior to entering high school, and to extend the additional pathways rule to classes beyond 2020. The proposed graduation assessment amendments in this section, combined with assessment requirements in N.J.A.C. 6A:8-4.3, ensure that all high school students are required to take only one State assessment in each of the three subjects: mathematics, ELA, and science.

The Department proposes N.J.A.C. 6A:8-5.1(f)3 to provide alternative means of demonstrating proficiency in ELA 10 or Algebra I for students in the graduating classes of 2019 and beyond who completed required coursework at a school that did not offer assessments in ELA 10 or Algebra I, including State ELA 10 and State Algebra I. These alternates include taking and achieving a passing score on the State ELA 10 and Algebra I or achieving a passing score, as determined by the Commissioner, on a corresponding substitute competency test in ELA and/or mathematics, as applicable, or meeting the criteria of the portfolio appeals process.

The Department proposes to delete N.J.A.C. 6A:8-5.1(g), which sets forth the various ways that students beginning with the graduating class of 2021 could demonstrate proficiency in ELA and mathematics rather than passing PARCC. The proposed deletion reflects the extension of the provisions in N.J.A.C. 6A:8-5.1(f)2 to the classes of 2020 and beyond.

The Department proposes to recodify N.J.A.C. 6A:8-5.1(h) and (i) as (g) and (h), respectively.

The Department proposes to amend recodified N.J.A.C. 6A:8-5.1(h), which states that students who participate in the alternative assessment for students with disabilities are not required to participate in repeated administrations of high school end-of-course PARCC assessments, by replacing “high school end-of-course PARCC assessments” with “high school assessment components required in N.J.A.C. 6A:8-4.1(c)” to mirror the language in the cross-referenced rule.

### **N.J.A.C. 6A:8-5.2 High school diplomas**

This section provides the requirements that must be met for district boards of education to award State-endorsed high school diplomas. The section provides the other paths by which New Jersey students can earn a diploma.

The Department proposes to amend the provision in N.J.A.C. 6A:8-5.2(b)2 that allows an out-of-school individual up to age 20 from graduating classes prior to 2016 to demonstrate proficiency as set forth in N.J.A.C. 6A:8-5.1(f)1. The proposed amendment will replace “2016” with “2018” and add “for the classes of 2018 and 2019” after “as set forth” to ensure all members of graduating cohorts prior to the class of 2018 who qualify will have access to all options available to the classes of 2018 and 2019.

As the Department has provided a 60-day comment period on this notice of proposal, the notice is excepted from the rulemaking calendar requirements, pursuant to N.J.A.C. 1:30-3.3(a)5.

### **Social Impact**

The proposed amendments apply to all providers of publicly funded elementary and secondary education programs. The proposed amendments will affect individuals who administer and provide educational services, as well as students who receive the services.

The social impact of the proposed amendments on New Jersey's diverse student population will be positive, because the proposed amendments will simplify the State's high school graduation requirements for assessments while continuing to ensure students are prepared to enter the workforce, job training programs, or higher education. The proposed amendments also will clarify the rules pertaining to students with disabilities and ELLs and, in the case of ELLs, align the requirements to New Jersey's ESSA State Plan.

Streamlining State assessment requirements will ensure high school students take only one State ELA assessment and one State mathematics assessment, while still ensuring students master the knowledge and skills needed to enter the workforce, job training programs, or higher education. Reducing the high school State assessment schedule will have a positive social impact on students, families, educators, and other individuals who administer educational services by diverting more resources to meaningful investments in academic support and career preparation opportunities that help students advance toward post-secondary success.

### **Economic Impact**

The economic impact of the proposed amendments will be positive. The proposed amendments will free up State and school district resources currently spent on administering the multiple assessments that will no longer be administered.

### **Federal Standards Statement**

The proposed amendments are in compliance with, and do not exceed, Federal education requirements included in the Every Student Succeeds Act (ESSA) (P.L. 114-95), which is the 2015 reauthorization of the Elementary and Secondary Education Act (ESEA), and in the Individuals with Disabilities Education Act (IDEA) (20 U.S.C. § 1400). There are no other Federal requirements that impact the proposed amendments.

### **Jobs Impact**

The Department does not anticipate the proposed amendments will result in the generation or loss of jobs.

### **Agriculture Industry Impact**

The proposed amendments will have no impact on the agriculture industry in New Jersey.

### **Regulatory Flexibility Analysis**

The proposed amendments apply to all providers of publicly funded elementary, secondary, and adult high school education programs, including APSSDs. APSSDs are entities approved by the Department according to N.J.A.C. 6A:14-7.2 or 7.3 to provide special education and related services to students with disabilities placed by the district board of education responsible for providing the students' education. Most APSSDs could be considered small businesses as that term is defined by the Regulatory Flexibility Act, N.J.S.A. 52:14B-16 et seq. The chapter's rules are largely programmatic, based on achieving the NJSLS, and must be in place for all students. However, the proposed amendments will not place additional reporting requirements on APSSDs.

### **Housing Affordability Impact Analysis**

The proposed amendments will have an insignificant impact on the affordability of housing in New Jersey. There is an extreme unlikelihood the proposed amendments would evoke a change in the average costs associated with housing because the rules concern academic standards, Statewide assessments, and high school graduation requirements.

