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*Richard Woods, Georgia's School Superintendent*

*"Educating Georgia's Future"*

December 12, 2017

The Honorable Betsy DeVos  
Secretary of Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

Dear Honorable Betsy DeVos:

The Georgia Department of Education is requesting a waiver to expand the assessment exception for advanced mathematics in middle school under the *Every Student Succeeds Act* (ESSA 1111(b)(2)(B)(i)(I), 34 CFR §200.5(b)). Georgia is seeking to broaden this exception beyond its limited focus on eighth grade mathematics students to include students in sixth, seventh, and eighth grades assessed in high school courses in mathematics, English language arts, and science for which the State administers an end-of-course assessment.

Since adopting statewide college- and career-ready standards, Georgia has experienced growing demand for advanced academic options for middle school students. The State's ESEA flexibility waiver addressed this previously by ensuring that middle school students enrolled in high school mathematics and science courses were only administered the end-of-course assessment and not the end-of-grade assessments for that content area. This elimination of double-testing supported State and LEA efforts to promote advanced academic options for all students.

The State believes strongly that, rather than limiting the benefits of this exception to eighth-grade students enrolled in high school mathematics courses, this exception should be available to all middle school students seeking exposure to advanced academic courses in mathematics, English language arts, and science. In the attached waiver request, you will find the State's proposal for expanding the scope of section 1111(b)(2)(C) and how doing so will benefit Georgia's students. In completing this waiver request, the GaDOE has addressed each waiver submission requirement in section 8401 of the ESSA. Should you have any follow-up questions regarding this submission, please contact Allison Timberlake, Interim Deputy Superintendent for Assessment and Accountability, by phone or email at 404-463-6666 or [atimberlake@doe.k12.ga.us](mailto:atimberlake@doe.k12.ga.us).

Thank you for your consideration.

Sincerely,

Richard Woods  
Georgia's School Superintendent

cc: Georgia's Congressional Delegation

# ESSA MIDDLE SCHOOL WAIVER REQUEST

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## 1.0 GEORGIA'S NEED for a WAIVER

The Georgia Department of Education is requesting a waiver from select statutes and regulations relating to the *Every Student Succeeds Act (ESSA)*. The *ESSA* provides an assessment exception for section 111(b)(2)(B)(v)(I) for middle school students enrolled in advanced mathematics courses (111(b)(2)(C), 34 CFR §200.5(b)). This exception allows eighth-grade students enrolled in an advanced mathematics course who have been administered the end-of-course assessment to be exempted from the eighth-grade end-of-grade assessment.

Georgia is seeking to expand the exception beyond eighth-grade students enrolled in advanced mathematics courses to include all middle school students who are administered an end-of-course assessment for an advanced mathematics, English language arts, or science course. Broadening the exception would support Georgia's commitment to providing students access to challenging academic opportunities and would reinforce State efforts to design and implement assessment and accountability systems that meet the needs of students and educators.

Since Georgia introduced statewide college- and career-ready standards, local educational agencies (LEAs) have increasingly offered middle school students access to advanced academic courses. Under *No Child Left Behind*, middle school students who enrolled in these advanced courses were still required to take the end-of-grade content area assessment. The approval of Georgia's *ESEA* flexibility waiver addressed this double-testing issue by providing an exception for middle school students assessed in advanced mathematics and science courses. With the authorization of the *ESSA*, the exception was narrowed to include only eighth-grade students in advanced mathematics courses.

In Georgia, the exception provided to middle school students enrolled in advanced courses has been a very positive experience for Georgia's students, families, and educators. In requesting a broader scope for the exception, the GaDOE is seeking to provide these benefits to thousands of students, parents, and educators not covered currently under this *ESSA* exception.

## 2.0 WAIVER REQUEST PLAN

State educational agencies seeking a waiver are required to include a plan addressing 8401(b) of the *ESSA*. The GaDOE has addressed each of these requirements in sections 2.1 to 2.8 below.

**2.1 Federal Programs Affected by the Requested Waiver - 8401(b)(1)(A).** The approval of this waiver by the U.S. Department of Education would affect Title I, Part A, Subpart 1 – Basic Program Requirements. Section 111(b)(2)(B)(i)(I) requires “the same academic assessments used to measure the achievement of all public elementary school and secondary school students in the State”. Approval of this waiver would align the consistency of measure for affected students with their course-specific peers rather than their grade-specific peers. Section 111(b)(2)(C) provides an assessment exception for eighth-grade students enrolled in advanced mathematics courses. The approval of this waiver would expand the scope of this program to include all middle school students who are administered end-of-course assessments in mathematics, English language arts, and science. The GaDOE has not identified any negative consequences to the State's assessment and accountability systems, or to students and educators, that would result from the approval of this requested programmatic change.

**2.2 Federal Statutory or Regulatory Requirements to be Waived - 8401(b)(1)(B).** The GaDOE is requesting a modification of the assessment requirements in section 111(b)(2)(B)(v), which detail the required frequency of assessments in mathematics, English language arts, and science. The request would broaden the advanced mathematics exception (111(b)(2)(C) and 34 CFR § 200.5(b)(4)) to include

all middle school students administered end-of-course assessments in mathematics, English language arts, and science.

Section 1111(b)(2)(B)(v)(I) of the *ESSA* requires mathematics and English language arts assessments be administered annually in third through eighth grades and at least once in ninth through twelfth grades. The approval of this waiver would not exempt any sixth through eighth grade students enrolled in advanced courses from the annual assessment requirement. However, it would align the annual requirement with students' courses rather than their grades. Because Georgia administers two end-of-course assessments in each content area, students completing an advanced course in middle school will be assessed again when they take the next course in the sequence.

Section 1111(b)(2)(B)(v)(II) of the *ESSA* requires students to be assessed in science at least once from third through fifth grades, at least once from sixth through ninth grades, and at least once from tenth through twelfth grades. The approval of this waiver would not affect the assessment requirement for third through fifth grades. For students in sixth through ninth grades, the waiver would align the assessment requirement with students' courses rather than their grades. Because Georgia administers two end-of-grade course assessments in science, students completing an advanced course in middle school will be assessed again when they take the next course in the sequence.

In requesting the advanced mathematics exception in the consolidated state plan, the GaDOE was required to ensure the following<sup>1</sup>:

- Students receiving the exception will be administered the end-of-course assessment administered to high school students under section 1111(b)(2)(B)(v)(I)(bb) of the *ESEA*;
- Student performance on the high school assessment will be used in the year in which students take the assessment for purposes of measuring academic achievement under section 1111(c)(4)(B)(i) of the *ESEA* and participation in assessments under section 1111(c)(4)(e) of the *ESEA*;
- While in high school, students will be assessed via a State-administered end-of-course assessment or nationally recognized high school academic assessment as defined in 34 CFR § 200.3(d) that is more advanced than the assessment the State administers under section 1111(b)(2)(B)(v)(I)(bb) of the *ESEA*;
- The State will provide appropriate accommodations consistent with 34 CFR § 200.6(b) and (f); and
- Students' performance on the more advanced assessment will be used for the purposes of measuring academic achievement under section 1111(c)(4)(B)(i) of the *ESEA* and participation in assessments under section 1111(c)(4)(E) of the *ESEA*.

