

March 9, 2025

Dear Senator Cwodzinski,

I appreciate the opportunity to share my thoughts on SF2067, which would replace Minnesota's state standards-aligned assessments with the ACT or SAT as the accountability measure for high school students. While I support the state's policy of requiring all students to take a college entrance exam—an approach that removes barriers to and is likely to improve college access (e.g., Klasik, 2012; Swiderski, 2024)—I have significant concerns about using these tests for state accountability purposes.

My primary concerns with this proposal are as follows:

### **Misalignment with State Standards**

The ACT and SAT are not designed to align with Minnesota's academic standards. Prior analyses of these tests in other states have often found that they are poorly aligned (e.g., Christopherson et al., 2020; Roeber et al., 2018); it is very likely that the same would be true in Minnesota. Even if they could be approved through federal peer review, using these tests as accountability measures would send unclear and potentially misleading signals to educators about what and how to teach, undermining the value of the state's standards.

### **Impact on Instruction**

Research, including my own, consistently shows that teachers adjust instruction based on both the content and form of the assessments used for accountability purposes (e.g., Koretz, 2005; Polikoff, 2012). By replacing the state's standards-based assessments with college entrance exams, instruction would likely shift away from state-defined learning priorities and toward the content and structure of the ACT or SAT, which may not reflect Minnesota's specific educational goals.

### **Tests Not Designed for Accountability**

The ACT and SAT were developed as college entrance exams, not as statewide accountability measures. Using a test for a purpose it was not designed for often leads to unintended consequences and reduces the validity of the results for evaluating school and district performance (e.g., Ho & Polikoff, in press; Kane, 1992; Koretz & Hamilton, 2006; Linn & Baker, 2004).

### **Lack of Comparability**

The provision allowing local districts to choose from multiple tests raises serious concerns about comparability. If different schools and districts administer different assessments, it will be increasingly difficult for educators, parents, or state leaders to make meaningful comparisons across the state or track progress over time. If Minnesota moves in this direction, the state should

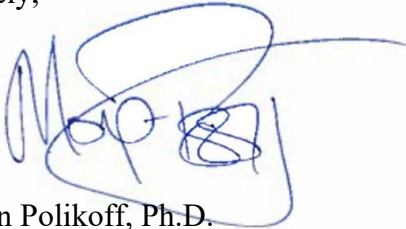
select a single exam to maintain consistency statewide. The state would not allow different schools to select different tests in grades 3-8; why would they allow it in high school?

### **Loss of Longitudinal Data**

Given the disruptions caused by COVID-19, maintaining continuity in assessment data is particularly important. A shift to a new test would make it much more difficult to compare results with pre-pandemic trends, limiting the ability to evaluate long-term academic progress and target recovery to those students most affected.

I appreciate your service and your leadership on education policy in Minnesota. I would be happy to discuss this issue further or provide additional research on the implications of assessment design and accountability.

Sincerely,



Morgan Polikoff, Ph.D.  
Professor, USC Rossier School of Education  
Faculty Director, USC EdPolicy Hub

### **References**

- Christopherson, S. C., Webb, N. L., & Messinger, M. (2020). *Alignment analysis of two forms of the SAT with the Arizona academic standards for English language arts Grades 11–12, Algebra I, and Geometry*. Wisconsin Center for Education Products & Services.
- Ho, A. D., & Polikoff, M. (in press). Assessment for accountability in K-12 education. In L. L. Cook & M. J. Pitoniak (Eds.) *Educational Measurement (5<sup>th</sup> Edition)*.
- Kane, M. T. (1992). An argument-based approach to validity. *Psychological Bulletin*, 112(3), 527.
- Klasik, D. (2012). The college application gauntlet: A systematic analysis of the steps to four-year college enrollment. *Research in Higher Education*, 53, 506-549.
- Koretz, D. (2005). Alignment, high stakes, and the inflation of test scores. *Teachers College Record*, 107(14), 99-118.
- Koretz, D., and Hamilton, L. S. (2006). Testing for accountability in K-12. In R. L. Brennan (Ed.), *Educational measurement (4th ed.)*, 531-578. Westport, CT: American Council on Education/Praeger.
- Linn, R. L., & Baker, E. L. (2004). Validity issues for accountability systems. *Redesigning accountability systems for education*, 47-72.
- Polikoff, M. S. (2012). Instructional alignment under No Child Left Behind. *American Journal of Education*, 118(3), 341-368.

Roeber, E., Olson, J., Topol, B., Webb, N., Christopherson, S., Perie, M., ... & Thurlow, M.  
(2018). *Feasibility of the use of the ACT and SAT in lieu of Florida Statewide Assessments*. Assessment Solutions Group.

Swiderski, T. (2024). Testing the Way Forward: The Impact of Statewide ACT or SAT Testing on Postsecondary Outcomes. *Educational Evaluation and Policy Analysis*.