



MEMO

DATE: February 6, 2025
TO: Assembly Committee on Education
FROM: Chris Reader, Executive Vice President
Quinton Klabon, Senior Research Director
RE: IRG Action Fund Informational Testimony re: AB 1: changes to the educational assessment program and the school and school district accountability report.

Representative Kitchens and committee members, thank you for the opportunity to submit testimony on Assembly Bill (AB) 1, which addresses the critical need to make state test scores and report cards useful again after recent revisions by the Department of Public Instruction (DPI). Thank you to the many cosponsoring legislators for thinking of a way to prioritize consistency and accuracy for parents and schools.

IRG Action Fund is the advocacy and lobbying partner of the Institute for Reforming Government (IRG), a Wisconsin-based think tank that works to give all Wisconsinites an opportunity to prosper. Central to our prosperity is having high-performing schools with high standards and the tools to meet them. State standardized tests and reports cards are essential information for school boards, legislators, and families.

Last month, Wisconsin got back its true test scores. The National Assessment of Educational Progress results ranked Wisconsin 34th in 4th grade reading, 28th in 8th grade reading, 29th in 4th grade mathematics, and 8th in 8th grade mathematics, adjusted for demographics.¹ To make us look even worse, many of the top-performing states were among the lowest spenders in America. The top-10 reading states, for example, were Louisiana, Mississippi, Massachusetts, Indiana, Georgia, Kentucky, Colorado, Texas, South Carolina, and Connecticut. 6 of those 10 are in the bottom 20 in spending per student.²

Unfortunately, our state Forward Exam and ACT benchmarks no longer align with those of the gold-standard Department of Education NAEP. Unlike the state test score standards, the federal standards remained unchanged. Just 31% of 4th graders scored Proficient in reading, far below the 52% claimed by the 2024 Forward Exam.³ This is down from 33% in 2022 and 36% in 2019.⁴ 39% scored Below

¹ Matthew Chingos, "[States' Demographically Adjusted Performance on the 2024 National Assessment of Educational Progress](#)," Urban Institute, January 29, 2025.

² National Center for Education Statistics, "[Total Expenditures for Public Elementary and Secondary Education and Other Related Programs, by Function and State or Jurisdiction: School Year 2020-21](#)," August 8, 2023.

³ United States Department of Education, "[State Profiles: Overview & Trends](#)," January 29, 2025

⁴ Wisconsin Department of Public Instruction, "[WISEdash Data Files by Topic: Forward](#)," October 8, 2024.

Basic. In mathematics, 42% of 4th graders scored Proficient, not 54%, as the Forward Exam claimed. Having an unreliable test is terrible news for educators, parents, and elected officials.

IRG's report, *Testing Our Patience*, broke the news on how, when, and why Superintendent Jill Underly lowered 2024 Forward Exam and ACT standards. We will share key insights from that report here, drawing on public records through April 2024. IRG has waited months for DPI to provide a second round of public records on the matter for its follow-up report.

To help you understand why these changes are bad, we will advance 3 main points. First, DPI's public justification for changing standards does not match what they said behind closed doors. Second, DPI's new Forward and ACT proficiency rates are not useful to parents. Third, DPI's changes hurt the consistency of state report cards.

Superintendent Underly has argued test standards needed to be lowered due to changes in the test. DPI updated reading and mathematics standards this decade, and they also modified the Forward Exam with new components.⁵ To quote the Superintendent, "This meant the Forward Exam needed to be updated to accurately assess students on those learning goals, and that a standard setting was required to take place."⁶

This does not appear to be how changes originated. On January 23, 2023, then-Executive Director Tom McCarthy wrote, "Dr. Underly is interested in taking another look at how we establish our cut scores for the Forward Exam. Given that we're amid some other change in that area, we're asking for a decision paper on what it would take to change the cut scores, as well as what timeline we'd be working off."⁷ In other words, Superintendent Underly's desire to change cut scores came before she was aware of any standard setting. In February and March 2024, she added, "Before I jumped off- yes, I'd like to have a conversation about our cut scores being the highest in the country and how we communicate what that translates to with NAEP," and, "I also want to, and maybe this exists as a possibility, to norm our levels to be similar to other states... as I hear that we have some of the highest cut scores nationally. I would like them to be looked at so that we aren't judged negatively when we have direct standards."⁸ These quotations came months before teachers show up to set cut scores, yet Superintendent Underly specifically indicates that she would like to lower standards to match Wisconsin's scores to those of Midwestern states surrounding us.