The GaDOE will apply the assessment and reporting requirements above to all students affected by this waiver.

**2.3 Advancing Student Achievement - 8401(b)(1)(C).** The approval of this waiver would advance student achievement in Georgia in multiple ways. Expanding the assessment exception would ensure that middle school students enrolled in advanced courses would take assessments aligned with the academic content taught during the year. Approving this waiver would also reduce the instructional and time burdens placed on students and teachers resulting from double-testing. In 2017, 22,334 eighth-grade students were assessed across Georgia using end-of-course mathematics courses. *ESSA's* middle school exception would have exempted such students from end-of-grade double-testing. However, in the same

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<sup>1</sup> Georgia's 2017 State Consolidated Plan, page 6.

year, more than 37,000 end-of-course tests were administered to middle school students who would not have been covered under the *ESSA* exception but would be covered under this waiver request.

The approval of this waiver would also support equity in educational opportunity. Double-testing serves as a disincentive to students considering advanced courses. Eliminating this disincentive would, in keeping with the *ESSA* exception requirement to provide all students in the State the opportunity to take advanced coursework in middle school (CFR § 200.5(b)(4)), reduce access barriers to advanced courses. Additionally, by enrolling in advanced courses in middle school, students have increased opportunities for even more advanced academic coursework in high school, including Advanced Placement<sup>2</sup>, International Baccalaureate, dual enrollment<sup>3</sup>, and other college credit opportunities. These programs reinforce equity in postsecondary access by providing economically disadvantaged or potential first generation college students with free or low-cost opportunities to begin earning college credits while in high school.

**2.4 Monitoring and Evaluation of Implementation Effectiveness - 8401(b)(1)(D).** The GaDOE will monitor annually middle school enrollment and testing in advanced courses in mathematics, English language arts, and science. The GaDOE will include a summary of this data in its waiver renewal to the U.S. Department of Education (see 2.7 below). Key questions to be answered include the following:

- What were the trends in enrollment of middle school students in advanced mathematics, English language arts, and science courses?
- How did middle school students enrolled in advanced mathematics, English language arts, and science courses perform on end-of-course assessments?
- Were any negative consequences identified for students that resulting from the broadening of the assessment exception?

**2.5 Continuation of Assistance to Student Populations - (8401(b)(1)(F).** The GaDOE will provide support to schools to ensure middle school students, including those from traditionally under-represented subgroups, have the opportunity for advanced coursework. The GaDOE will provide resources and strategies to LEAs and schools to ensure all middle school students are provided the opportunity to be prepared for and to take advanced coursework in middle school (CFR § 200.5(b)(4)).

**2.6 Impact on Academic Standards, Assessments, and Reporting – 8401(b)(1)(F).** The proposed expansion of the exception for advanced mathematics in middle school would have no impact on 1111(b). However, approval of the waiver would support the intent of 1111(b) by removing the double-testing barrier and reinforcing the commitment to providing students with challenging academic standards and assessments. Similarly, the approval of this waiver request would have no impact on 1111(h) or on the reporting of student subgroups identified in 1111(b)(2)(B)(xi).

**2.7 Public Comment and Feedback – 8401(b)(3)(A)(i) – (iii).** LEAs and the public received reasonable opportunity to provide feedback prior to the submission of this waiver request. Public comment was open for 30 days, from September 6<sup>th</sup> to October 6<sup>th</sup>, consistent with Georgia State Board of Education rules. Public notice of the waiver, along with a description of the GaDOE's intent to submit the waiver, was posted to the GaDOE website (see B.1 and B.2 in Appendix B). Emails were sent from GaDOE's

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<sup>2</sup> The Governor's Office of Student Achievement in Georgia subsidizes the cost of an AP exam in a STEM subject and the Georgia Department of Education is subsidizing the exam cost for students who qualify for free or reduced priced meals and who also qualify for a College Board reduced exam fee for a non-STEM subject.

<sup>3</sup> Dual enrollment is a program funded through State revenues that provides high school and home study students an opportunity to earn postsecondary credit hours at no cost to students' families while simultaneously meeting high school graduation or home study completion requirements.

Deputy Superintendent of Assessment and Accountability to LEA superintendents (B.3), assessment directors (B.4), curriculum directors (B.5), and Title I directors (B.6). Additionally, notice was sent to members of the State Superintendent's Parent Advisory Council and parent groups (B.7).

Appendix C includes the 14 emails received during the public comment period. Thirteen of the respondents expressed support for the waiver request. One respondent requested that LEAs be allowed to decide whether a student is administered an end-of-grade or end-of-course assessment. Two respondents who expressed support for the waiver also stated their concern regarding the impact its approval would have on school accountability measures.

The GaDOE responded to these concerns by stating that there is no reason to believe that expanding the exception will negatively impact school accountability measures. Research conducted by the GaDOE prior to ESEA flexibility showed that the performance of middle school students enrolled in advanced coursework was better, on average, for end-of-course assessments aligned to completed courses than end-of-grade assessments covering content not taught to students during the academic year.

**2.8 Duration and Extension of Waiver – 8401(d)(1) and (2).** The GaDOE is requesting this waiver be approved for four years, the maximum allowable period for a waiver under *ESSA* (8401(d)(1)). The GaDOE also anticipates submitting a waiver extension request showing the waiver's success in contributing to improved student achievement (8401(d)(2)(A)) and that such an extension will be in the public interest (8401(d)(2)(A)).

### **3.0 EDUCATING GEORGIA'S FUTURE**

In the *ESSA* consolidated state plan, the GaDOE has developed a broad and ambitious vision for elementary and secondary education across Georgia. Realizing this vision will require a commitment to policies and practices that support improvements in student achievement and academic outcomes. A broadening of the middle school exception, as proposed in this waiver request, will be of great importance as the State moves forward with the implementation of *ESSA* programs and requirements.