### **Smart Growth Development Impact Analysis**

The proposed amendments will have an insignificant impact on smart growth. There is an extreme unlikelihood the proposed amendments would evoke a change in housing production in Planning Areas 1 and 2, or within designated centers, under the State Development and Redevelopment Plan in New Jersey because the proposed amendments concern Statewide assessments and high school graduation requirements.

### **Racial and Ethnic Community Criminal Justice and Public Safety Impact Statement**

There is an extreme unlikelihood that the proposed amendments would have an impact on pretrial detention, sentencing, probation, or parole policies concerning juveniles and adults in the State

because the proposed amendments concern Statewide assessments and high school graduation requirements.

**Full text** of the proposed amendments follows (addition indicated in boldface **thus**; deletions indicated in brackets [thus]):

**N.J.A.C. 6A:8, STANDARDS AND ASSESSMENT**

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## CHAPTER 8, STANDARDS AND ASSESSMENT

### SUBCHAPTER 1. GENERAL PROVISIONS

#### 6A:8-1.3 Definitions

The following words and terms shall have the following meanings when used in this chapter unless the context clearly indicates otherwise.

“Accommodations or modifications to the Statewide assessment system” means changes in testing procedures or formats that provide students with disabilities and English language learners (ELLs) an equitable opportunity to participate in assessment and demonstrate their knowledge and skills in the areas assessed.

“ACTFL” means the American Council on the Teaching of Foreign Languages.

“Adult education assessment test” means a test approved by the United States Department of Education that is used to award a State-issued high school diploma.

“Advanced Placement courses” means courses aligned with course descriptions provided by the College Board and intended to provide students with the opportunity to complete college-level studies during secondary school.

"All students" means every student enrolled in public elementary, secondary, and adult high school education programs within the State of New Jersey, including general education students, students with disabilities, and English language learners (ELLs).

“Alternative **State** assessment for students with disabilities” means the alternative assessment used to determine cumulative student achievement of the knowledge and skills specified by the New Jersey Student Learning Standards for students with disabilities who are unable to participate in the Statewide assessment system.

“Annual measurable objectives” or “AMOs” means the performance targets set by New Jersey in the Elementary and Secondary Education Act (ESEA) flexibility waiver approved by the United States Department of Education.

“Approved private schools for the disabled” means incorporated entities approved by the Department according to N.J.A.C. 6A:14-7.2 or 7.3 to provide special education and related services to students with disabilities who have been placed by the district board of education or charter school responsible for providing their education.

"Assessment" means a State-developed or State-approved standardized instrument or process that measures student performance levels on the New Jersey Student Learning Standards.

“Career awareness, exploration, and preparation” means instruction and programs that assist students to clarify career goals; explore career possibilities; develop employability skills; develop foundational knowledge necessary for success in the workplace; and make the transition from school to careers, including college, training, and employment.

“Career and technical education” means as defined in N.J.A.C. 6A:19-1.2.

“Charter school” means as defined in N.J.A.C. 6A:11-1.2.

“Chief school administrator” means the superintendent of schools or the administrative principal who works directly with the district board of education if there is no superintendent in the school district.

“CLEP” means College-Level Examination Program, which enables students to receive college credit by earning qualifying scores on examinations that are offered by the College Board and cover material taught in courses most students take as requirements in the first two years of college. A college usually grants the same amount of credit to students earning satisfactory scores on the CLEP examination as it grants to students successfully completing the course.

“Content equivalent” means courses or activities that include the same or equivalent knowledge and skills as found in traditionally titled courses that are required for high school graduation and are aligned with the New Jersey Student Learning Standards. The content must be taught by certified teachers, may be integrated in one or more courses, may be titled differently, or may present material in an interdisciplinary or spiral format.

“Credit” means the award for the equivalent of a class period of instruction, which meets for a minimum of 40 minutes, one time per week during the school year or as approved through N.J.A.C. 6A:8-5.1(a)2.

“Cut score” means a score on the assessment scales that demarcates the various performance levels.

“ELL” means English language learner, indicating a person who is in the process of acquiring English and has a first language other than English. ELLs sometimes are referred to as limited English proficient (LEP).

“English language development standards” means as defined in N.J.A.C. 6A:15-1.2.

“Evaluation,” formerly called “monitoring,” means the process by which the Commissioner or his or her designee evaluates the status of each school district or charter school.

"504 plan" means a written educational plan prepared by the 504 team for a 504 student.

“504 student” means a student who has a physical or mental impairment that substantially limits a major life function; has been determined eligible for services, including accommodations and modifications by the school district’s 504 team; and has a 504 plan.

“504 team” means a group of persons that makes program and placement decisions according to Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, and 34 CFR § 104.35(c).

“GED” means tests of General Educational Development taken in order to qualify for a State-issued high school diploma.

“Gifted and talented students” means students who possess or demonstrate high levels of ability in one or more content areas when compared to their chronological peers in the local school district and who require modifications of their educational program if they are to achieve in accordance with their capabilities.

“IEP” means individualized education program as defined in N.J.A.C. 6A:14-1.3.

“IEP team” means as defined in N.J.A.C. 6A:14-1.3.

“Indicator” means statements that further delineate the NJSLS.

