



August 25, 2021

The Honorable Miguel Cardona
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Secretary Cardona:

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)). Although Georgia no longer qualifies for the existing exception in eighth-grade mathematics, the State is submitting a waiver request to the U.S. Department of Education for four years (2022-2025 school years), asking that this exception be extended to all eighth-grade students completing the high school physical science course. With the approval of this waiver, eighth-grade students completing the high school physical science course will take the high school physical science assessment aligned to the high school course standards, rather than the grade 8 science end-of-grade exam aligned to eighth grade science standards.

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 students seeking exposure to the high school physical science course. 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 Georgia Department of Education (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, Deputy Superintendent for Assessment and Accountability, by phone or email at (470) 579-3021 or atimberlake@doe.k12.ga.us.

Thank you for your consideration.

Sincerely,

Richard Woods
Georgia's School Superintendent

1554 Twin Towers East • 205 Jesse Hill Jr. Drive • Atlanta, GA 30334 • www.gadoe.org

Richard Woods, Georgia's School Superintendent

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ESSA MIDDLE SCHOOL WAIVER REQUEST

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1.0 GEORGIA'S NEED for a WAIVER

The Georgia Department of Education (GaDOE) 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 (1111(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.

States can pursue this option provided a) those students have completed a high school mathematics course and are administered the end-of-course (EOC) assessment associated with that course, b) their performance on the assessment is used in the year the student takes the assessment to measure academic achievement, and c) in high school the student takes a more advanced high school mathematics assessment. Georgia no longer qualifies for the existing exception in eighth-grade math as the State no longer has a higher-level math test due to recent state legislation reducing the number of EOCs. However, the State is submitting a waiver request to the U.S. Department of Education for four years (2022-2025 school years), asking that this exception be extended to all eighth-grade students completing the high school physical science course. These students will then take the Biology end-of-course assessment in high school.

The State was granted a similar waiver request in 2018. However, this waiver expired at the end of the 2020-2021 school year, and the need for such a waiver remains. In the 2020-2021 school year, 23,203 physical science end-of-course tests were taken by eighth-grade students. Without a waiver, these students would not have been covered under ESSA's existing middle school exception and would have had to take the end-of-grade exam. A new waiver allowing the expansion of the ESSA exception to include all eighth-grade students taking high school physical science will further the State's commitment to providing accelerated learning opportunities for all students. Should this waiver be denied, more than 20,000 eighth grade students that take high school physical science across the state of Georgia each year will be expected to take the grade 8 science end-of-grade exam, which is not aligned to standards for the high school course.

In requesting this waiver, the State assures that it meets all three criteria mentioned above (a, b, and c) for the requested exception for eighth-grade students taking high school physical science, as they will take a more advanced high school science assessment – biology.

In Georgia, the exception provided in the past to middle school students enrolled in advanced courses has been a very positive experience for students, families, and educators. In requesting a continuance of this broader scope for the exception, 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*. 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 1111(b)(2)(B)(i)(I) requires “the same academic assessments [be] 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 1111(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 eighth grade students who are enrolled in the advanced physical science course. 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). GaDOE is requesting a modification of the assessment requirements in section 1111(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 (1111(b)(2)(C) and 34 CFR § 200.5(b)(4)) to include eighth grade students administered the end-of-course assessments in physical science.

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 eighth grade, the waiver would align the assessment requirement with the student's course rather than his grade. Because Georgia administers one end-of-course assessment in science (Biology), students completing high school physical science course in middle school will be assessed again when they take the next course in the sequence.

Georgia will no longer request the advanced mathematics exception in the consolidated state plan, participation in assessments under section 1111(c)(4)(E) of the *ESEA*, as the State is no longer eligible for this exception in mathematics.

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 two important ways. First, expanding the assessment exception ensures that middle school students enrolled in the high school physical science course will take the assessment aligned with the academic content taught during the year.

Additionally, the burden of taking a test not aligned with the standards taught 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 barriers to enrollment in advanced courses.