**APPENDIX A: Middle School End-of-Course Participation Data**

	<b>Number Tested</b>	<b>Beginning Learner (%)</b>	<b>Developing Learner (%)</b>	<b>Proficient Learner (%)</b>	<b>Distinguished Learner (%)</b>	<b>Proficient and Above (%)</b>
English Language Arts	5,368	1.8	12.7	61.2	24.4	85.6
Mathematics	22,826	3.6	20.1	45.6	30.7	76.3
Science	32,008	12.9	23.2	44.4	19.5	63.9

## **APPENDIX B: Public Notice**

### **B.1: Public Notice Document**

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#### **Public Notice on ESSA Waiver for the Expansion of the Middle School Assessment Flexibility**

The Georgia Department of Education (GaDOE) Assessment and Accountability Office is seeking comments on the following waiver request for the *Elementary and Secondary Education Act* (ESEA), as amended by the *Every Student Succeeds Act* (ESSA), which will be submitted to the U.S. Department of Education (US ED). Comments and questions should be submitted to Melissa Fincher, Deputy Superintendent for Assessment and Accountability, at [mfincher@doe.k12.ga.us](mailto:mfincher@doe.k12.ga.us) **no later than Friday, October 6, 2017.**

Under ESSA (1111(b)(2)(C)), States are provided the flexibility of exempting eighth-grade students from their end-of-*grade* mathematics assessment provided a) those students have completed a high school mathematics course and are administered the end-of-*course* assessment associated with that course and, b) their performance on the assessment is used in the state accountability system the year the student takes the assessment to measure academic achievement. Georgia will implement this flexibility during the 2017-2018 school year; however, the State believes the exception is not sufficiently inclusive given the allowable flexibility is limited to grade 8 students completing high school mathematics coursework.

Georgia is submitting a waiver to US ED to request that this exception in mathematics for eighth grade [1111(b)(2)(C); § 200.5(b)] be applied to any middle school student completing a high school mathematics course associated with an end-of-course assessment and to any middle school student who completes a high school English language arts or science course associated with an end-of-course assessment. Prior to the enactment of ESSA, Georgia's ESEA waiver provided an exception for all middle school students completing high school courses in mathematics and science that ensured these students were assessed only once using the end-of-course assessment.

In submitting this ESSA waiver, the State is seeking similar flexibility from US ED to ensure that Georgia is promoting the expansion of advanced learning for middle school students. During the 2016-2017 school year, there were 60,537 end-of-course tests administered to middle school students. Only 22,648 of these tests were taken in mathematics by eighth grade students. The remaining 37,889 tests would not have been covered under ESSA's current middle school exception and would increase the testing burden for students and schools. The application of additional flexibility across all middle school grades and for three content areas (language arts, mathematics, and science) will further Georgia's commitment to providing accelerated learning opportunities for all students while eliminating the burden of double testing (i.e., middle school students having to take both the end-of-grade and end-of-course assessments). Furthermore, such flexibility will promote a more accurate measure of school performance given students will be assessed on the content standards for which they have received instruction.

Prior to submitting this ESSA waiver request, public notice is being provided to education stakeholders across Georgia. The State is providing notification by posting an intent to request a waiver on the GaDOE website. In addition, the State has emailed information pertaining to the waiver to all district superintendents, assessment directors, curriculum directors, and Title I directors. Copies of all comments the State may receive from stakeholders in response to this notice will be attached to the waiver request sent to US ED.

## B.2: Public Notice Website Location



Georgia Department of Education

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**Richard Woods**, Georgia's School Superintendent

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[Title I Annual Reports](#)

[Title I Webinars, Workshops and Conferences](#)

### Title I, Part A - Improving the Academic Achievement of the Disadvantaged

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#### LEA Monitoring and Technical Assistance Unit

The Title I, Part A Technical Assistance and Monitoring unit provides technical assistance, resources, and program monitoring of local education agencies to ensure that all children have an opportunity to obtain a high quality education and to achieve proficiency on high academic standards.

Title I, Part A is a part of the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (ESSA). This Act provides federal funds through the Georgia Department of Education to local educational agencies (LEAs) and public schools with high numbers or percentages of poor children to help ensure that all children meet challenging State academic content and student academic achievement standards.

LEAs target the Title I, Part A funds they receive to public schools with the highest percentages of children from low-income families. These funds may be used for children from preschool aged to high school. Title I, Part A is designed to support State and local school reform efforts tied to challenging State academic standards in order to reinforce and enhance efforts to improve teaching and learning for students. Title I, Part A programs must be based on effective means of improving student achievement and include strategies to support parental involvement.

#### Contact Information

**Randy Phillips**  
Program Manager  
Title I, Part A  
Phone: 404-463-1955  
[rphillips@doe.k12.ga.us](mailto:rphillips@doe.k12.ga.us)

**Ken Banter**  
Program Manager  
Title I, Part A  
Phone: 404-463-3467  
[kbanter@doe.k12.ga.us](mailto:kbanter@doe.k12.ga.us)

#### Federal Programs' Links

- Public Notice of ESSA Waiver for the Expansion of the Middle School Assessment Flexibility
- Complaint/Comment
- ESEA Flexibility Waiver
- Professional Qualifications

**B.3: Public Notice – Email to Superintendents**

**From:** Melissa Fincher  
**Sent:** Wednesday, September 06, 2017 9:28 AM  
**To:** K12 Superintendents; K12 Charter School Superintendents  
**Cc:** Richard Woods; Matt Jones; Meghan Frick; Caitlin Dooley; Allison Timberlake  
**Subject:** ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC  
**Importance:** High

Superintendents:

The Georgia Department of Education (GaDOE) will be seeking a waiver from the U.S. Department of Education (US ED) to expand the Every Student Succeeds Act's (ESSA) eighth-grade advanced mathematics assessment flexibility (1111(b)(2)(C)). Under this flexibility, eighth-grade students who complete a high school mathematics course and are administered the end-of-course assessment are not required to be double tested by taking the grade 8 end-of-grade mathematics assessment.

The State's waiver will request that US ED approve the expansion of this flexibility to include any middle school student (grades 6, 7 and 8) completing a high school course associated with an end-of-course assessment in English language arts, mathematics, and science. The approval of this waiver would ensure that these students are not required to take the end-of-grade assessment for the content areas in which they have completed a high school course and been administered an end-of-course assessment.

Prior to submitting the waiver, the GaDOE is seeking comments from local education agencies (LEAs) and the public.

In submitting the waiver, the GaDOE is requesting that US ED allow the state to reduce the testing burden for those middle school students who enroll in and complete advanced, high-school course work while still enrolled in middle school. Under an approved waiver, middle school students who take advanced, high-school courses associated with an end-of-course assessment would take only the associated end-of-course assessment and not be required to also take the associated content area end-of-grade assessment for their enrolled grade. The application of additional flexibility across all middle school grades and for three content areas (English language arts, mathematics, and science) will further Georgia's commitment to providing accelerated learning opportunities for all students while eliminating the burden of double testing (i.e., middle school students having to take both the end-of-grade and end-of-course assessments). Furthermore, such flexibility will promote a more accurate measure of school performance given students will be assessed on the content standards for which they have received instruction.

Additional waiver details are available in the public notice of the intent to apply for a waiver (attached and posted at <http://www.gadoe.org/School-Improvement/Federal-Programs/title-i/Pages/Disadvantaged-Children.aspx>, under the heading 'Federal Programs' Links').

If you have any comments or questions pertaining to this waiver, please send them to me by Friday, October 6, 2017.

Thank you.