“Individualized student learning opportunities” means student experiences based upon specific instructional objectives that meet or exceed the NJSLS at the high school level. Such opportunities may occur in all NJSLS and may include, but are not limited to, independent study; online learning; study-abroad programs; student exchange programs; and structured learning experiences, including, but not limited to, work-based programs, internships, apprenticeships, and service learning experiences. The opportunities shall be based on student interests and career goals.

“Instructional adaptation” means an adjustment or modification to instruction enabling students with disabilities, ELLs, or students in alternative education programs or who are gifted and talented to participate in, benefit from, and/or demonstrate knowledge and application of the NJSLS.

“Interdisciplinary connections” means integrating NJSLS and skills from one or more content areas into instruction and assessment of another content area.

“Laboratory/inquiry-based science course” means a course in which students are systematically provided with ongoing opportunities to use data drawn from or to interact directly with the natural and designed/engineered world, using tools, data collection techniques, models, and scientific concepts and principles.

“Magnet program” means a distinctive program designed to:

1. Attract students by offering a specialized curriculum based on a special theme or method of instruction; and
2. Substantially strengthen the knowledge of academic subjects and the attainment of tangible and marketable vocational, technological, and professional skills of students attending the program.

“MOPI” means the ACTFL Modified Oral Proficiency Interview, which is a standardized assessment of functional speaking ability often used to test lower proficiency ranges.

“Native language” means the language or mode of communication first learned by the student.

“New Jersey Student Learning Standards” or “NJSLS” means standards adopted by the State Board of Education on May 1, 1996, and as thereafter revised by the State Board, and the Common Core State Standards adopted by the State Board on June 16, 2010, and as thereafter revised by the State Board, that describe the knowledge and skills all New Jersey students are expected to acquire by benchmark grades in the following areas: English language arts; mathematics; science; social studies; visual and performing arts; comprehensive health and physical education; world languages; technology; and 21<sup>st</sup> career life and careers. The standards are established for the provision of a thorough and efficient education pursuant to N.J.S.A. 18A:7F-46 and as a basis for the evaluation of school districts in accordance with N.J.A.C. 6A:30.

“OPI” means the ACTFL Oral Proficiency Interview, which is a standardized assessment of functional speaking ability currently available in 37 world languages.

"Pacing guide" means a schedule that includes aligned concepts, topics and skills related to a particular curriculum to be addressed over a defined period of time. It is not a prescriptive, lock-step set of lesson plans that impede an educator's ability to exercise flexibility in meeting students' learning needs.

“PARCC assessment” means the set of assessments designed by the Partnership for Assessment of Readiness for College and Careers **that was used from the 2014-2015 through 2017-2018 school years** to determine student achievement of knowledge and skills specified by the NJSL in English language arts and mathematics.

“Performance level” means one of several categories describing student proficiency with regard to the achievement of the NJSL.

“Personalization” means enabling students to build and strengthen relationships with peers, teachers, other staff members, families, and the community at large through multiple strategies that promote engagement and high expectations based on individual interests and aptitudes, and that are conducive to successful teaching and learning experiences.

“Personalized Student Learning Plan” means a formalized plan and process that involves students setting learning goals based on personal, academic, and career interests, beginning in the middle school grades and continuing throughout high school with the close support of adult mentors, including teachers, counselors, and parents.

“Portfolio appeals process” means an alternative assessment of proficiency for graduation established by the Commissioner, utilizing techniques and instruments other than PARCC

**English language arts (ELA) 10 or Algebra I assessments, or the State ELA 10 and Algebra I assessments, or substitute competency tests.**

“Professional development” means a comprehensive, sustained, and intensive approach to improving the effectiveness of teachers, principals, and other school personnel in raising student achievement.

“Proficient” or “proficiency” means a student-achieved score at or above the cut score<sub>2</sub> which demarks a solid understanding of the content measured by an individual section of any State assessment.

“QSAC” means the Quality Single Accountability Continuum, which is used pursuant to N.J.A.C. 6A:30 to review and evaluate school district operations.

“Rehabilitation Act” means the Federal Rehabilitation Act of 1973, 29 U.S.C. §§ 701 et seq., as amended in 1992.

“Service learning experience” means a method that allows students or participants to learn and develop through active participation in thoughtfully organized activities that are conducted in and meet the needs of a community, and that help foster civic responsibility. Service learning experiences shall be coordinated with the community and with an elementary or secondary school, institution of higher education, or community-services program; shall be integrated into and enhance the school district’s academic curriculum; and shall provide structured time for students to reflect on the service experience.

“STAMP” means Standards-based Measurement of Proficiency, which is a test that is delivered, graded, and reported online, and that assesses students’ language proficiency from the “Novice-Low” to the “Intermediate-Mid” benchmark levels.

“Standards support materials” means documents published by the Department that include and elaborate on the NJSLs for preschool through grade 12 education, and that may assist in the development of local curricula.

“State Board” means the New Jersey State Board of Education.

“State-endorsed diploma” means a locally-issued document awarded to an exiting student indicating successful completion of high school graduation requirements.

“State-issued high school diploma” means a diploma issued by the State of New Jersey.

“State Seal of Biliteracy” means the designation established pursuant to P.L. 2015, c. 303, to recognize high school graduates who have attained a high level of interpretive, interpersonal, and presentational proficiency in one or more languages in addition to English.

“Structured learning experience” means as defined in N.J.A.C. 6A:19-1.2.

