



New Jersey  
Children's Foundation



Hon. Angelica Allen-McMillan, Ed.D.  
Acting Commissioner of Education  
State of New Jersey  
Department of Education  
100 Riverview Plaza  
PO Box 500  
Trenton NJ 08625-0500

August 9, 2022

Dear Acting Commissioner Allen-McMillan:

On July 13, the Department of Education issued guidance for the Fall 2022 administration of the Start Strong assessment for students in grades three through eleven. Our organizations have serious concerns about the relevance and utility of this test for New Jersey's local education agencies (LEAs) as well as the early window of administration.

The Department of Education offered the newly created Start Strong assessment as an option for LEAs in the fall of 2020. The assessment was then administered to all students in late September and early October of 2021. This mandatory testing was done to meet Federal testing requirements following the cancellation of the Spring 2021 New Jersey Student Learning Assessment (NJSLA) due to the COVID pandemic. As the U.S. Department of Education and the NJDOE made clear, the use of a mandatory administration of Start Strong to satisfy federal assessment requirements were limited to the 2020-2021 school year, recognizing that the state was "in the midst of a pandemic that require[d] real flexibility". At the time, educators believed that mandatory administration of the Start Strong test would be a one-time measure. Clearly that is no longer the case, and the decision to add a second, mandatory state assessment now, and possibly in the future, was made without stakeholder input.

We are concerned that this test, while shorter than the NJSLA, will be retesting skills that were assessed by the NJSLA only four months ago. The results from the May NJSLA have not been received yet, making the Start Strong results of limited relevance to educators and parents.

Many LEAs use their own measures to assess and benchmark student skills at the beginning of the school year. We would suggest that instead of mandating a single benchmarking measure,

districts be given the option of using either Start Strong or their own assessment tools, if they believe those tools yield more relevant or timely data. At the very least, LEAs should be able to apply for a waiver from the administration of Start Strong, particularly if they can demonstrate they are implementing an assessment program that provides them with data and information that accomplishes the same goals and benefits as Start Strong.

We also question the timing of the administration window, which begins on August 31, several weeks earlier than the window for the 2021 test. A significant number of LEA's do not even start the new school year until after September 5, making the administration window even shorter for those districts.

The first few weeks of school are foundational for students and educators, setting the stage for the rest of the school year. Interrupting those important weeks for the Start Strong test serves no educational purpose. Should the NJDOE proceed with mandatory administration of Start Strong, which we strongly encourage you to reconsider, extending the testing window by several weeks would provide at least some relief to LEAs.

We are all working for the same goals—promoting student achievement, identifying areas where learning acceleration is needed and ensuring the social/emotional wellbeing of our students. We believe those goals are best served by taking another look at the Start Strong requirement and allowing LEAs more flexible fall assessment options.

Sincerely,

New Jersey Education Association  
Sean Spiller, President

New Jersey Association of School Administrators  
Dr. Richard G. Bozza, Executive Director

New Jersey School Boards Association  
Dr. Timothy Purnell, Executive Director

New Jersey Council of County Vocational-Technical Schools  
Jacqueline Burke, Executive Director

New Jersey Principals and Supervisors Association  
Karen A Bingert, Executive Director

Garden State Coalition of Schools  
Elisabeth Ginsburg, Executive Director

Save Our Schools New Jersey  
Julie Borst, Executive Director

New Jersey Public Charter Schools Association  
Harry Lee, Executive Director

New Jersey Children's Foundation  
Kyle Rosenkrans, Executive Director

cc:

The Honorable Phil Murphy, Governor  
New Jersey State Board of Education  
Senator Vin Gopal  
Assemblywoman Pamela Lampitt