2.4 Monitoring and Evaluation of Implementation Effectiveness - 8401(b)(1)(D). GaDOE has monitored middle school enrollment and testing in advanced courses in science. Summary data are included in Appendix A. Key questions answered include the following:

- What were the trends in enrollment of middle school students in advanced science course?
- How did middle school students enrolled in high school physical science perform on end-of-course assessments?
- Were any negative consequences identified for students resulting from the broadening of the assessment exception?

GaDOE will continue to monitor and will include a summary of data in its waiver renewal to the U.S. Department of Education.

2.5 Continuation of Assistance to Student Populations - (8401(b)(1)(F). GaDOE will provide support to schools to ensure middle school students, including those from traditionally under-represented subgroups, have the opportunity for advanced coursework. 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 reinforcing the commitment to providing students with challenging academic standards and aligned 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 July 16 to August 16, 2021. Public notice of the waiver, along with a description of GaDOE’s intent to submit the waiver, was posted to the GaDOE website and in the Federal Programs newsletter (see B.1 and B.2 in Appendix B). Emails were sent from GaDOE’s Deputy Superintendent of Assessment and Accountability to LEA superintendents, assessment directors, curriculum directors, Title I directors, and LEA accountability contacts (B.3). Additionally, the notice was sent to members of the State Superintendent’s Parent Advisory Council and parent groups (B.4).

There were 245 respondents to the public survey with an overwhelming majority (242) supporting Georgia’s ESSA waiver request for the middle school assessment exception to apply to eighth grade science students taking high school physical science. Three survey respondents did not support the waiver.

Appendix C includes the comments received during the public comment period.

2.8 Duration and Extension of Waiver – 8401(d)(1) and (2). GaDOE is requesting this waiver be approved for four years, the maximum allowable period for a waiver under ESSA (8401(d)(1)). 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, 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: Evaluating Success of Prior Waiver

Table A.1: Eighth-grade enrollment patterns in high school Physical Science

Enrollment Patterns of 8 th Graders Taking High School Physical Science				
Enrollment	2018	2019	2020	2021
		35,078	37,804	41,621
* 2021 enrollment numbers were likely affected by the Covid-19 pandemic.				

Table A.2: Performance Distributions of Eighth Grade Physical Science

	Year*	Number Tested	Beginning Learner (%)	Developing Learner (%)	Proficient Learner (%)	Distinguished Learner (%)	Proficient and Above (%)
8 th Grade Students Taking the HS Physical Science Exam	2021**	23,203	25.1	22.1	39.0	13.8	52.8
	2019	35,457	14.74	21.55	41.96	21.75	63.71
	2018	32,645	11.23	25.99	42.33	21.45	63.78
* State assessments were canceled for the 2020 school year due to the Covid-19 Pandemic.							
** Participation rates in 2021 were significantly affected by the Covid-19 pandemic, most likely contributing to the changes in student performance in 2021.							

Unanticipated Negative Consequences of Prior Waiver

GaDOE’s Science Program Manager for the state reported no negative feedback from the field over the duration of the prior waiver period. Additionally, feedback from stakeholders across the state (see public comments below) shows that constituents overwhelmingly support the continuation of the waiver.

APPENDIX B: Public Notice

B.1: Public Notice Document

Public Notice of ESSA Waiver for Eighth Grade Science Flexibility

The Georgia Department of Education (GaDOE) 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. A survey with an opportunity for comments is provided at this [link](#) until 11:59 p.m. **August 16**. Questions should be submitted to Allison Timberlake, Deputy Superintendent for Assessment and Accountability, at atimberlake@doe.k12.ga.us.

In an effort to limit the burden of over-testing, states are provided the option under the Every Student Succeeds Act 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, b) their performance on the assessment is used in the year the student takes the assessment to measure academic achievement, and c) in high school the student takes a more advanced high school mathematics assessment. Although Georgia no longer qualifies for the existing exception in eighth-grade math, the State is submitting a waiver request to the U.S. Department of Education for four years (2022-2025 school years), asking that this exception be extended to all eighth-grade students completing the high school physical science course.