“Study abroad programs” means programs that enable New Jersey students to attend a high school in another country for a semester or full academic year to acquire academic and cross-cultural skills that will help them live and work in a globally interdependent world.

“Substitute competency test” means an alternative set of third-party assessments approved by the Commissioner, including, but not limited to the SAT, PSAT, ACT, ACT-Aspire, **Armed Services Vocational Aptitude Battery- Armed Forces Qualifying Test (ASVAB-AFQT)**, or Accuplacer, that can be used to demonstrate competency in the NJSLS for students who have not demonstrated proficiency on **PARCC ELA 10 or Algebra I assessments, or the State ELA 10 or Algebra I assessments.**

"Technological literacy" means students meeting NJSLS 8.1 Educational Technology, obtained through the integration of effective educational technology practices, strategies, and tools throughout all curricular areas.

“Transcript” means a document for all students exiting the public education system that describes a student’s progress toward achievement of the NJSLS and other relevant experiences and achievements.

“Twenty-first century careers” means careers and occupations that have been impacted by technological and global forces and are in an ongoing state of reinvention due to technological advances and e-commerce.

“Twenty-first century themes and skills” means themes such as global awareness; financial, economic, business, and entrepreneurial literacy; civic literacy; health literacy; learning and innovation skills, including creativity and innovation, critical thinking and problem solving, and communication and collaboration; information, media, and technology skills; and life and career skills, including flexibility and adaptability, initiative and self-direction, social and cross-cultural skills, productivity and accountability, and leadership and responsibility.

**SUBCHAPTER 3. IMPLEMENTATION OF THE NEW JERSEY  
STUDENT LEARNING STANDARDS**

**6A:8-3.1 Curriculum and instruction**

- (a) District boards of education shall ensure that curriculum and instruction are designed and delivered in such a way that all students are able to demonstrate the knowledge and skills specified by the NJSLs and shall ensure that appropriate instructional adaptations are designed and delivered for students with disabilities, for ELLs, for students enrolled in alternative education programs, and for students who are gifted and talented.
1. The Department shall provide district boards of education with Standards support materials that suggest a variety of activities and strategies that may assist in the development of local curricula aligned with the NJSLs.
  2. District boards of education shall encourage the active involvement of representatives from the community, business, industry, labor, and higher education in the development of educational programs aligned with the NJSLs.
  3. District boards of education shall be responsible for assessing and publicly reporting on the progress of all students in developing the knowledge and skills specified by the NJSLs, including civics, financial literacy, and all content areas not currently included in the Statewide assessment program.
  4. District boards of education shall [be responsible for developing for] **provide** all students with disabilities **an** educational program[s] aligned with the NJSLs, [with appropriate] **as well as the required individualized** accommodations, instructional adaptations, and/or modifications as [determined by the] **specified in a student's IEP or 504 [team] plan.**

5. District boards of education shall be responsible for identifying gifted and talented students and shall provide them with appropriate instructional adaptations and services.
    - i. District boards of education shall make provisions for an ongoing K-12 identification process for gifted and talented students that includes multiple measures.
    - ii. District boards of education shall provide appropriate kindergarten-through-grade-12 (K-12) educational services for gifted and talented students.
    - iii. District boards of education shall develop appropriate curricular and instructional modifications used for gifted and talented students indicating content, process, products, and learning environment.
    - iv. District boards of education shall take into consideration the Pre-K–Grade 12 Gifted Programming Standards of the National Association for Gifted Children in developing programs for gifted and talented students.
  6. District boards of education shall actively assist and support professional development for teachers, educational services staff, and school leaders, including their efforts to meet mandatory professional development requirements specified in N.J.A.C. 6A:9C-3.
    - i. District boards of education shall facilitate the development and implementation by school leaders of professional growth plans aligned with the requirements set forth at N.J.A.C. 6A:9C.
  7. District boards of education shall be responsible for developing for ELLs English language assistance programs that are aligned to the NJSLS and the English language development standards.
- (b) District boards of education shall be responsible for the delivery of educational programs at the elementary and secondary levels using a coherent sequence of activities to prepare

all students for college and careers upon their graduation. Examples of such programs include, but are not limited to, academic programs, career and technical education programs, and/or magnet programs.

1. District boards of education shall implement educational programs that prepare all students for success in college and careers, including the kindergarten through grade eight development of academic skills integral to success in high school courses.
  2. District boards of education of school districts that include students in at least two of the grades from six through 12 shall develop opportunities for personalization that strengthen relationships among students, teachers, staff members, families, and the larger community for students in grades six through 12.
- (c) District boards of education shall be responsible for the review and continuous improvement of curriculum and instruction based upon changes in knowledge, technology, assessment results, and modifications to the NJSLs, according to N.J.A.C. 6A:8-2.
1. District boards of education shall include interdisciplinary connections throughout the K-12 curriculum.
  2. District boards of education shall integrate into the curriculum 21st century themes and skills.
  3. District boards of education shall provide the time and resources to develop, review, and enhance inter-disciplinary connections, supportive curricula, and instructional tools for helping students acquire required knowledge and skills.  
The tools include, but are not limited to:
    - i. A pacing guide;
    - ii. A list of core instructional materials, including various levels of texts at each grade level;
    - iii. Benchmark assessments; and

- iv. Modifications for special education students, for ELLs in accordance with N.J.A.C. 6A:15, for students at risk of school failure, and for gifted students.
- (d) District boards of education shall establish procedures whereby any student whose parent or guardian presents to the school principal a signed statement that any or part of the instruction in health, family life education, or sex education is in conflict with his or her conscience or sincerely held moral or religious beliefs shall be excused from that part of the course where such instruction is being given and, pursuant to N.J.S.A. 18A:35-4.7, no penalties shall result.