Melissa Fincher, Ph.D.  
Deputy Superintendent for Assessment & Accountability  
Georgia Department of Education  
1554 Twin Towers East  
205 Jesse Hill Jr. Drive SE  
Atlanta, GA 30334  
404-651-9405  
[mfincher@doe.k12.ga.us](mailto:mfincher@doe.k12.ga.us)  
<http://www.gadoe.org>

**B.4: Public Notice – Email to Assessment Directors**

**From:** Melissa Fincher  
**Sent:** Wednesday, September 06, 2017 9:32 AM  
**To:** K12 Assessment Directors  
**Cc:** Richard Woods; Matt Jones; Meghan Frick; Allison Timberlake  
**Subject:** ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC  
**Attachments:** Middle School Waiver Public Notice - 2017 08 22.pdf  
**Importance:** High

Assessment Directors:

The Georgia Department of Education (GaDOE) will be seeking a waiver from the U.S. Department of Education (US ED) to expand the Every Student Succeeds Act's (ESSA) eighth-grade advanced mathematics assessment flexibility (1111(b)(2)(C)). Under this flexibility, eighth-grade students who complete a high school mathematics course and are administered the end-of-course assessment are not required to be double tested by taking the grade 8 end-of-grade mathematics assessment.

The State's waiver will request that US ED approve the expansion of this flexibility to include any middle school student (grades 6, 7 and 8) completing a high school course associated with an end-of-course assessment in English language arts, mathematics, and science. The approval of this waiver would ensure that these students are not required to take the end-of-grade assessment for the content areas in which they have completed a high school course and been administered an end-of-course assessment.

Prior to submitting the waiver, the GaDOE is seeking comments from local education agencies (LEAs) and the public.

In submitting the waiver, the GaDOE is requesting that US ED allow the state to reduce the testing burden for those middle school students who enroll in and complete advanced, high-school course work while still enrolled in middle school. Under an approved waiver, middle school students who take advanced, high-school courses associated with an end-of-course assessment would take only the associated end-of-course assessment and not be required to also take the associated content area end-of-grade assessment for their enrolled grade. The application of additional flexibility across all middle school grades and for three content areas (English language arts, mathematics, and science) will further Georgia's commitment to providing accelerated learning opportunities for all students while eliminating the burden of double testing (i.e., middle school students having to take both the end-of-grade and end-of-course assessments). Furthermore, such flexibility will promote a more accurate measure of school performance given students will be assessed on the content standards for which they have received instruction.

Additional waiver details are available in the public notice of the intent to apply for a waiver (attached and posted at <http://www.gadoe.org/School-Improvement/Federal-Programs/title-i/Pages/Disadvantaged-Children.aspx>, under the heading 'Federal Programs' Links').

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Thank you.

Melissa Fincher, Ph.D.  
Deputy Superintendent for Assessment & Accountability  
Georgia Department of Education  
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205 Jesse Hill Jr. Drive SE  
Atlanta, GA 30334  
404-651-9405  
[mfincher@doe.k12.ga.us](mailto:mfincher@doe.k12.ga.us)  
<http://www.gadoe.org>

**B.5: Public Notice – Curriculum Directors**

**From:** Melissa Fincher  
**Sent:** Wednesday, September 06, 2017 9:33 AM  
**To:** K12 Curriculum Directors  
**Cc:** Richard Woods; Matt Jones; Caitlin Dooley; Pamela Smith; Meghan Frick; Allison Timberlake  
**Subject:** ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC  
**Attachments:** Middle School Waiver Public Notice - 2017 08 22.pdf  
**Importance:** High

Curriculum Directors:

The Georgia Department of Education (GaDOE) will be seeking a waiver from the U.S. Department of Education (US ED) to expand the Every Student Succeeds Act's (ESSA) eighth-grade advanced mathematics assessment flexibility (1111(b)(2)(C)). Under this flexibility, eighth-grade students who complete a high school mathematics course and are administered the end-of-course assessment are not required to be double tested by taking the grade 8 end-of-grade mathematics assessment.

The State's waiver will request that US ED approve the expansion of this flexibility to include any middle school student (grades 6, 7 and 8) completing a high school course associated with an end-of-course assessment in English language arts, mathematics, and science. The approval of this waiver would ensure that these students are not required to take the end-of-grade assessment for the content areas in which they have completed a high school course and been administered an end-of-course assessment.

Prior to submitting the waiver, the GaDOE is seeking comments from local education agencies (LEAs) and the public.

In submitting the waiver, the GaDOE is requesting that US ED allow the state to reduce the testing burden for those middle school students who enroll in and complete advanced, high-school course work while still enrolled in middle school. Under an approved waiver, middle school students who take advanced, high-school courses associated with an end-of-course assessment would take only the associated end-of-course assessment and not be required to also take the associated content area end-of-grade assessment for their enrolled grade. The application of additional flexibility across all middle school grades and for three content areas (English language arts, mathematics, and science) will further Georgia's commitment to providing accelerated learning opportunities for all students while eliminating the burden of double testing (i.e., middle school students having to take both the end-of-grade and end-of-course assessments). Furthermore, such flexibility will promote a more accurate measure of school performance given students will be assessed on the content standards for which they have received instruction.

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1554 Twin Towers East  
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Atlanta, GA 30334  
404-651-9405  
[mfincher@doe.k12.ga.us](mailto:mfincher@doe.k12.ga.us)  
<http://www.gadoe.org>

**B.6: Public Notice – Title I Directors**

**From:** Melissa Fincher  
**Sent:** Wednesday, September 06, 2017 9:34 AM  
**To:** K12 Title I Directors  
**Cc:** Richard Woods; Matt Jones; Deborah Gay; Craig Geers; John Wight; Meghan Frick; Allison Timberlake  
**Subject:** ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC  
**Attachments:** Middle School Waiver Public Notice - 2017 08 22.pdf  
**Importance:** High

Title I Directors:

The Georgia Department of Education (GaDOE) will be seeking a waiver from the U.S. Department of Education (US ED) to expand the Every Student Succeeds Act's (ESSA) eighth-grade advanced mathematics assessment flexibility (1111(b)(2)(C)). Under this flexibility, eighth-grade students who complete a high school mathematics course and are administered the end-of-course assessment are not required to be double tested by taking the grade 8 end-of-grade mathematics assessment.

The State's waiver will request that US ED approve the expansion of this flexibility to include any middle school student (grades 6, 7 and 8) completing a high school course associated with an end-of-course assessment in English language arts, mathematics, and science. The approval of this waiver would ensure that these students are not required to take the end-of-grade assessment for the content areas in which they have completed a high school course and been administered an end-of-course assessment.

Prior to submitting the waiver, the GaDOE is seeking comments from local education agencies (LEAs) and the public.