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 eighth grade students in high school physical science. The State was granted a similar waiver request in 2018. However, this waiver expired at the end of the 2020-2021 school year and the need for such a waiver remains. In 2021, 23,203 physical science end-of-course tests were taken by eighth-grade students. Without a waiver, these students would not have been covered under ESSA's existing middle school exception and would have had to take the end-of-grade exam. A new waiver allowing the expansion of the ESSA exception to include all eighth-grade students taking high school physical science will further the State's commitment to providing accelerated learning opportunities for all students while eliminating the burden of double testing. Should this waiver be denied, more than 20,000 eighth grade students that take high school physical science across the state of Georgia each year will be expected to take the end-of-grade exam, which is not aligned to standards for the high school course.

In requesting this waiver, the State assures that it meets all three criteria mentioned above (a, b, and c) required for meeting the requested exception for eighth-grade students taking high school physical science.

Prior to submitting this ESSA waiver request, public notice is being provided to education stakeholders across Georgia. GaDOE 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 that GaDOE may receive from stakeholders in response to this notice will be attached to the waiver request sent to the U.S. Department of Education.

B.2: Public Notice Website Location and Newsletter



Richard Woods, Georgia's School Superintendent

Offices & Divisions - Programs & Initiatives - Data & Reporting - Learning & Curriculum - State Board & Policy - Finance & Operations - Contact -

Home → Office of School Improvement → Federal Programs → Title I, Part A

Federal Programs

Title I, Part A

- Academic Achievement Programs
- Allocations
- Committee Of Practitioners
- Community Eligibility Provision (CEP)
- English Learner Programs
- Family-School Partnership Program
- Federal Programs Monitoring
- Other Resources
- Private Schools / Equitable Services
- Professional Qualifications & ESSA In-Field Reporting
- Schoolwide Programs
- Targeted Assistance Programs
- Title I Annual Reports

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

School Grades Reports



Governor's Office of Student Achievement (GOSA)

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.

Contact Information

Ken Banter
Senior Program Manager
Title I, Part A
Phone: 404-463-3467
kbanter@doe.k12.ga.us

Title I, Part A Service Areas List
Title I, Part A Service Areas Map
2021 List of Title I Schools

Federal Programs' Links

- **Public Notice** - ESSA Waiver for Eighth Grade Science Flexibility
- Filing Formal Complaints Under ESSA Programs

Federal Programs

Dear Colleague:

Please review these updates from the Division of Federal Programs.

"Updated" Public Notice of ESSA Waiver for Eighth Grade Science Flexibility

The Georgia Department of Education (GaDOE) 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. A survey with an opportunity

for comments is provided at this [link](#) until 11:59 p.m. August 16. Questions should be submitted to Allison Timberlake, Deputy Superintendent for Assessment and Accountability, at atimberlake@doe.k12.ga.us.



B.3: Public Notice – Email to Superintendents, Assessment Directors, Curriculum Directors, Title I Directors, Accountability Contacts

Public Notice of ESSA Waiver for Eighth Grade Science Flexibility



Allison Timberlake

To ○ K12 Superintendents; ○ K12 Charter School Superintendents

Cc ○ Richard Woods; ○ Matt Jones; ● Paula Swartzberg; ● Sandra Greene; ● Meghan Frick; ○ Lauren Holcomb



You forwarded this message on 7/16/2021 2:11 PM.

This message was sent with High importance.



Public Notice of ESSA Waiver for Eighth Grade Science Flexibility.pdf
.pdf File

Superintendents:

[bcc: Assessment Directors, Curriculum Directors, Title I Directors]

The Georgia Department of Education will be seeking a waiver from the U.S. Department of Education to expand ESSA's eighth-grade advanced mathematics assessment exception. Under this exception, states are provided the option 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, b) their performance on the assessment is used in the year the student takes the assessment to measure academic achievement, and c) in high school the student takes a more advanced high school mathematics assessment. **Although Georgia no longer qualifies for the existing exception in eighth-grade math, GaDOE is submitting a waiver request to the U.S. Department of Education for four years (2022-2025 school years), asking that this exception be extended to all eighth-grade students completing the high school physical science course.**

The approval of this waiver would ensure that eighth-grade students taking high school physical science are able to take the high school physical science assessment instead of the grade 8 science EOG assessment.