## **SUBCHAPTER 4. IMPLEMENTATION OF THE STATEWIDE ASSESSMENT SYSTEM**

### **6A:8-4.1 Statewide assessment system**

- (a) The Commissioner, in accordance with N.J.S.A. 18A:7C-1 et seq., and 18A:7E-2 and 3, may implement assessment of student achievement in the State's public schools in any grade(s) and by such assessments as he or she deems appropriate. The Commissioner shall report to the State Board the results of such assessments.
- (b) The Commissioner shall implement a system and related schedule of Statewide assessments to evaluate student achievement of the NJSLs.
  - 1. The Commissioner, with the approval of the State Board, shall define the scope and level of student performance on Statewide assessments that demonstrate thorough understanding of the knowledge and skills delineated by the NJSLs at grade levels three through 12.
  - 2. After consultation with the Commissioner, the State Board shall establish by resolution uniform Statewide criteria defining adequate school district progress toward meeting the NJSLs.

- (c) District boards of education shall, according to a schedule prescribed by the Commissioner, administer the applicable Statewide assessments, including the following major components: the elementary assessment component for grades three through five; the middle school assessment component for grades six through eight, the [high school end-of-course PARCC] [[**State English language arts (ELA) 10 and Algebra I assessments**]] **high school assessment component**, and the alternative **State** assessment for students with disabilities and provide notification to each student entering grades three through 12 of the Statewide assessment schedule.
1. The Department shall implement the elementary component of the Statewide assessment of the NJSLs consisting of the following:
    - i. Continued administration of mathematics and English language arts in grades three, four, and five, and of science in grade five.
  2. The Department shall implement the middle school component of the Statewide assessment of the NJSLs consisting of the following:
    - i. Continued administration of mathematics and English language arts in grades six, seven, and eight, and of science in grade eight.
  3. The Department shall implement a high school assessment [[program]] component of the **Statewide assessment of the** NJSLs [[that assesses, at a minimum,]] **consisting of one assessment in each of the following subjects:**
    - i.** English language arts[[,]];
    - ii.** [[mathematics,]] **Mathematics;** and
    - iii.** [[science]] **Science.** [with the exception of the following:
      - i. Students may receive a waiver from the district board of education from taking the high school end-of-course PARCC assessment in ELA 11 due to the student's participation in another English language/literature college placement assessment during the same school year.]

(d) Pursuant to (b) and (c) above, all students at grade levels three through 12, and at any other grade(s) designated by the Commissioner pursuant to (a) above, shall take all appropriate Statewide assessments as scheduled.

1. District boards of education shall provide **all** appropriate accommodations or modifications to the Statewide assessment system as specified by the Department for ELLs and students with disabilities as defined in N.J.A.C. 6A:14-1.3 or eligible under Section 504 of the Rehabilitation Act as [determined by the] **specified in a student's IEP or 504 [team] plan.**

i. District boards of education may administer the Statewide assessments in mathematics to ELLs in their native language, when available, and/or English.

ii. District boards of education shall have the option for a first-year ELL of substituting a Department-approved language proficiency test only for the English language arts [section of the elementary or middle school] component of the Statewide assessment, when the student has entered the United States after [July] **June** 1 of the calendar year prior to the test administration.

**(1) First-year ELLs who substitute a Department-approved English language proficiency test for the State ELA 10 assessment in accordance with [[N.J.A.C. 6A:8-4.1(d)1ii]] (d)1ii above are not required to take the State ELA 10 assessment.**

2. District boards of education shall ensure students with disabilities as defined in N.J.A.C. 6A:14-1.3 participate in Statewide assessments in accordance with N.J.A.C. 6A:14-4.10.

3. At specific times prescribed by the Commissioner, district boards of education shall administer the alternative **State** assessment for students with disabilities to students with severe disabilities who cannot participate in other assessments due to the severity of their disabilities.
    - i. The Department shall implement the alternative **State** assessment for students with disabilities according to the schedules in (c)1, 2, and 3 above.
    - ii. The alternative **State** assessment for students with disabilities measures the progress of students who have been determined eligible for the alternative **State** assessment for students with disabilities by the IEP team in accordance with N.J.A.C. 6A:14-4.10.
    - iii. **The Department also shall implement an approved English language proficiency assessment to measure the progress in English language proficiency of ELLs who have been determined eligible by the IEP team for an alternative Department-approved English language proficiency assessment for students with disabilities.**
  4. District boards of education shall implement alternative ways for students to demonstrate graduation proficiency in accordance with N.J.A.C. 6A:8-5.1(f).
- (e) District boards of education shall be responsible for ensuring the security of all components of the Statewide assessment system that are administered within the school district.

