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Attention: Molly Spearman, State Superintendent of Education  
Leslie Dawes, Assessment Program Coordinator  
Basil Harris, Federal and State Accountability Associate

Dear SCDE Administrators,

On behalf of Carolina TESOL, the professional organization representing 133 English language educators and their students in South Carolina, I am writing to express our concern over some of the test administrative procedures on ACCESS 2.0 for ELLs, our state's annual assessment for English learners.

First, the mandate to assess any potential English learner who enrolls prior to the state's testing deadline, even the very last day of testing, is unreasonable and adds undue stress to the student. We request that the state set a cut-off date of 10 days prior to the deadline similar to the guidance established in our neighboring states for the same assessment. New students must first be screened to determine their English proficiency level using the WIDA Online Screener, which takes approximately 1 hour 10 minutes to complete. This time does not account for the additional time required for test setup, convening the students, explaining the directions, and scoring the assessment (*WIDA Screener: English Language Proficiency Test, Test Administration Manual Online Screener*, revised 2019). If the student does qualify for ESOL services, he/she is then required to complete all 4 domains of ACCESS, possibly in the same day. According to

WIDA Access 2.0 Manual for 2018-19, the times needed to complete ACCESS are Reading and Listening 45 minutes each, Writing 65 minutes, and Speaking 35 minutes. This can result in students potentially testing for six hours during their first days in a new school, state, and possibly a new country. SCDE ESOL Handbook indicates that districts are allowed 10 days for screening and notifying parents. By mandating for all students who enroll by the last day of testing to be screened and assessed, the Office of Assessment is adding unreasonable expectations for teachers, staff, and students. By setting a cut-off date of 10 days prior to the testing deadline, students will have sufficient time for the WIDA Online Screener and schools will have sufficient time to notify parents of their child's eligibility and of the upcoming assessment..

Another concern is that English learners who transfer from other WIDA states are now required to complete ACCESS in SC, even if the student already completed the assessment in another state that same school year. We request that ACCESS scores from other states are accepted within the same school year, even if the score is not yet available, as long as the school of origin agrees to communicate the scores to the SC school. Making students complete the same test, possibly within days of each other, changes the validity and reliability of the scores while also replacing valuable instructional time with an assessment that the student has already completed.

In addition, the state's decision to administer ACCESS exclusively online prevents homebound students from taking the assessment. We propose a medical waiver that allows for paper-based administration for students who are homebound at any point during the testing window. This will reduce the number of students not assessed due to medical conditions that prevent them from attending school, providing a more accurate measure of students' proficiency growth.

We greatly appreciate your efforts to improve instruction and assessment for English Learners in our state. Thank you in advance for your attention to these matters.

Sincerely,

*Laurie Smith*

Laurie Smith, President