Additional details on the waiver request are available in the [waiver public notice](#). The notice is attached to this email and is also available on the [GaDOE's Title I webpage](#). If you have any comments pertaining to this waiver, please submit them via the survey. The survey will be available through August 16, 2021. Questions should be emailed directly to me (atimberlake@doe.k12.ga.us).

Thanks,

Allison

Allison Timberlake, Ph.D.

Deputy Superintendent for Assessment & Accountability

Georgia Department of Education

1562 Twin Towers East

205 Jesse Hill Jr. Drive, SE

Atlanta, GA 30334

(470) 579-3021

atimberlake@doe.k12.ga.us

<http://gadoe.org>

District Accountability Contacts

FW: Public Notice of ESSA Waiver for Eighth Grade Science Flexibility



Paula Swartzberg

To ● Paula Swartzberg

Cc ● Allison Timberlake; ● August Ogletree; ● Jeffrey Harding; ● Kris Dennis; ● Lacey Andrews

You forwarded this message on 7/20/2021 7:40 AM.
This message was sent with High importance.



Accountability contacts:

Please see the email below.

Thank you!

Paula

Paula Swartzberg
Director of Accountability
Assessment & Accountability
1554 Twin Towers East
Georgia Department of Education
205 Jesse Hill Jr. Drive
Atlanta, GA 30334
phone: 470-579-3654
pswartzberg@doe.k12.ga.us
<http://www.gadoe.org>

From: Allison Timberlake <ATimberlake@doe.k12.ga.us>

Sent: Friday, July 16, 2021 2:06 PM

To: K12 Superintendents <superintendents@list.doe.k12.ga.us>; K12 Charter School Superintendents <k12charterschoolsuperintendents@list.doe.k12.ga.us>

Cc: Richard Woods <rwoods@doe.k12.ga.us>; Matt Jones <mattjones@doe.k12.ga.us>; Paula Swartzberg <pswartzberg@doe.k12.ga.us>; Sandra Greene <sgreene@doe.k12.ga.us>; Meghan Frick <mfrick@doe.k12.ga.us>; Lauren Holcomb <lauren.holcomb@scsc.georgia.gov>

Subject: Public Notice of ESSA Waiver for Eighth Grade Science Flexibility

Importance: High

Superintendents:

[bcc: Assessment Directors, Curriculum Directors, Title I Directors]

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Thanks,
Allison
Allison Timberlake, Ph.D.
Deputy Superintendent for Assessment & Accountability
Georgia Department of Education
1562 Twin Towers East
205 Jesse Hill Jr. Drive, SE
Atlanta, GA 30334
(470) 579-3021
atimberlake@doe.k12.ga.us
<http://gadoe.org>

B.4: Public Notice – Family School Partnerships

FW: Family-Friendly Partnership Schools-- Cohort III Announced



Susan Holcomb
To Paula Swartzberg

Reply Reply All Forward ...

Tue 7/27/2021 3:11 PM

You replied to this message on 7/27/2021 3:43 PM.

From: Mandi Griffin <mgriffin@doe.k12.ga.us>
Sent: Tuesday, July 27, 2021 2:29 PM
To: Susan Holcomb <sholcomb@doe.k12.ga.us>
Subject: Family-Friendly Partnership Schools-- Cohort III Announced

Public Notice of ESSA Waiver for Eighth Grade Science Flexibility

The Georgia Department of Education (GaDOE) 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. A survey with an opportunity for comments is provided at this [link](#) until 11:59 p.m. August 16. Questions should be submitted to Allison Timberlake, Deputy Superintendent for Assessment and Accountability, at atimberlake@doe.k12.ga.us.