In submitting the waiver, the GaDOE is requesting that US ED allow the state to reduce the testing burden for those middle school students who enroll in and complete advanced, high-school course work while still enrolled in middle school. Under an approved waiver, middle school students who take advanced, high-school courses associated with an end-of-course assessment would take only the associated end-of-course assessment and not be required to also take the associated content area end-of-grade assessment for their enrolled grade. The application of additional flexibility across all middle school grades and for three content areas (English language arts, mathematics, and science) will further Georgia's commitment to providing accelerated learning opportunities for all students while eliminating the burden of double testing (i.e., middle school students having to take both the end-of-grade and end-of-course assessments). Furthermore, such flexibility will promote a more accurate measure of school performance given students will be assessed on the content standards for which they have received instruction.

Additional waiver details are available in the public notice of the intent to apply for a waiver (attached and posted at <http://www.gadoe.org/School-Improvement/Federal-Programs/title-i/Pages/Disadvantaged-Children.aspx>, under the heading 'Federal Programs' Links').

If you have any comments or questions pertaining to this waiver, please send them to me by Friday, October 6, 2017.

Thank you.

Melissa Fincher, Ph.D.  
Deputy Superintendent for Assessment & Accountability  
Georgia Department of Education  
1554 Twin Towers East  
205 Jesse Hill Jr. Drive SE  
Atlanta, GA 30334  
404-651-9405  
[mfincher@doe.k12.ga.us](mailto:mfincher@doe.k12.ga.us)  
<http://www.gadoe.org>

**B.7: Public Notice – Family-School Partnerships**

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Parent Advisory Council updates!

[View this email in your browser](#)



## **Reminder to Submit your Comments on the Waiver for Expansion of Middle School Assessment Flexibility**

**Dear Former and Current State School  
Superintendent's Parent Advisory Council:**

The Georgia Department of Education (GaDOE) Assessment and Accountability Office is seeking comments on the following waiver request for the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA). The waiver request will be submitted to the U.S. Department of Education. Please click on the link to review the public notice.

**Due Friday, 10/6/17**

[Public Notice on ESSA Waiver for the Expansion of the Middle School Assessment Flexibility](#)

If you have not already done so, please review the waiver request and send your comments and questions to Melissa Fincher, Deputy Superintendent for Assessment and Accountability, at [mfincher@doe.k12.ga.us](mailto:mfincher@doe.k12.ga.us).

**APPENDIX C: Public Comments and GaDOE Responses**

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**From:** Kristy Collins-Rylander <Kristy.Rylander@sccpss.com>  
**Sent:** Friday, October 06, 2017 1:30 PM  
**To:** Melissa Fincher  
**Subject:** RE: ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC

Good afternoon, Dr. Fincher,

We are pleased to hear of the request to expand ESSA's 8<sup>th</sup> grade advanced mathematics assessment flexibility to cover science and ELA in addition to math. We fully support the Department's goal of reducing the double-testing that has affected our middle grades students enrolled in EOC courses in the past, especially as our district has worked to increase the number of middle grades students completing high school level courses.

Our only concern with this flexibility is regarding the use of the EOC scores to calculate CCRPI Content Mastery. While the middle school students' EOC scores do count toward Content Mastery in the flexibility areas, those scores carry the same weight as scores for students taking the EOG. Our district would like to see some differentiation for the EOC score weights in recognition of the higher level of rigor at which these middle grades students are working. We have some concern that the existing model may create a disincentive for schools and districts to expand accelerated learning opportunities for middle grades students based on an expectation that some students would perform better on the EOG than on the EOC. However, I assure you that regardless of how EOC and EOG scores are weighted within CCRPI Content Mastery moving forward, Chatham County will continue its practice of increasing opportunities for middle grades students to complete high school courses, in support of expanding advanced learning options for students at all levels.

Thank you for your time, consideration, and all the work you do to support our district and those across the state.

Kristy

Kristy Collins-Rylander  
Interim Senior Director – Accountability, Assessment, & Reporting Services  
Savannah-Chatham County Public School System  
912-395-5735

**From:** Jeff ROGERS <[REDACTED]@bellsouth.net>  
**Sent:** Wednesday, October 04, 2017 11:46 AM  
**To:** Melissa Fincher  
**Subject:** Comments on the Waiver for Expansion of Middle School Assessment Flexibility

Melissa:

Good morning. I served on the Parental Advisory Council representing Coweta County a few years back and enjoyed my time on the board.

I have reviewed the one page document and I agree with the asking of the Waiver. I feel that any 8th grader who has demonstrated that they understand the content of the Math class should be allowed to be exempted from their end of grade assessment. If any 8th grader taking a high school math class, while still in middle school, is doing well and meeting all other requirements...then that child DESERVES to be exempted from the final test and their data included in the state assessments. These kids work hard and this is a sign to them that hard work pays off.

Thank you for your time,

Deborah Rogers

**From:** Harrell, Carol <CHarrell@albanytech.edu>  
**Sent:** Wednesday, October 04, 2017 11:09 AM  
**To:** Melissa Fincher  
**Subject:** Assessment and Flexibility

Good morning,

In my opinion, it would be a disservice to the students in Georgia if we did not submit a waiver. Our students are improving in so many areas and this could possibly be a good opportunity for them to see that we are listening to their concerns and we care. The students in Georgia have so many tests/assessments that they are required to take before advancing to the next grade. I firmly agree that the students should be awarded a waiver if they are taken high school classes and they are in the 8<sup>th</sup> grade.

Thanking you in advance for your time and patience in this matter.  
Carol F. Harrell

---

**From:** wendy underwood <[REDACTED]@gmail.com>  
**Sent:** Monday, September 25, 2017 6:27 PM  
**To:** Melissa Fincher  
**Subject:** Expansion Assessment Flexibility Waiver

Hi Ms. Fincher,

Here's the opinion of a LCSS educator that I hope will be considered.

"I like this idea. I am totally against students having to take two different standardized tests because they are taking a higher level course. They should only take ONE test to see what they know. If they can pass a high school EOC, what is the point of an EOG? "

Gifted Science Teacher

Now for my feedback/response:

As a parent and former PAC member I do believe that we are over testing our students. As a parent whose son is currently taking a high school course while currently in middle school and doing quite well, if he can pass the course and required high school EOC I don't feel it necessary to then retest the student's EOG. I also have a high school student who is doing dual enrollment/MOWR and he had to take the EOC, AP exam, EOG and Final exam for his one class and I just believe that it is a bit excessive to test a student that much and don't see the relevance. Please feel free to look up all my children's education track record. (FYI: I have two [REDACTED], 1 is at [REDACTED] and the other is at [REDACTED], and I have a daughter [REDACTED] at [REDACTED] thank you for contacting me and requesting my feedback. From a student's perspective most of them certainly would agree in favor of flexibility and less testing when I spoke with them.

