January 8, 2020

EQAO (Education Quality and Accountability Office)
Suite 1200
2 Carlton Street
Toronto ON
M5B 2M9

Dear Chair Montgomery & the EQAO Board of Directors,

RE: Grade 10 Literacy Test Concerns

The Waterloo Region District School Board's Special Education Advisory Committee (SEAC) has received feedback from our member associations that we felt was important to share with you. EQAO testing is optional in earlier grades providing students with exceptionalities with a choice not to write it. This is not the case for the Grade 10 EQAO Literacy Test. Accommodations for students who have Individualized Education Plans (IEPs) do not always meet their needs when writing the Grade 10 EQAO Literacy Test and therefore it does not accurately measure their literacy abilities.

Many students who are required to complete the literacy test are capable of this work, however, other factors are not taken into account such as, mental health and communication limitations. Success on the EQAO Literacy Test can be greatly influenced by a student's anxiety, attention/focus difficulties, time management, test phobia, as well as the efficiency of communication devices for those students who require this accommodation or use eye gaze for communication.

Those students with anxiety, ADHD, communication limitations or other diagnoses on an Individualized Education Plan, are currently given extra time to complete the test. Although this may be helpful and appropriate for some students, it is not helpful for all. Anxiety that students encounter doesn't go away because extra time is allotted. Students with ADHD, for example, don't have better focus because they have more time to complete a test. In fact, with the Grade 10 EQAO Literacy Test students who struggle to focus are required to focus on a single task for an even longer period of time (potentially up to 6 hours). As a result this test is no longer a measure of literacy for the student with anxiety or ADHD, but rather the student's mental health and ability to attend to the task. For the student with communication challenges, we end up with a measure that is influenced by the speed of communication rather than a pure literacy measure.









SEAC provides the following recommendations for your consideration:

- 1. Remove the test as a requirement for graduation. Standardized testing is not in alignment with the current testing philosophy and pedagogy.
- 2. Students can demonstrate literacy through current coursework as an alternative (There should be another way that students can provide evidence of literacy proficiency through their current course work)..
- 3. Exempt students from literacy test when mental health is of concern, based on doctor or counsellor recommendation.
- 4. Allow completion of one booklet of testing per day, as there are two booklets. This would allow those students who receive extra time to limit the test to 3 hours in one day, instead of 6 hours.
- 5. Allow a student with communication limitations the necessary time to complete the test, based on a therapist or school resource teacher recommendation.
- 6. Allow teacher interaction and assistance, as outlined by the student's IEP, to ensure that the test result is a true measure of literacy and not mental health or communication limitations.

The Waterloo Regional District School Board makes many necessary accommodations and modifications for students to be successful in school. These same supports are not always able to be provided for the Grade 10 EQAO Literacy Test and as a result the measure of literacy proficiency is not accurate, as so many other factors get in the way of truly understanding our students' capabilities. This is fundamental to student confidence, mental health and fundamentally, their ability to graduate. We would be happy to discuss our recommendations with you further as the success of our students are in your hands.

Yours truly,

Jayne Herring

WRDSB Chairperson of the Board

Janine Oosterveld WRDSB SEAC Chair