

PROPOSAL FOR BOARD OF DIRECTORS FCAT WAIVER EXTENSION POLICY

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EXECUTIVE SUMMARY

In this document I propose that the Florida Department of Education (FDOE) extend its Florida Comprehensive Assessment Test (FCAT) waiver policy; the extension would allow students to substitute college admissions standardized tests in place of FCAT scores to satisfy their graduation requirements. Presently, FDOE allows for the use of passing SAT or ACT scores as a substitution for FCAT scores only after a student has attempted the FCAT a total of three times without earning a passing score. The proposed policy would remove the “three strikes, then substitute policy” and allow a student to forego taking the Grade 10 FCAT by electing to substitute FCAT scores with College Board standardized test scores.

The advantages of this proposal include:

1. A potential **reduction of more than \$1.5 million** per year in the cost to administer the FCAT.
2. An **increase in college readiness** with more students taking tests required for college admissions.
3. **Higher graduation rates** as students are afforded FCAT alternatives for graduation earlier in their high school careers.
4. Building on recent **gains in secondary education rankings** by state, thereby attracting better educators.

This document consists of:

1. Proposed Policy
2. Background
3. Analysis
4. Conclusion
5. Appendix

PROPOSAL

This proposal, essentially, would amend Section 1008.22, Florida Statutes, by striking all of §1008.22(10)(b). Section (10)(b) reads:

In order to use a concordant subject area score pursuant to this subsection to satisfy the assessment requirement for a standard high school diploma . . . a student must take each subject area of the grade 10 FCAT a total of three times without earning a passing score.¹

Without section (10)(b), section (10)(a) would stand unrestricted. Section (10)(a), once unrestrained, accomplishes the goals of this policy proposal. The pertinent language reads:

In cases where content alignment and concordant scores can be determined, the Commissioner of Education shall adopt those scores as meeting the graduation requirement in lieu of achieving the FCAT passing score and may adopt those scores as being sufficient to achieve additional purposes as determined by rule.²

BACKGROUND

Every year thousands of high school students throughout the State of Florida take multiple standardized tests which all test on a common cannon of core subjects.³ In fact, it is not uncommon for a high school student to take the PSAT, SAT, ACT, FCAT, and a handful of AP tests in his four years of high school. The FCAT is paid for entirely by the Department of Education, whereas, the SAT and ACT are generally paid for by the student.⁴ This raises the question of whether tax payer dollars are best spent administering a test to students who have already demonstrated their college-readiness by scoring well on a comparable standardized test.

Moreover, the amount of tax payer dollars at issue is no tiny sum. From 1998 to 2008 the price of the FCAT has quadrupled.⁵ The cost of developing, administering, and scoring the FCAT weighed in at a staggering \$51.5 million in 2008.⁶ This heavy price tag, and the yearly increases in overall costs, has left many guessing if the current system is sustainable.⁷ Factor in

an estimated \$2.7 billion deficit in the state budget for the 2010 – 2011 year, and the tenability of this trend seems even more unlikely.⁸

However, there are ways to curb this trend and reduce the price tag of the FCAT. This proposal suggests one way to remove a large piece of the overall cost, while also promoting other policy improvements in Florida’s secondary education system. Coupled with other reductions in cost, the Department of Education can get control on the rising price while not compromising the value of the FCAT to Florida’s students.

ANALYSIS

In lean times—such as those we are currently experiencing in the State of Florida—it is pertinent that changes in the policies and laws of the state should come at no additional cost to the tax payers if at all possible. In fact, the shrewdest policy would be one which reduces costs, thereby freeing up money for addressing other deficit related issues. This policy attempts to accomplish just that, and the following sections will explain how to achieve the policy goals by discussing: 1) the implementation process, 2) the benefits that policy will bring, and 3) the hurdles that stand in the way of the policy’s success.

1. Process

Once §1008.22(10)(b) is removed from the Florida Statutes, §1008.22(10)(a) will allow the Commissioner of Education to adopt “those scores as meeting the graduation requirement in lieu of achieving the FCAT passing score,” and to do so in the manner prescribed by administrative rule.⁹ For the 2010-11 school year, the FDOE has decided on concordant SAT scores of 420-Reading and 340-Math for a total SAT score of 760.¹⁰ In other words, in the current system, if a student were to take the FCAT three times without receiving a passing score, the student could substitute an SAT score of 760 or greater and be eligible to graduate.¹¹ This

policy would not suggest a change the Commissioners determination of the concordant scores. Under the current arrangement, the schools already receive the SAT information for each student directly from the College Board, so reporting and verification are not an issue.