#### **6A:8-4.3 Accountability**

- (a) Chief school administrators shall report [preliminary and] final results of annual assessments to district boards of education **and members of the public at a public meeting** within [60] ~~[[45]]~~ **60** days of receipt of information from the Department.
- (b) [District boards of education] **Chief school administrators** shall provide **educators, parents, and students**[, and citizens] with the results of annual assessments [according to] ~~[[in accordance with]]~~ **as required in** N.J.A.C. 6A:8-4.2(a), ~~[[as applicable,]]~~ **within** ~~[[45]]~~ **30** days of receipt of information from the Department.
- (c) District boards of education shall provide appropriate instruction to improve skills and knowledge for students performing below the established levels of student proficiency in any content area either on the Statewide or local assessments.
- (d) All students shall be expected to demonstrate the knowledge and skills of the NJSLs as measured by the Statewide assessment system.

#### **6A:8-4.5 Public reporting**

- (a) The Department shall report annually to the State Board and the public on the progress of all students and student subgroups in meeting the NJSLs as measured by the Statewide assessment system by publishing and distributing the Department's annual New Jersey School Report Card in accordance with N.J.S.A. 18A:7E-2 through 5.
- (b) After each test administration, the Department shall report to district boards of education on the performance of all students and of student subgroups.
- (c) The Department shall report performance on the [APA] **alternative State assessment for students with disabilities** with the same frequency and in the same detail as it reports on other Statewide assessments, including school and school district means, and the number and percentage of participating students.

- (d) In public reporting of school and district performance data, the Department shall not compromise the confidentiality of individual students.

## **SUBCHAPTER 5. IMPLEMENTATION OF GRADUATION REQUIREMENTS**

### **6A:8-5.1 Graduation requirements**

- (a) For a State-endorsed diploma, district boards of education shall develop, adopt, and implement local graduation requirements that prepare students for success in post-secondary degree programs, careers, and civic life in the 21st century, and that include the following:
1. Participation in a local program of study of not fewer than 120 credits in courses designed to meet all of the NJSLs, including, but not limited to, the following credits:
    - i. At least 20 credits in English language arts, aligned to grade nine through 12 standards, effective with the 2009-2010 grade nine class;
    - ii. At least 15 credits in mathematics, including algebra I or the content equivalent effective with the 2008-2009 grade nine class; geometry or the content equivalent effective with the 2010-2011 grade nine class; and a third year of mathematics that builds on the concepts and skills of algebra and geometry and that prepares students for college and 21st century careers effective with the 2012-2013 grade nine class;
    - iii. At least 15 credits in science, including at least five credits in laboratory biology/life science or the content equivalent effective with the 2008-2009 grade nine class; one additional laboratory/inquiry-based science course, which shall include chemistry, environmental science, or physics effective

- with 2010-2011 grade nine class; and one additional laboratory/inquiry-based science course effective with 2012-2013 grade nine class;
- iv. At least 15 credits in social studies, including satisfaction of N.J.S.A. 18A:35-1 and 2; five credits in world history; and the integration of civics, economics, geography and global content in all course offerings;
  - v. At least 2.5 credits in financial, economic, business, and entrepreneurial literacy, effective with 2010-2011 grade nine class;
  - vi. At least 3 <sup>3</sup>/<sub>4</sub> credits in health, safety, and physical education during each year of enrollment, distributed as 150 minutes per week, as required by N.J.S.A. 18A:35-5, 7 and 8;
  - vii. At least five credits in visual and performing arts;
  - viii. At least five credits in world languages or student demonstration of proficiency as set forth in (a)2ii(2) below;
  - ix. Technological literacy, consistent with the NJSLS, integrated throughout the curriculum; and
  - x. At least five credits in 21st century life and careers, or career-technical education;
2. The 120-credit requirement set forth in (a)1 above may be met in whole or in part through program completion of a range of experiences that enable students to pursue a variety of individualized learning opportunities, as follows:
- i. District boards of education shall establish a process to approve individualized student learning opportunities that meet or exceed the NJSLS.
    - (1) Individualized student learning opportunities in all NJSLS areas include, but are not limited to, the following:
      - (A) Independent study;
      - (B) Online learning;

- (C) Study abroad programs;
  - (D) Student exchange programs; and
  - (E) Structured learning experiences, including, but not limited to, work-based programs, internships, apprenticeships, and service learning experiences.
- (2) Individualized student learning opportunities based upon specific instructional objectives aimed at meeting or exceeding the NJSLS shall:
- (A) Be based on student interest and career goals as reflected in the Personalized Student Learning Plans
  - (B) Include demonstration of student competency;
  - (C) Be certified for completion based on the district process adopted according to (a)2ii below; and
  - (D) Be on file in the school district and subject to review by the Commissioner or his or her designee.
- (3) Group programs based upon specific instructional objectives aimed at meeting or exceeding the NJSLS shall be permitted under this section and shall be approved in the same manner as other approved courses.
- ii. District boards of education shall establish a process for granting of credits through successful completion of assessments that verify student achievement in meeting or exceeding the NJSLS at the high school level, including standards achieved by means of the individualized student learning opportunities enumerated at (a)2 above. Such programs or assessments may occur all or in part prior to a student's high school enrollment; no such locally administered assessments shall preclude or

exempt student participation in applicable Statewide assessments at grades three through 12.

(1) District boards of education shall choose assessments that are aligned with or exceed the NJSLS and may include locally designed assessments.