Questions? View the [Service Area Map](#) to see which Family Engagement Specialist serves your geographic location. If you have questions about budgeting or using Title I, Part A funds for family engagement activities, please coordinate with your Title I Director to contact your GaDOE [Title I Area Specialist](#).

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You are on this email list because you are associated with Georgia's Family-School Partnership Program.

Our mailing address is:
Georgia Department of Education - Family-School Partnership Program
205 Jesse Hill Jr. Drive, SE
Suite 1854
Atlanta, Ga 30334

APPENDIX C: Public Comments

Provide any additional comments in the box below. [Note: Copies of all comments received will be attached to the waiver request sent to U.S. Department of Education.]

Students should be assessed on the standards for the course in which they have received the most recent direct instruction. In this case, the courses for advanced middle school students would be high school algebra and physical science. Absent the elimination of standardized tests, especially for accountability, the best option is the reduction of duplicate testing.

Students demonstrate mastery of the 8th grade science standards by taking the high school EOCT.

Currently 8th graders taking advanced coursework are penalized by being required to take multiple tests.

Too much testing already!

Students need to to take the EOC that assesses the course material they were taught!

Students should be assessed on the content that are being instructed in.

Students are already under a lot of pressure as high stakes assessments determine placement, promotion and sometimes even ranking. If we can reduce the number of final exams for a course to only one that can reduce anxiety and stress.

The 8th Science and high school Physical Science courses have very different standards. It would be a much more accurate and fair assessment to test students on the standards their course taught instead of other standards.

It makes sense, in the best interest of students, for them to take the assessment best aligned to their coursework.

It just makes common sense for students to take the test for the course they just completed. This should be a non-issue.

Based on current GSE, The students haven't enough foundational physical science experiences to be prepared for the rigors in high school. They need that in the middle school.

Students who are advanced learners and taking High School-level courses while still in middle school should not have to be double tested and spend more time out of instruction that is absolutely necessary.

Middle school students who are accelerated taking HS classes should not be penalized and have to take multiple state test for the same subject area.

I teach eight graders who are taking high school physical science. I believe if students can pass the EOC, this shows that they understand and have demonstrated mastery of the 8th grade EOG material as well!

The GA Standards of Excellence for high school physical science are different from eighth grade physical science; they are completely separate courses. Realistically, there is simply not enough time

in a 36-week school year to achieve student mastery of the ten high school physical science standards and their corresponding elements in addition to the five eighth-grade physical science standards and their corresponding elements. Additionally, this would add to the students' testing load in eighth-grade. For our district, many eighth-grade students taking high school physical science are also taking advanced algebra, and are required to take both the eighth-grade math Milestones as well as the high school level Milestone for their advanced mathematics course. An additional Milestones for eighth-grade physical science - a course they are not taking - would result in at least one additional day spent on testing, in addition to the eight days already allotted for eighth-grade Milestones in our district.

Eighth grade physical science standards and high school physical science standards are very different. If we're to focus on "essential standards," that will be near impossible with two full sets of standards to pull from. Students will suffer because class time will be diverted from their actual curriculum to teach to the test over separate standards.

Georgia students should take the assessment that was developed for the course they are taking.

yes but high schoolers are not currently taking the Phys Sci EOC.

Students should be assessed on the content they are taught. 8th grade students taking high school physical science are taught a different curriculum than the one measured on the 8th grade science EOG. Therefore I support the waiver request, and ask that 8th graders taking high school physical science be exempt from the 8th grade EOG and be tested on the physical science EOC test.

Because the standards for physical science are unique, it is unfair to score the students against the 8th grade science standards and expect the students will show what they know and can do accurately.

I strongly support this waiver. Students taking the advanced course of high school physical science in 8th grade should not be subjected to double testing. Further, the 8th grade science EOG does not assess the same standards as in the high school physical science course. Taking a meaningless, unaligned test is a waste of instructional time at best and at worst adds stress to our students who are already suffering from trauma due to the impact of the pandemic.