The Department of Education would likely want to promulgate additional administrative rules to handle the new waiver process. Whatever processes the Department chooses would likely lead to a realization of the majority of the desired benefits. However, this policy would recommend allowing students to complete a form, on paper or on-line, which would indicate their plans to take the SAT, ACT, or PSAT before the last testing date in their 10th grade year.¹² The form could require proof of registration for one of these testing dates, which the testing companies already provide to the students. Over the summer the scores would arrive to the high schools, just as they do already. If the student did not actually take the test, or if the student's scores were not sufficient concordant scores, the student would then take the Grade 10 FCAT in October during the already scheduled testing times.¹³ This policy would still allow the student to take the Grade 10 FCAT as many as four times before her scheduled graduation, as opposed to the current system which allows for five times.¹⁴

2. Benefits

College Preparedness. Every year thousands of students in the State of Florida do not take a standardized college admissions test¹⁵, despite the fact that the overwhelming majority of colleges in the nation require such tests for admissions.¹⁶ In a recent ranking conducted by Quality Counts, Florida ranked 8th among all states for the quality of our public education.¹⁷ However, the state's second lowest score on that assessment was the grade of "C" on "how likely students are to go to college or enter the workforce after graduation."¹⁸

In 2009 only 57.9% of graduating seniors had taken the SAT.¹⁹ Not surprisingly, more rural and lower funded districts report the lowest number of test takers—some districts report fewer than 5% test takers in their graduating classes.²⁰ This policy would instruct teachers, counselors, and school administration to encourage all students to register and take the SAT or ACT the summer of their sophomore year. In contrast to the current scenario, this proposal would aim to have over 90% of students taking a college entrance exam before graduating high school.

Starting college admission testing early would allow students to take both admissions tests multiple of times, if desired, and still have time to apply to college or vocational schools early in their senior year. Furthermore, as the high schools become more effective in promoting college preparedness, the schools can take a more active role in effectuating fee waivers for students needing financial assistance. All of these changes will make students more prepared for admission into higher education, by removing a hurdle that keeps many from ever initiating the process.

Lowered Cost. If 80% of 10th grade students were to elect to substitute their first administration of the Grade 10 FCAT for their SAT or ACT scores, and those roughly 145,000 students scored in the same distribution as Florida students already taking the SAT and ACT, then more than 115,000 students would forego having to take the Grade 10 FCAT. This would result in an instant reduction of almost \$1.5 million in the cost of *administering* the FCAT (i.e. the printing, administration, and scoring costs).²¹ This money could be used to fund other projects in education in a year where deficits are expected to be in excess of \$2 billion.

Higher Graduation Rates. Furthermore, this policy has the potential to improve graduation rates amongst high school seniors in Florida's public schools. This policy allows a

student to try one test, the SAT or ACT, and if he does not receive qualifying concordant scores, can then immediately attempt to pass the FCAT. Should the student fail the FCAT, he can then attempt one of the over twelve offerings of the SAT and ACT throughout the year, until the next administration of the FCAT. This system gives the student literally dozens of times a year to pass either the FCAT, SAT, or SAT before he graduates.

The current system, however, requires the student to fail the FCAT three times before she can substitute her scores. She must wait until the conclusion of her junior year in high school before she can prepare to take a different test which will provide her a substitute score. Thus, the recommended policy offers a student more options, earlier, which should lead to a greater opportunity for achieving a passing score.

Moreover, it is possible that by increasing the number of high school students taking college admissions exams, the students might be more likely to seek graduation from high school to take advantage of the scores they have received. For example, receiving an above average score on the ACT in a student's sophomore year might encourage that student to apply herself more throughout high school in hopes of gaining admission to a quality college or university. This student would be more likely to complete other graduation requirements—such as passing classes, taking requisite courses, etc.—that she might have lacked the initiative to do otherwise.

Building on Rankings Gains. As Florida continues to attract the best educators from around the nation and world, it is important to monitor Florida's relative strengths compared to other states. Recently Florida public schools ranked 8th in nation.²² One facet of this ranking is "how likely students are to go to college or enter the workforce after graduation."²³ Having more students taking college entrance exams would likely result in an improvement in this category. Other ranking services rank state education systems based on graduation rates, and

average test scores; this proposal would work to improve both of these variables. As Florida improves in the rankings, the state may be able to attract better teachers, and possibly even more funding from the federal government. This policy could really differentiate Florida secondary education, and demonstrate how innovative the state education system can be under budget restraints. Such a demonstration could really cultivate talent within the state, and attract new talent from beyond our borders.

3. Hurdles

As with any change in education, the largest hurdle will be the resistance to change itself. Though this issue is far from a crisis, if ways to reduce the price of the FCAT are not found, this issue could soon become one of critical importance. Furthermore, the policy provides many more benefits, described above, for which no dollar amount can be assigned.

Nonetheless, making any changes to the education statutes involves a lot of players and interested parties. Bringing all of the groups to the table, and creating some kind of concordance, can often be difficult.²⁴ Furthermore, educators and state officials who have been administering the FCAT over the past 12 years are accustomed to the process as it is now, and might view this as an unnecessary complication, or might be weary of waiting to administer the FCAT until the start of a student's junior year.

However, in actuality, this proposal would only delay the first administration of the Grade 10 FCAT for a student by 7 months; and the policy actually provides the student *more* opportunities to achieve a passing score because the student can take multiple SAT and ACT tests while also attempting to retake the FCAT. Also, although this policy would add an additional avenue for test takers, the complication is minimal. The testing companies already supply the schools with the scores, and since the FDOE already allows for the substitution of

SAT or ACT scores, this proposal really only asks for an extension of the already approved policy. Furthermore, any minimal complications, if any, which are introduced by this policy are largely outweighed by the four benefits listed above.