Additionally, it is simply not true that holding a fresh standard setting or revised test format required drastic changes in the grading scale. In June and July, educators and DPI had full autonomy to set the

⁵ Wisconsin Department of Public Instruction, "[Wisconsin Forward Exam Updates](#)," July 17, 2024.

⁶ Jill Underly, "[New Proficiency Levels Reflect Wisconsin Student Performance](#)," The Capital Times, October 10, 2024.

⁷ Jake Curtis, "[Testing Our Patience: How Wisconsin Lowered Standards, Widened the Achievement Gap, and Busted Its State Exams](#)," Institute for Reforming Government, October 5, 2024.

⁸ Jake Curtis, "[Testing Our Patience: How Wisconsin Lowered Standards, Widened the Achievement Gap, and Busted Its State Exams](#)," Institute for Reforming Government, October 5, 2024.

cutoff standards wherever they preferred, making it possible to compare 2024 to earlier years.⁹ The Long-Term-Trend NAEP itself has provided unbroken trend lines since 1971 despite vast changes in American education and a test format revision in 2004.¹⁰

Superintendent Underly has also argued that NAEP is too difficult a grader and the Forward Exam and ACT now properly measure grade-level achievement. She recently said, “[NAEP’s] actually a grade level above where kids are, so we were measuring kids on their current Forward exam at a different standard than grade expectation for the kids.”¹¹

There are a few problems with this. First, it is not clear that Superintendent Underly came into this work with the necessary understanding to do the best job. In June and July 2023, when setting standards for the PreACT they would lower a year later, she wrote, “I need help with this. I obviously trust Viji [Somasundaram], but I truly don’t understand what I am looking at for my approval. And with all this other nonsense going on with literacy I want to make sure we’re not throwing more fuel onto this fire. The crummy thing is, I am an educator and I don’t understand it - so how are parents supposed to understand this too? If we could set the standards and the cut scores, but then have some kind of way to interpret it to parents and educators as a companion, that would be great. For example, what does Proficient mean vs. Advanced? That they are at grade level vs. the next grade level? I just hate this stuff so much.” Later, she responded, “I’m going to need a primer on this, or a tutoring session. I still don’t understand it, and it’s just a learning block that I have on my end.” Aside from a possible shot at Act 20 reading reforms, it also appears she was unsure of how to define proficiency.

Second, it is the 2023 benchmarks that clearly labeled student learning and the 2024 benchmarks that mislabeled them. NAEP and 2023 Forward benchmarks used to be simple. Minimal was roughly “below grade level,” Basic was “grade level,” Proficient was “college- and career-ready,” and Advanced was “selective college- or career-ready.”¹² Instead of simply relabeling them as such, DPI changed the cut scores to new benchmarks that no longer represent grade level. For example, the Lake Country School District has among the highest proficiency rates in Wisconsin. But 22.3% of Lake Country 4th graders still scored Developing or Approaching on the 2024 Forward Exam and are supposedly below grade level, according to Superintendent Underly. Does anybody on this committee actually think 1 in 5 Lake Country 9-year-olds cannot read grade-level books like *Charlie and the Chocolate Factory* or *The Wind in the Willows*? But do not take my word for it. Her own staff at DPI appeared to contradict her. Deputy State Superintendent Tom McCarthy and Policy Initiatives Advisor John Johnson told the *Milwaukee Journal*

⁹ Jake Curtis, [“Testing Our Patience: How Wisconsin Lowered Standards, Widened the Achievement Gap, and Busted Its State Exams,”](#) Institute for Reforming Government, October 5, 2024.

¹⁰ United States Department of Education, [“NAEP Long-Term Trend Assessment Results: Reading and Mathematics,”](#) March 5, 2024.

¹¹ Kelly Meyerhofer, [“Wisconsin State Superintendent Voter Guide for Spring 2025 Primary: What 3 Candidates Say about ICE, School Police, Referendums and More,”](#) *Milwaukee Journal Sentinel*, February 5, 2025.