I have a "Parents Involved In Liberty County Schools" Facebook page and would like to invite you to join the page. It is very informative about what's going on in our LCSS, the accomplishments of our students and greatness of the teachers and community and has over 2,300 parents, teachers, community leaders, student/members. I also share important information such as this from the GaDOE. Please send me a request to join and check out the information we share in LCSS. If possible if you could send me a direct link or flyer about this flexibility assessment I'd love to post it to the page and get other parents and students' feedback. I'm always willing to help in any way I can. My contact information is [REDACTED]@gmail.com or [REDACTED]. Thanks again for including me.

Sincerely,  
Mrs. Wendy T Underwood

**From:** Cindy Brogan <[REDACTED]@gmail.com>  
**Sent:** Thursday, September 14, 2017 11:43 AM  
**To:** Melissa Fincher  
**Subject:** Public Notice on ESSA Waiver

As a parent of a now 9th grader and a current 8th grader taking accelerated coursework, I would like to thank you for taking students's needs into consideration.

The testing time can be very burdensome for accelerated students who are mandated to take extra coursework.

I fully support the ESSA waiver regarding reduction of middle school testing for accelerated coursework.

**From:** Stephanie Moss <stephaniemoss@townscountyschools.org>  
**Sent:** Thursday, September 07, 2017 10:12 AM  
**To:** Melissa Fincher  
**Subject:** Re: ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC

Thank you for applying for the waiver. Requiring these students to take 2 tests would not be beneficial to the students. They sometimes see that as a punishment for taking an advanced class.

On Wed, Sep 6, 2017 at 9:32 AM, Melissa Fincher <[MFincher@doe.k12.ga.us](mailto:MFincher@doe.k12.ga.us)> wrote:

Curriculum Directors:

The Georgia Department of Education (GaDOE) will be seeking a waiver from the U.S. Department of Education (US ED) to expand the Every Student Succeeds Act's (ESSA) eighth-grade advanced mathematics assessment flexibility (1111(b)(2)(C)). Under this flexibility, eighth-grade students who complete a high school mathematics course and are administered the end-of-course assessment are not required to be double tested by taking the grade 8 end-of-grade mathematics assessment.

The State's waiver will request that US ED approve the expansion of this flexibility to include any middle school student (grades 6, 7 and 8) completing a high school course associated with an end-of-course assessment in English language arts, mathematics, and science. The approval of this waiver would ensure that these students are not required to take the end-of-grade assessment for the content areas in which they have completed a high school course and been administered an end-of-course assessment.

Prior to submitting the waiver, the GaDOE is seeking comments from local education agencies (LEAs) and the public.

In submitting the waiver, the GaDOE is requesting that US ED allow the state to reduce the testing burden for those middle school students who enroll in and complete advanced, high-school course work while still enrolled in middle school. Under an approved waiver, middle school students who take advanced, high-school courses associated with an end-of-course assessment would take only the associated end-of-course assessment and not be required to also take the associated content area end-of-grade assessment for their enrolled grade. The application of additional flexibility across all middle school grades and for three content areas (English language arts, mathematics, and science) will further Georgia's commitment to providing accelerated learning opportunities for all students while eliminating the burden of double testing (i.e., middle school students having to take both the end-of-grade and end-of-course assessments). Furthermore, such flexibility will promote a more accurate measure of school performance given students will be assessed on the content standards for which they have received instruction.

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If you have any comments or questions pertaining to this waiver, please send them to me by Friday, October 6, 2017.

Thank you.

Melissa Fincher, Ph.D.

Deputy Superintendent for Assessment & Accountability

Georgia Department of Education

1554 Twin Towers East

205 Jesse Hill Jr. Drive SE

Atlanta, GA 30334

[404-651-9405](tel:404-651-9405)

[mfincher@doe.k12.ga.us](mailto:mfincher@doe.k12.ga.us)

<http://www.gadoe.org>

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--

Stephanie Moss  
Curriculum/Personnel Director  
Towns County Board of Education  
67 Lakeview Circle, Suite C  
Hiawassee, GA 30546  
706.896.2279 – Phone  
706.896.2632 – Fax

**From:** Arends, Lisa <LArends@forsyth.k12.ga.us>  
**Sent:** Wednesday, September 06, 2017 7:49 PM  
**To:** Melissa Fincher  
**Subject:** RE: ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC

I've taught 8th accelerated math both with and without the additional requirement of taking the 8th grade test. I have noticed not only an improvement in the students academically without the addition of the 8th grade test, but also in their general attitude about school. I fully support continuing to waive the requirement of taking additional tests that are either duplicates or irrelevant for these students.

Thank you,  
Lisa Arends  
DeSana Middle School

---

**From:** Mercer, Karl <KMercer@forsyth.k12.ga.us>  
**Sent:** Wednesday, September 06, 2017 4:58 PM  
**To:** Melissa Fincher  
**Cc:** Kieffer, Beth  
**Subject:** FW: ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC  
**Attachments:** Middle School Waiver Public Notice - 2017 08 22.pdf  
**Importance:** High

Melissa,

I hope you are doing well. I am in support of this waiver. This will lessen the stress on these children of having to take two assessments. It also ensures the standards of the assessment match the standards of the instruction. Have a great day!

**Karl Mercer**  
**Principal**  
**West Forsyth High School**

Follow me on Twitter @mercer\_karl



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**Innovative**

**Leaders**

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**From:** Dr. Al Pollard <apollard@pulaski.k12.ga.us>  
**Sent:** Wednesday, September 06, 2017 3:01 PM  
**To:** Melissa Fincher  
**Subject:** RE: ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC

Ms. Fincher,

I believe that the system should have the choice of whether to test these students with the EOC and the EOG.

Al Pollard, Ed.d  
Superintendent  
Pulaski County Schools

**From:** Lisa Hackney <Lisa.Hackney@dalton.k12.ga.us>  
**Sent:** Wednesday, September 06, 2017 2:01 PM  
**To:** Melissa Fincher  
**Subject:** ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC

Dalton Public Schools is in favor of the Georgia DOE ESSA Waiver request for middle school students taking high school courses associated with an EOC. Assessments should address standards covered and requiring additional testing with no benefit to the student is simply not in the best interest of our advanced learners.

*Lisa*

Lisa Hackney, Ed.D.  
Director of School Support  
300 W. Waugh St.  
Dalton, GA 30720  
706-876-4586



*Don't be pushed by your problems. Be led by your dreams.*

---

**From:** Raymond Braziel <raymond.braziel@lamar.k12.ga.us>  
**Sent:** Wednesday, September 06, 2017 1:54 PM  
**To:** Melissa Fincher  
**Subject:** Re: ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC

Thank you for the update and it does help.

Raymond Braziel, Ed. S  
Director of Curriculum, Instruction and Professional Learning  
Lamar County Schools  
100 Victory Lane  
Barnesville, GA 30204  
Office: 770-358-5891  
FAX: 770-358-5858

Learn today to succeed tomorrow!