If students are taking the high school course for physical science then it makes sense for them to take the assessment that is aligned to the correct standards. There are notable differences between the 8th Grade course and the High School course. Students should not have to take an assessment based on standards that were for a different course.

Students should have the opportunity to be assessed on the standards they have learned rather than duplicate testing that does not align to the standards of instruction.

The waiver will allow students to be assessed on the standards they were taught during the year. While there are several topics that overlap between 8th grade science and high school physical science. The standards of each course are different. It does not benefit students to assess them over content they were not taught so I recommend granting the waiver that will allow middle school students in HS physical science to take the physical science EOC.

If the waiver is not granted, middle school teachers and middle schools might be incentivized to teach 8th grade science standards instead of HS Physical Science standards in order to bolster their CCRPI scores.

Middle school student should be provided the opportunity to take advance courses before entering high school. This will reduce the number of HS courses. Additionally with this exposure of early classes, it will increase the the number of dual enrollment students enrolled in college courses which in turn helps the university system's enrollment.

Eighth grade students enrolled in the High School Physical Science course should only be required to take the assessment that corresponds to the course, High School End-of-Course Exam.

The students should not have to take 2 tests over Science. The EOG Science assessment should not align with the high school Physical Science course standards; therefore, it does not make sense for the students to take the 8th Grade EOG Science assessment.

The high school end-of-course test provides a more rigorous assessment of student learning than the middle school end-of-grade test. Requiring students to take both test would place an undue burden on students and reduce their learning time. I strongly support Georgia's waiver request.

Students should take the assessment most tied to the course they complete.

Assessment should inform instruction. If a middle school student is taking a course that requires an EOC it does not make sense to have to take the EOG.

There are overlapping concepts in 8th grade Physical Science and 9th grade Physical Science. The concepts in 9 th grade Physical Science build upon the concepts learned in 8 th grade and ask students to apply their understanding. In other words, 9th Grade Physical Science is designed to be a rigorous progression of content and advancement of science skills that promote a more successful academic transition between middle and high school.

It is unfair for students to take two exams covering similar topics. If students can show mastery of the high school content, they should be exempt from taking the middle school exam.

Students should be assessed over the course they are enrolled in, and should not be expected to take a general science test.

Double testing a student when the standards are more rigorous in the HS class seems excessive. Why do it other than to provide testing companies with more money?

I support this waiver. It makes since that students are taking the assessment in which they are taking the content. Eighth grade science standards are different from Physical Science standards.

The 8th grade standards are different from the HS course standards. It is NOT fair to test students over material that is not addressed in the course.

Please allow students to take just the one exam - the High School exam is more than sufficient to determine mastery of 8th grade Science and High School Physical Science

Eighth grade students taking the EOC should not have to also take the EOG. There is enough overlap in both courses so that if a student can pass the EOC, then they will also be able to pass the EOC. Not only that, but the information in the EOC is at a higher level than the EOG and students who perform on the high school level test should not also have to take a lower level middle school test.

The standards are different for regular 8th grade physical science students. As 8th grade high school students, we already have to scaffold a lot of additional content. These students should not be tested over what we may not have time to teach.

It is important to give the students the option to move ahead when they are ready. Earning high school credits in middle school sets a foundation for them to earn college credits in high school.

Students take too many tests, which in return causes stress and anxiety in our children starting at earlier ages. Children have too many other things to worry about, as do teachers. There are many other ways to assess whether students are meeting milestones and progressing in their academic classes.

Double testing for one content area places an undue burden on students, parents, and teachers.

On behalf of Carrollton City School System, I would like to let you know that we support the ESSA waiver request for middle school assessment exception to apply to 8th grade students that are taking Physical Science for Carnegie Unit Credit. Thank you for your consideration to approve the request for this waiver.

The high school physical science curriculum is very different from the 8th grade science curriculum. There are several elements not covered in the honors course. The time frame that we are allotted to teach the honors standards do not allow for additional standards to be properly taught.