CONCLUSION

Therefore, the state legislature and the FDOE should adopt this policy proposal for its potential to reduce the cost of administering the FCAT by up to \$1.5 million per year; and its potential to improve college readiness, graduation rates, and Florida's secondary education rankings. Secondary education in Florida has shown dramatic increases in the past decade, and the state should not take such improvements as an invitation to rest on its laurels. Instead the state should take this opportunity to demonstrate its ingenuity and leadership in an economically troubled time, by making positive policy changes that have the added advantage of saving tax payer dollars.

APPENDIX

¹ Fla. Stat. § 1008.22(10)(b) (2009).

² Fla. Stat. § 1008.22(10)(a) (2009).

³ See FDOE, *Graduation Requirements*, ¶ 4 (2009), <http://fcats.fldoe.org/pdf/fcatpass.pdf>. Allowing for the substitution of concordant scores, assumingly due to the comparative nature of the subject matter of the tests.

⁴ If the student is unable to finance his or her own test scores, the student may be eligible for a fee waiver to take the test at no cost.

⁵ See FDOE, *The Financial Cost of the FCAT*, ¶ 2 (2009), <http://fcats.fldoe.org/pdf/FinCostofFCAT.pdf>.

⁶ See FDOE, *The Financial Cost of the FCAT*, ¶ 2 (2009), <http://fcats.fldoe.org/pdf/FinCostofFCAT.pdf>.

⁷ See eg. Matus, Ron, *10 Years of FCAT Angst*, ST. PETERSBURG TIMES, March 10, 2008.

⁸ See Lorabee, Brandon, *Florida's \$3B budget shortfall means tough choices*, THE FLORIDA TIMES-UNION, February 27, 2010.

⁹ Fla. Stat. § 1008.22(10)(a) (2009).

¹⁰ The concordant ACT score is 18-Reading, 15-Math. See FDOE, *Graduation Requirements*, ¶ 4 (2009), <http://fcats.fldoe.org/pdf/fcatpass.pdf>.

¹¹ The score of 760 assumes that the student received the required 420-Reading and 340-Math breakdown. For example, a score of 800 would not allow for substitution if the reading score was a 410.

¹² The last testing date is usually in early June. See College Board, *SAT Test dates* (2010), <http://sat.collegeboard.com/register/sat-dates>.

¹³ See FDOE, *FCAT Schedule* (2009), <http://info.fldoe.org/docushare/dsweb/Get/Document-5063/fcatscheduleb.pdf>.

¹⁴ See FDOE, *FCAT Schedule* (2009), <http://info.fldoe.org/docushare/dsweb/Get/Document-5063/fcatscheduleb.pdf>.

¹⁵ See FDOE, *ACT/SAT/AP Data* (2009), <http://www.fldoe.org/evaluation/act-sat-ap.asp>.

¹⁶ See National Center for Fair and Open Testing, *Test Score Optional List* (2010), <http://www.fairtest.org/university/optional>.

¹⁷ *Florida Public Schools Ranked 8th Nationally*, THE ST. AUGUSTINE RECORD, January 15, 2010.

¹⁸ *Florida Public Schools Ranked 8th Nationally*, THE ST. AUGUSTINE RECORD, January 15, 2010.

¹⁹ See FDOE, *SAT Trends Florida and the Nation, 2* (2009), <http://www.fldoe.org/evaluation/pdf/SAT2009.pdf>. A similar percentage of students have also taken the ACT, roughly 61%. Data could not be found which would suggest what kind of overlap there is amongst the two tests.

²⁰ See FDOE, *2009 SAT Scores – Florida Public Schools by District* (2009), <http://www.fldoe.org/evaluation/xls/SATFLSchools2009.xls>.

²¹ See FDOE, *SAT Trends Florida and the Nation, 2* (2009), <http://www.fldoe.org/evaluation/pdf/SAT2009.pdf>; see also College Board, *SAT Percentile Ranks Composite*, (2009), http://professionals.collegeboard.com/profdownload/sat_percentile_ranks_composite_cr_m_w.pdf. The concordant scores as chosen by the Commissioner of Education are roughly in the 15 percentile for the State of Florida, which means that roughly 85% of students taking the SAT score above the concordant scores. The formula used in this proposal assumes a more conservative number of 80% of SAT test takers achieving the concordant score. This also assumes a cost of administering the FCAT for each student in 2011 to be roughly \$12.55, a conservative number considering it cost \$11.55 per student in 2008.

²² *Florida Public Schools Ranked 8th Nationally*, THE ST. AUGUSTINE RECORD, January 15, 2010.

²³ *Florida Public Schools Ranked 8th Nationally*, THE ST. AUGUSTINE RECORD, January 15, 2010.

²⁴ See e.g., Kaczor, Bill, *Crist Inks Increased Fla. Graduation Requirements*, MIAMI HERALD, April 20, 2010.