On Wed, Sep 6, 2017 at 1:49 PM, Melissa Fincher <[MFincher@doe.k12.ga.us](mailto:MFincher@doe.k12.ga.us)> wrote:

Hi Raymond,

This flexibility has been implemented for the last two years under our ESEA waiver. I am not aware of any dips in CCRPI scores due to the implementation of this flexibility, which began in 2016. As you mention, these students are typically high-achieving and as such, they tend to do as well on the EOCs as they do on the EOGs. In many cases, students actually perform better on the EOCs because the test matches the instruction they have received (i.e., the high-school course).

The only thing new with the waiver requested below (and by new, I mean something that has not been previously implemented in Georgia based on our former ESEA waiver) is that we are seeking to include ELA (previously the flexibility was granted in mathematics and science).

I hope this helps alleviate the concerns, but please let me know if the concerns remain....and please let me know if you have additional questions.

Melissa Fincher, Ph.D.

Deputy Superintendent for Assessment & Accountability

Georgia Department of Education

1554 Twin Towers East

205 Jesse Hill Jr. Drive SE

Atlanta, GA 30334

[404-651-9405](tel:404-651-9405)

[mfincher@doe.k12.ga.us](mailto:mfincher@doe.k12.ga.us)

<http://www.gadoe.org>

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**From:** Raymond Braziel [mailto:[raymond.braziel@lamar.k12.ga.us](mailto:raymond.braziel@lamar.k12.ga.us)]

**Sent:** Wednesday, September 6, 2017 1:22 PM

**To:** Melissa Fincher <[MFincher@doe.k12.ga.us](mailto:MFincher@doe.k12.ga.us)>

**Cc:** Jute Wilson <[jute.wilson@lamar.k12.ga.us](mailto:jute.wilson@lamar.k12.ga.us)>

**Subject:** Re: ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC

Good Afternoon Dr. Fincher,

Often times, students who take advanced level classes in middle school are some of the brighter students and if they don't take the end of grade tests in middle school, I believe that schools will begin to see a dip in their CCRPI scores for achievement. Which leads to my question if this waiver is approved, how will this change impact CCRPI scores for middle schools? I can see small systems being negatively impacted the most by a change like this. As a former middle school principal and knowing that 40% of my evaluation and 30% of a teacher's evaluation is based on test scores, this would be a tough sell and I fully understand that students benefit the most but as a principal or teacher our jobs could be on the line.

Thank You,

Raymond Braziel, Ed. S

Director of Curriculum, Instruction and Professional Learning

Lamar County Schools

100 Victory Lane

Barnesville, GA 30204

Office: [770-358-5891](tel:770-358-5891)

FAX: [770-358-5858](tel:770-358-5858)

On Wed, Sep 6, 2017 at 9:31 AM, Melissa Fincher <[MFincher@doe.k12.ga.us](mailto:MFincher@doe.k12.ga.us)> wrote:

Assessment Directors:

The Georgia Department of Education (GaDOE) will be seeking a waiver from the U.S. Department of Education (US ED) to expand the Every Student Succeeds Act's (ESSA) eighth-grade advanced mathematics assessment flexibility (1111(b)(2)(C)). Under this flexibility, eighth-grade students who complete a high school mathematics course and are administered the end-of-course assessment are not required to be double tested by taking the grade 8 end-of-grade mathematics assessment.

The State's waiver will request that US ED approve the expansion of this flexibility to include any middle school student (grades 6, 7 and 8) completing a high school course associated with an end-of-course assessment in English language arts, mathematics, and science. The approval of this waiver would ensure that these students are not required to take the end-of-grade assessment for the content areas in which they have completed a high school course and been administered an end-of-course assessment.

Prior to submitting the waiver, the GaDOE is seeking comments from local education agencies (LEAs) and the public.

In submitting the waiver, the GaDOE is requesting that US ED allow the state to reduce the testing burden for those middle school students who enroll in and complete advanced, high-school course work while still enrolled in middle school. Under an approved waiver, middle school students who take advanced, high-school courses associated with an end-of-course assessment would take only the associated end-of-course assessment and not be required to also take the associated content area end-of-grade assessment for their enrolled grade. The application of additional flexibility across all middle school grades and for three content areas (English language arts, mathematics, and science) will further Georgia's commitment to providing accelerated learning opportunities for all students while eliminating the burden of double testing (i.e., middle school students having to take both the end-of-grade and end-

of-course assessments). Furthermore, such flexibility will promote a more accurate measure of school performance given students will be assessed on the content standards for which they have received instruction.

Additional waiver details are available in the public notice of the intent to apply for a waiver (attached and posted at <http://www.gadoe.org/School-Improvement/Federal-Programs/title-i/Pages/Disadvantaged-Children.aspx>, under the heading 'Federal Programs' Links').

If you have any comments or questions pertaining to this waiver, please send them to me by Friday, October 6, 2017.

Thank you.

Melissa Fincher, Ph.D.

Deputy Superintendent for Assessment & Accountability

Georgia Department of Education

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<http://www.gadoe.org>

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**From:** Karey Williams <karey.williams@wcs.ga.net>  
**Sent:** Wednesday, September 06, 2017 12:04 PM  
**To:** Melissa Fincher  
**Subject:** Re: ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC

Melissa,

Thank you for pursuing this option with the US Department of Education. The students who are completing these high school courses are high-performing 8th graders, and it is almost a punishment for them to have to take the EOG for the 8th grade course in addition to the EOC for the course completed. It makes perfect sense that they would not take the EOG for a course in which they did not receive instruction.

Keep up the great work! We appreciate you in Whitfield County!!!!

Karey

**Karey Williams**

Assistant Superintendent of Teaching and Learning  
Whitfield County Schools  
1306 S. Thornton Avenue  
Dalton, GA 30722-2167  
Office: 706-217-6711 Cell: 706-847-7804



**From:** Gottwald, Jim <jim.gottwald@bartow.k12.ga.us>  
**Sent:** Wednesday, September 06, 2017 10:50 AM  
**To:** Melissa Fincher  
**Subject:** RE: ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC

Ms. Fincher,

I have forwarded this e-mail to Dr. Kimberley Fraker, Chief Academic Officer for the Bartow County Schools. I am no longer involved in curriculum decisions.

However, I think this is a great idea.

---

**From:** Schmuhl, Aaryn <Aaryn.Schmuhl@henry.k12.ga.us>  
**Sent:** Wednesday, September 06, 2017 9:41 AM  
**To:** Melissa Fincher  
**Subject:** RE: ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC

Dr. Fincher,

Henry County Schools is in full support of this waiver request and appreciate the advocacy by GADOE to make common sense approaches to assessment and accountability that support students and helps encourage advanced coursework for students in middle grades. We would add one suggestion to consider including 7<sup>th</sup> graders who take advanced course work as well. We have a number of students taking HS Algebra in 7<sup>th</sup> grade who would benefit from a similar waiver.

Thank you again!