For years my student has been in advanced math for his age and has been taking TWO EOC tests at times. One for his current grade level math (which he took the year or two prior) and one for the upper level math he is in. It is exhausting for these kids to have to go back and forth and constantly be tested on material below their level. While some may say these students should be capable, that doesn't mean they should have to be put through this for challenging themselves.

I think it is important to allow students the opportunity to test based on the end of course exam instead of end of grade. It reduces the anxiety levels and allow students to take ownership of their learning instead of feeling all of the pressure that comes with the end of grade exam.

Students should take the exam associated with the enrolled course.

I think this should perhaps be extended to those in 7th grade that are taking Life Science to be allowed to take the Biology Milestone to receive high school credit for Biology. This may allow students to earn 2 high school science credits (7th Grade Life Science - High School Biology, and 8th Grade Physical Science - High School Physical Science) prior to entering high school and may increase the potential for students to enroll in more rigorous AP science courses during their high school experience.

Testing learners with an assessment not aligned to the topics they covered seems useless. If I go to the doctor with a kidney infection and he decides to test my blood instead of a kidney specimen, how helpful is that? This seems to be the equivalent of what would be happening if students are given the EOG instead of the EOC for their course.

The Honors Physical Science Course is not directly aligned with the 8th Grade Georgia Milestone Assessment. This is not a fair chance for 8th Grade students to be successful.

I teach 8th graders taking high school physical science, and many of them also take Algebra I. Last year, I witnessed the stress of taking two end of year exams for the math students and I do not feel that it is healthy for them to experience that stress in two different classes. Yes, the content is similar, but to truly prepare for two exams of that magnitude to be taken so close together is a mental and emotional strain that is unnecessary. If we truly care about our children, we need to allow the high school EOC to count and NOT take the 8th grade exam.

I have no problem with a single assessment that is given at the end of academic courses at the end of the course/year. Having sound baselines on student learning and being able to figure out where resources need to be appropriated (School/System/State Level) is always helpful. One common assessment per academic area, which will also show a student's academic level in relation to everyone in the state that took the assessment that year will also help them pick out the best fit for their post-secondary options.

Without a waiver, students taking the high school course will have to take the end-of-grade exam, which is not aligned to the standards for the high school course.

It is in the best interest of our eighth-grade students to reduce testing as much as possible. The EOC provides the data needed to determine instructional and accountability needs for this group of students.

The high school course is much more intensive and rigorous than the middle school course. However, there are different standards being covered in each course. Making an 8th grader that is taking a high school course take an exam that is not aligned to their course is a poor choice that punishes the student for choosing a more rigorous class.

The standards for the high school physical science class and the middle school science class are different. Therefore, making the students who take the high school class take the middle school assessment would put them at a disadvantage since there are some standards not covered in the high school class. So, they need to be able to take the end-of-course exam for high school physical science or stop offering the high school physical science class in middle school.

8th grade students are tested in every area. Some 8th grade students are currently required to take 5 different tests as often times those enrolled in HS Physical Science are also enrolled in Algebra 1. If we are truly concerned about limiting the amount of testing that occurs, then the waiver needs to be considered. High achieving students are often intrinsically motivated to perform but it often results in pressure to perform as well which could impact their mental health by creating stress/anxiety.

The standards for the high school physical science course are different than the standards for the 8th grade physical science course. I do not feel it would be fair to our students taking the high school physical science course to test them over standards that they have not been specifically taught.

Students should be allowed to only take the EOC since they are taking a high school course in middle school. They are working harder than their peers and double testing these students is similar to punishing them for trying to accelerate their learning.

Content and pacing are different and they should take the applicable exam.

This would allow the students to be fairly assessed on the standards they are taught and would still meet the Federal requirements of testing in science at each grade band. The standards for the 8th grade physical science course and the high school physical science course are different by design; thus the EOG is designed for the 8th grade course and the EOC for the high school course. Assessment items should align to course standards.