(2) District boards of education shall choose from among the following assessment options to determine if students have achieved the level of language proficiency designated as Novice-High as defined by the ACTFL and recognized as fulfilling the world languages requirement of the NJSLS:

(A) The STAMP online assessment;

(B) The OPI or MOPI; or

(C) Department-approved locally designed competency-based assessments;

iii. District boards of education shall establish a process to approve post-secondary learning opportunities that may consist of Advanced Placement (AP) courses, CLEP, or concurrent/dual enrollment at accredited higher education institutions.

(1) District boards of education shall award credit for successful completion of an approved, accredited college course that assures achievement of knowledge and skills that meets or exceeds the NJSLS.

3. Local student attendance requirements;

4. Any other requirements established by the district board of education;

5. Any statutorily mandated requirements for earning a high school diploma;

6. The requirement that all students demonstrate proficiency [in the high school end-of-course PARCC] **by:**

- i. **Achieving a passing score on** assessments in ELA 10 and Algebra I,   
    - [[including]] **such as** State ELA 10 and State Algebra I; or [through]
  - ii. **Through** the alternative means set forth at (f) through [(i)] **(h)** below;
- 7. Students graduating from an adult high school shall demonstrate proficiency in   
[the high school end-of-course PARCC] assessments in ELA 10 and Algebra I,   
[[including the]] **such as** State ELA and State Algebra I, or through the   
alternative means set forth at (f) through [(i)] **(h)** below.
- (b) In the development of Personalized Student Learning Plans according to N.J.A.C. 6A:8-3.2(a), district boards of education shall actively encourage all students who have otherwise met the requirements for high school graduation according to (a)1 through 3 above, to include in their programs of study the following additional credits:
  - 1. Five credits in mathematics during each year of enrollment, aimed at preparation for entrance into post-secondary programs or 21st century careers;
  - 2. Five credits in a laboratory science during each year of enrollment, aimed at preparation for entrance into post-secondary programs or 21st century careers;
  - 3. Five credits in social studies during each year of enrollment, aimed at preparation for entrance into post-secondary programs or 21st century careers; and
  - 4. Five credits in world languages during each year of enrollment, aimed at preparation for entrance into post-secondary programs or 21st century careers.
- (c) Through the IEP process and pursuant to N.J.A.C. 6A:14-4.11, district boards of education may specify alternate requirements for a State-endorsed diploma for individual students with disabilities as defined in N.J.A.C. 6A:14-1.3.
  - 1. District boards of education shall specifically address any alternate requirements for graduation in a student’s IEP, in accordance with N.J.A.C. 6A:14-4.11.

2. District boards of education shall develop and implement procedures for assessing whether a student has met the specified alternate requirements for graduation individually determined in an IEP.
- (d) District boards of education shall provide to the executive county superintendent their graduation requirements each year they are evaluated through QSAC and update the filed copy each time their graduation policies are revised.
  - (e) District boards of education shall provide each student entering high school and his or her parents or legal guardians with a copy of the district board of education's requirements for a State-endorsed diploma and the programs available to assist students in attaining a State-endorsed diploma, in accordance with N.J.S.A. 18A:7C-5.
  - (f) [To ensure adequate transition to the new Statewide assessment system, district] **District** boards of education shall provide students who have not demonstrated proficiency on the [high school end-of-course PARCC assessments in] ELA 10 and Algebra I **assessments with the opportunity to retake the applicable assessment if the student so chooses and** with the opportunity to demonstrate such competence through one of the alternative means set forth below:
    1. For the graduating classes of [2016, 2017,] 2018[,] and 2019 students who did not take both the ELA 10 and the Algebra I end-of-course PARCC assessment or who [take,] **took** but [do] **did** not achieve a passing score on **one or** both assessments, as required by (a)6i above, may satisfy the State requirement to demonstrate proficiency in English language arts and/or mathematics, **as applicable**, in one of the following ways:
      - i. Achieve a passing score, as determined by the Commissioner, on a corresponding substitute competency test in English language arts and/or mathematics, as applicable[, or substitute a passing score on another end-

of-course PARCC assessment, including ELA 9, ELA 11, Geometry, or Algebra II]; or

ii. Meet the criteria of the portfolio appeals process; and

2. For the graduating [class] **classes of 2020 and beyond, all students who have completed coursework in Algebra I and/or ELA grade 10 [[that culminates]] aligned to the NJSLs in a New Jersey public school [[awarding credit for mastery of the corresponding NJSLs]] shall take [all applicable high school end-of-course PARCC assessments for all courses in which they are enrolled, including those students who received a waiver for ELA 11 pursuant to N.J.A.C. 6A:8-4.1(c)3i, as of September 6, 2016, and thereafter, but] the requisite assessments in ELA 10 and Algebra I in furtherance of meeting the requirements of (a)6i above. Students who do not achieve a passing score on one or both of the [ELA 10 and Algebra I end-of-course PARCC] requisite assessments pursuant to (a)6i above, may satisfy the State requirement to demonstrate proficiency in English language arts and/or mathematics in one of the following ways:**

i. Achieve a passing score, as determined by the Commissioner, on a corresponding substitute competency test in English language arts and/or mathematics, as applicable[, or substitute a passing score on another end-of-course PARCC assessment, including ELA 9, ELA 11, Geometry, or Algebra II]; or

ii. Meet the criteria of the portfolio appeals process.