Aaryn

---

**From:** Melissa Fincher [mailto:MFincher@doe.k12.ga.us]  
**Sent:** Wednesday, September 6, 2017 9:33 AM  
**To:** Schmuhl, Aaryn <Aaryn.Schmuhl@henry.k12.ga.us>  
**Cc:** Richard Woods <rwoods@doe.k12.ga.us>; Matt Jones <mattjones@doe.k12.ga.us>; Caitlin Dooley <cdooley@doe.k12.ga.us>; Pamela Smith <PamSmith@doe.k12.ga.us>; Meghan Frick <mfrick@doe.k12.ga.us>; Allison Timberlake <ATimberlake@doe.k12.ga.us>  
**Subject:** ESSA Waiver Request for Middle School Students Taking High School Courses Associated with an EOC  
**Importance:** High

Curriculum Directors:

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Georgia's commitment to providing accelerated learning opportunities for all students while eliminating the burden of double testing (i.e., middle school students having to take both the end-of-grade and end-of-course assessments). Furthermore, such flexibility will promote a more accurate measure of school performance given students will be assessed on the content standards for which they have received instruction.

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If you have any comments or questions pertaining to this waiver, please send them to me by Friday, October 6, 2017.

Thank you.

Melissa Fincher, Ph.D.  
Deputy Superintendent for Assessment & Accountability  
Georgia Department of Education  
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## **Addendum to Georgia's ESSA Advanced Middle School Exception Waiver Request**

Georgia is committed to providing accelerated learning opportunities for all students. To provide opportunities for engaging, relevant, and challenging curriculum for all Georgia students, the state provides a variety of advanced academic and career pathway courses that strengthen student readiness for college, careers, and life. Opportunities for advanced coursework are offered to middle school students, primarily but not exclusively in the content area of mathematics. In order to support accelerated models of learning, eliminate extra testing, and ensure testing closely aligns with instruction, Georgia is seeking to expand ESSA's eighth grade mathematics assessment exception to include all middle school students in English language arts, mathematics, and science.

### *End of Course Assessments*

Georgia utilizes the Georgia Milestones End of Course (EOC) Assessments to satisfy federal testing requirements at the high school level. The state requires two assessments, taken upon completion of applicable courses, in each of English language arts, mathematics, science, and social studies:

- English language arts
  - Ninth Grade Literature and Composition
  - American Literature and Composition
- Mathematics
  - Algebra I or Coordinate Algebra
  - Geometry or Analytic Geometry
- Science
  - Biology
  - Physical Science
- Social Studies
  - United States History
  - Economics/Business/Free Enterprise

As demonstrated in Appendix A of Georgia's waiver submission, 5,368 middle school students participated in an EOC in English language arts in 2017. That number is 22,826 in mathematics and 32,008 in science.

### *End of Course Sequencing*

While Georgia requires all students completing applicable courses to participate in the associated EOC assessment, the state does not specify course sequencing. Rather, Local Education Agencies (LEAs) are afforded flexibility regarding course sequencing.

EOC assessments are required in English language arts for Ninth Grade Literature and Composition and American Literature and Composition. While Ninth Grade Literature and Composition is typically a ninth-grade course, increasing numbers of students are completing the course and associated EOC in middle school. American Literature and Composition is typically offered in the tenth or eleventh grade, regardless of when students take Ninth Grade Literature and Composition. Currently, no middle school students take American Literature and Composition.

Georgia provides two sets of EOC assessments for mathematics – Algebra and Geometry (discrete mathematics) or Coordinate Algebra and Analytic Geometry (integrated mathematics). While most students completing Algebra/Coordinate Algebra in middle school will take Geometry/Analytic Geometry in high school, a small number of students (approximately 200-400) may complete both assessments while in middle school. This represents 0.08% - 0.15% of Georgia’s eighth-grade student enrollment. For these students, a defined pathway of higher-level courses is available in high school. These courses include Algebra II, Pre-Calculus, Calculus, and Statistics. As described in the next section, the state provides for one AP assessment for all students. This ensures that all students are provided with a state-funded advanced mathematics assessment in high school.

EOC assessments are required in science for Physical Science and Biology. Physical Science is more commonly taught in middle school as Georgia’s 8<sup>th</sup> grade science standards are also physical science standards. Therefore, many districts and schools choose to offer the high school version of this course. While a large number of students take Physical Science in middle school, only a few hundred students take Biology in middle school. Students may take one of these two science assessments in middle school, but rarely would a student take both in middle school. A variety of additional higher-level courses are available to students in high school. These courses include, but are not limited to, Genetics, Botany, Environmental Science, Epidemiology, Human Anatomy and Physiology, Astronomy, Organic Chemistry, Biochemistry, Physics, Environmental Physics, Robotics, and Scientific Research. Students can also take several AP or IB science courses.

Among other requirements, Georgia requires that students complete four units in English language arts, four units in mathematics, and four units in science in order to earn a regular high school diploma. Therefore all students, regardless of their level of acceleration, have a sufficient opportunity to participate in higher-level courses in these content areas prior to graduation.

### *Higher Level Opportunities*

Georgia is committed to providing accelerated learning opportunities for all students. The Georgia Department of Education ensures this access by utilizing the Georgia Virtual School (GAVS), a supplemental online instructional program. The Georgia Department of Education recommends that GAVS be used as a resource for LEAs, particularly when there are too few students, too few teachers, or the demand is too low to sustain face-to-face course offerings (as is the case in some small, rural LEAs). Students can take courses during the school day or after school hours. Historically, GAVS has been utilized to promote access to advanced coursework, including Advanced placement. GAVS currently offers 26 AP courses, including the following English language arts, mathematics, and science courses:

- AP English Language and Composition, AP English Literature and Composition
- AP Calculus AB, AP Calculus BC, AP Statistics, AP Computer Science A, AP Computer Science Principles
- AP Biology, AP Chemistry, AP Environmental Science, AP Physics C: Mechanics, AP Physics I: Algebra-Based, AP Physics II: Algebra-Based

Additionally, through the Governor’s Office of Student Achievement (GOSA), Georgia funds one Advanced Placement assessment for any student in a Science, Technology, Engineering, or Mathematics (STEM) field. The state funds one AP assessment for low-income students in any field. This ensures that all students not only have access to advanced courses, but they can also participate in the associated

advanced assessment. In addition to funding an AP assessment, the state also pays for all tenth grade public school students to participate in the PSAT.

Allowing students to advance academically while in middle school offers the opportunity for additional advancement or acceleration once enrolled in high school. Students who complete core requirements are eligible to complete additional Advanced Placement courses, as well as enroll in Georgia's highly successful Dual Enrollment Program. Currently, these students earn both high school and postsecondary credit at no cost; the state pays tuition for all dual-enrolled high school students.

Approval of Georgia's request to expand the eighth-grade mathematics exception to include all middle school students in English language arts, mathematics, and science would eliminate unnecessary double testing, ensuring testing aligns with instruction received, and provide students with a clearer path toward accelerated opportunities that better prepare them for college, careers, and life.