These students should not have to take such a high stakes exam for an area in which they have not been for the year. We test students way too much as it is and this is just an additional burden.

As a teacher of the high school physical science course at the eighth grade level, I have experienced first hand the benefit of students taking the EOC for high school physical science. The students' scores were distinguished and proficient. This is due to the EOC Ga. Milestones test is commensurate with the Georgia Standards of Excellence in high school physical science. As a teacher, we use the GSE as our guide as we progress throughout the year. We teach from the standards using the language of the standards. By the time the students take the Milestones, they are immersed in understanding knowledge of the EOC high school physical science standards. Students who take a Milestones test that have completely different standards, such as the EOG physical science test, the students will be taking a test for 8th grade physical science standards that have not been taught throughout the year. The scores would not reflect the level of mastery that they deserve.

Double testing is too much for a fourteen year olds.

This is important because the students in 8th grade taking high school physical science have different standards than the regular 8th grade EOG. Additionally it is stressful on the students to have to take 2 GMAS tests in science.

Too much testing
Unnecessary

These students are taking the high school course, not the 8th grade. We don't need to over test them

It is not fair to test them on a class they took over a year ago because they are accelerated learners. They took high school courses this year and that is what they should be tested on.

I am taking high school classes. That should be what I am tested on.

8th Grade students are tested more than enough. By approving the waiver request, the State would continue efforts to reduce some of the high-stakes testing placed on students.

Students taking the corresponding high school physical science EOC instead of the eighth grade EOG will give us more authentic and valuable data for our students, parents, and school systems. Ultimately, our students are taking the high school course. It is fair and equitable for them to be assessed on the content and standards they have covered over the year.

This is so obvious that we should not need to even address it. Why would a student take a state exam NOT based on his/her standards when there IS one based on the standards they learn throughout the year? Who should be contacted to bring logic and intelligence to USDOE? I don't mind being the one to make that call.

IF we are teaching the Physical Science Standards then that is the test they need. There is enough difference in the standards because there is material that is assumed to have been taught in 8th grade...for example, Newton's laws of motion and force, mass and acceleration are assumed to have been taught in 8th and those that have Physical Science have never had this and therefore should not be tested on it. There are standards for radiation and radioactivity are not covered in 8th grade, but are in PS and therefore should be tested. There is no sense to test on standards that are not taught and there is no reason to expend a great deal of time to teach things that are never tested.

Tests are so stressful having less will make it so much better

The students shouldn't take a standardized test covering a course they did not take that year- especially when a test exists that DOES cover the material in their course. If they are taking a HS course, they should take the HS exam only.

Why test these students twice especially when the 8th grade science curriculum differs from the high school Physical Science curriculum? Testing these students twice makes no sense.

If students are taking advanced classes, they should not have extra stress added by making them take tests for a lower level grade.

It is not fair to require the honors/advanced students to take multiple tests on physical science. They are being punished for being smart and it is unfair to them.

Failure to provide this waiver will result in some students taking SIX assessments during their 8th grade year - TWO more than the required test in each subject area, due to the fact that 9th grade students taking Algebra 1 already have to take the 8th grade Math EOG as well. This is too much testing. Please approve the waiver - 8th grade students will still be tested in each area, but only once rather than twice in Science.

Students are being punished for their level of intellect when they are required to take two high stakes exams.

Fair for students taking accelerated courses- test items match course standards. Still meets federal requirements of state test. Please approve as assessments should match instruction/standards.

I agree that mandating two different assessments seems superfluous. If a student eligible to be in the high school level course completes this course of study and successfully takes the assessment test correlating to it, that should sufficiently demonstrate capability without the burden of additional testing.

The 9th grade test should be the priority since it is a high school class that goes on their transcript- they should not be expected to do 2 years of work - 8th and 9th in one year.

It is ridiculous to expect these students to test twice. Parents and teachers know that you are using this to raise Georgia's overall testing scores by requiring this only of advanced students. It is unfair and unethical.

I do not understand why we would make them take two high stakes tests. It's seems like punishment for smart kids.