3. **For the graduating classes of 2019 and beyond, students who completed the required coursework at a school that did not offer assessments allowing the student the opportunity to satisfy (a)6i above shall satisfy the State**

**requirement to demonstrate proficiency in ELA and/or mathematics in one of the following ways:**

- i. Take and achieve a passing score on the State ELA 10 and Algebra I;**
- or**
- ii. Achieve a passing score, as determined by the Commissioner, on a corresponding substitute competency test, as determined by the Commissioner, in ELA and/or mathematics, as applicable; or**
- iii. Meet the criteria of the portfolio appeals process.**

**[[4. First-year ELLs who substitute a Department-approved English language proficiency test for the State ELA 10 assessment in accordance with N.J.A.C. 6A:8-4.1(d)1ii are not required to take the State ELA 10 assessment.]]**

[(g) Beginning with the graduating class of 2021, students who take all applicable high school end-of-course PARCC assessments for all courses in which they are enrolled, including those students who received a waiver for ELA 11 pursuant to N.J.A.C. 6A:8-4.1(c)3i, as of September 6, 2016, and thereafter, but do not achieve a passing score on both the ELA 10 and Algebra I end-of-course PARCC assessments pursuant to (a)6 above, by the conclusion of their senior year and after multiple opportunities to take the assessments, may satisfy the State requirement to demonstrate proficiency in English language arts and mathematics by meeting the criteria of the portfolio appeals process.]

[(h)] (g) All ELLs shall satisfy the requirements for high school graduation, except ELLs may demonstrate they have attained State minimum levels of proficiency through passage of the portfolio appeals process in their native language, when available, and passage of a Department-approved English fluency assessment.

[(i)] (h) Students with disabilities as defined in N.J.A.C. 6A:14-1.3 or eligible under Section 504 of the Rehabilitation Act who participate in the alternative assessment for students with disabilities are not required to participate in repeated administrations of

[high school end-of-course PARCC] [[the State ELA 10 or Algebra I assessments]]

**high school assessment components required in N.J.A.C. 6A:8-4.1(c).**

### **6A:8-5.2 High school diplomas**

- (a) District boards of education shall award a State-endorsed high school diploma to prospective graduates who have met all of the requirements adopted in accordance with N.J.A.C. 6A:8-5.1(a) or (c), or (d) below.
- (b) District boards of education shall not issue a high school diploma to any student not meeting the criteria specified in the rule provisions referenced in (a) above.
  - 1. District boards of education shall provide students exiting grade 12 without a diploma the opportunity for continued high school enrollment to age 20 or until the requirements for a State-endorsed diploma have been met, whichever comes first.
  - 2. District boards of education shall allow any out-of-school individual to age 20 who has otherwise met all State and local graduation requirements but has failed to pass [high school end-of-course PARCC] **State assessments in ELA 10 or Algebra I** to demonstrate proficiency as set forth in N.J.A.C. 6A:8-5.1(f) pursuant to the standards applicable to the student's graduating class. Students in graduating classes prior to [2016] **2018** shall demonstrate proficiency as set forth **for the classes of 2018 and 2019** in N.J.A.C. 6A:8-5.1(f)1. Upon certification of passing the test applicable to the student's class in accordance with this chapter, a State-endorsed diploma shall be granted by the high school of record.
- (c) Pursuant to N.J.A.C. 6A:20-1.4, the Commissioner shall award a State-issued high school diploma based on achieving the Statewide standard score on the General Education Development test (GED) or other adult education assessments to individuals age 16 or older who are no longer enrolled in school and have not achieved a high school credential.

- (d) The Commissioner shall award a State-issued high school diploma to individuals age 16 or older and no longer enrolled in high school based on official transcripts showing at least 30 general education credits leading to a degree at an accredited institution of higher education. Included in the 30 general education credits must be a minimum of 15 credits with at least three credits in each of the five general education categories as follows: English; mathematics; science; social science; and the humanities.
- (e) District boards of education shall award a State-endorsed high school diploma to any currently enrolled student, regardless of grade level, who:
1. Has demonstrated proficiency in [the high school end-of-course PARCC assessments in] ELA 10 and Algebra I[, or] as set forth in N.J.A.C. 6A:8-5.1(f);
  2. Has presented official transcripts showing at least 30 general education credits leading to a degree at an accredited institution of higher education; and
  3. Has formally requested such early award of a State-endorsed high school diploma.
- (f) Pursuant to N.J.S.A. 18A:7C-7 and 18A:7E-3, the chief school administrator or lead person of a charter school shall report annually to the district board of education or the charter school board of trustees at a public meeting not later than September 30, and to the Commissioner:
1. The total number of students graduated;
  2. The number of students graduated under the substitute competency test process;
  3. The number of students graduated under the portfolio appeals process;
  4. The number of students receiving State-endorsed high school diplomas as a result of meeting any alternate requirements for graduation as specified in their IEPs;
  5. The total number of students denied graduation from the 12th grade class; and
  6. The number of students denied graduation from the 12th grade class solely because of failure to pass the [high school end-of-course PARCC] **State ELA 10**

**or State Algebra I** assessments, substitute competency tests, or portfolio appeals process based on the provisions of this chapter.