¹² United States Department of Education, [“Scale Scores and NAEP Achievement Levels,”](#) December 9, 2021.

Sentinel “‘Grade level’ probably falls between ‘meeting’ and ‘approaching.’”¹³ Whether you want rigorous or less rigorous standards, parents need information about their children that clearly communicates how their children are doing. The new Forward Exam standards do not provide that.

Third, the federal government clearly declares what “proficiency” means. Under the federal Every Student Succeeds Act, “Students in America [are to] be taught to high academic standards that will prepare them to succeed in college and careers.”¹⁴ DPI, on the other hand, has lowered the proficiency standard on the ACT from about a 21 to a 19.¹⁵ ACT itself says students who score a 19 will not likely succeed in college.¹⁶

Finally, Superintendent Underly’s change will disrupt state report cards yet again, hurting the consistency for parents and school leaders. “The DPI will convene a group of educators [in 2025] to help align the report card cut scores to communicate the success of schools and districts.”¹⁷ This would be the third time in 5 years that DPI changes the report cards.

This is because Achievement scores are now through the roof while Growth scores stay the same. In other words, districts with few low-income students would have a much greater advantage than districts with many low-income students on state report cards. Unfortunately, DPI staff warned leadership of this happening. “These report card rating increases will benefit low-poverty schools more than high-poverty schools due to variable weighting of Achievement and Growth priority areas, as required by state law,” said the Office of Educational Accountability on April 3, 2024.¹⁸ Indeed, that is what happened. From 2023 to 2024, White-Black achievement gaps in reading grew 4.7% in Madison and 7.9% in Racine. White-Hispanic gaps grew 1.9% in Eau Claire and 4.1% in Sheboygan.¹⁹ Mathematics is even worse. As a result, unless DPI revises state report cards, their internal emails suggest the amount of 4- and 5-star districts will rise to 50% in 2025 and 71% in 2026.²⁰ What parents, school boards, and educators want from report cards is consistency from year to year, especially as children recover from the pandemic. Superintendent Underly’s lowering of test score standards makes consistency impossible going forward.

In sum, Superintendent Underly wanted to lower standards years ago, her new standards do not communicate grade-level- or college-readiness to parents, and her revisions require yet another revision to state report cards. The changes are bad for families, policymakers, and educators. Superintendent

¹³ Alan Borsuk, “[Does Lowering Cut Scores and Changing Terminology on Standardized Tests Better Serve Wisconsin Students?](#)” *Milwaukee Journal Sentinel*, August 23, 2024.

¹⁴ United States Department of Education, “[Every Student Succeeds Act \(ESSA\)](#),” January 14, 2025

¹⁵ Wisconsin Department of Public Instruction, “[The ACT Data and Results](#),” October 1, 2025.

¹⁶ American College Testing, “[ACT Scores for Higher Education Professionals](#),” March 1, 2023.

¹⁷ A.J. Bayatpour, “[New State Report Cards Released: Scoring Change Complicates Yearly Comparisons](#),” *WDJT*, November 19, 2024.

¹⁸ Jake Curtis, “[Testing Our Patience: How Wisconsin Lowered Standards, Widened the Achievement Gap, and Busted Its State Exams](#),” Institute for Reforming Government, October 5, 2024.

¹⁹ Wisconsin Department of Public Instruction, “[WISEdash Data Files by Topic: Forward](#),” October 8, 2024.

²⁰ Jake Curtis, “[Testing Our Patience: How Wisconsin Lowered Standards, Widened the Achievement Gap, and Busted Its State Exams](#),” Institute for Reforming Government, October 5, 2024.

Underly has said the debate over test-score standards is a distraction from underfunding Wisconsin district schools, adding, "If it wasn't a political year, this is my feeling, it wouldn't be an issue."²¹ The school boards, education advocates, and parents in uproar over these confusing changes demonstrate it is the opposite: chasing high standards is what is best for kids every year.

AB 1 will return standards to rigorous benchmarks that all parents want for their children. We thank the committee for hearing this bill today.

²¹ Jill Underly, "[February 4, 2025](#)," *UpNorthNews Radio*, February 4, 2025.