



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

DEC 30 2019

The Honorable Christina Kishimoto
Superintendent
Hawaii State Department of Education
1390 Miller Street
Honolulu, HI 96813

Dear Superintendent Kishimoto:

I am writing in response to the Hawaii Department of Education's (HIDOE) request on October 1, 2019, for an extension of the State's waiver of section 1111(b)(2)(D)(i)(I) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA), of the requirement that a State may not assess using an alternate assessment aligned with alternate academic achievement standards (AA-AAAS) more than 1.0 percent of the total number of students in the State. HIDOE requested this waiver because, based on State data for the 2018-19 school year, the HIDOE has concluded that it will need to assess more than 1.0 percent of students using an AA-AAAS in the 2019-2020 school year in reading/language arts, mathematics and science.

After reviewing HIDOE's request, I am granting, pursuant to my authority under section 8401 of the ESEA, for the 2019-20 school year, a one-year extension of the State's waiver of section 1111(b)(2)(D)(i)(I) of the ESEA so that the State may assess with an AA-AAAS more than 1.0 percent of the total number of students in the State who are assessed in mathematics and reading/language arts.

As part of this waiver, HIDOE assured that it:

- Will continue to meet all other requirements of section 1111 of the ESEA and implementing regulations with respect to all State-determined academic standards and assessments, including reporting student achievement and school performance, disaggregated by subgroups, to parents and the public.
- Assessed in the prior school year (2018-2019) at least 95 percent of all students and 95 percent of students with disabilities who are enrolled in grades for which reading/language arts and mathematics assessments are required.
- Will require that a complex area submit information justifying the need of the complex area to assess more than 1.0 percent of its assessed students in any such subject with an AA-AAAS.
- Will provide appropriate oversight of a complex area that is required to submit such information to the State, and it will make such information publicly available.
- Will verify that each complex area that is required to submit such information to the State is following all State guidelines in 34 CFR 200.6(d) (with the exception of incorporating principles of universal design) and will address any subgroup disproportionality in the percentage of students taking an AA-AAAS.
- Will implement, consistent with the plan submitted in HIDOE's waiver request, the system improvements and monitor future administrations to avoid exceeding the 1.0 percent cap.

I note that the State demonstrated progress both in carrying out the plan you submitted when HIDOE originally requested this waiver and in reducing the rate of participation in the AA-AAAS. I also want to remind you of the requirement in 34 CFR 200.6(c)(3)(iv) that the State must make publicly available the information submitted by a local educational agency (LEA) justifying the need of the LEA to assess more than 1.0 percent of its students on the AA-AAAS, provided that such information does not reveal personally identifiable

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information about an individual student. I also encourage you to make available your State's plan and timeline and your progress to date in reducing the percentage of students taking the AA-AAAS.

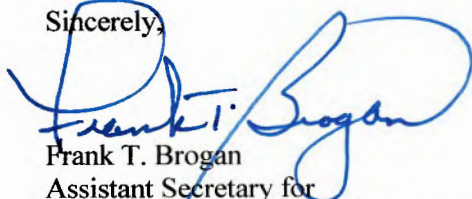
I am denying HIDOE's request for a waiver of section 1111(b)(2)(D)(i)(I) of the ESEA to assess with an AA-AAAS more than 1.0 percent of the total number of students in the State who are assessed in science. My reason for denial of the request is that, based on the data submitted for school year 2018-2019, HIDOE did not meet the requirement in 34 CFR 200.6(c)(4) that, in order to be eligible for such a waiver, the State must assess at least 95 percent of all students and 95 percent of children with disabilities on the science assessments. In 2018-2019, HIDOE assessed less than 95 percent of children with disabilities on the science assessment. I note, however, that based on preliminary data submitted to ED*Facts*, in 2018-2019 HIDOE appears to have assessed slightly less than 1.0 percent of tested students in science with an alternate assessment. The Department is encouraged by this progress from the previous school year. If this progress is maintained in the 2019-20 school year, it appears a waiver may not be necessary for science.

If the data HIDOE previously reported are erroneous and HIDOE can demonstrate that it assessed at least 95 percent of all students and 95 percent of students with disabilities on the science assessments, HIDOE may revise its waiver request, consistent with section 8401(b)(4)(B)(ii) of the ESEA, to meet the requirements under sections 8401(b)(1)(C) and (F) and resubmit the revised waiver request to address how it has met the requirements in 34 CFR 200.6(c)(4), including the requirement in 34 CFR 200.6(c)(4)(ii)(B) that the State has measured the achievement of at least 95 percent of all students and 95 percent of students in the children with disabilities subgroup under section 1111(c)(2)(C) of the ESEA who are enrolled in grades for which the State is required to administer statewide assessments. If HIDOE decides to resubmit, it must do so no later than 60 days from the date of this letter.

Finally, in order to help all States support implementation of the 1.0 percent participation threshold for AA-AAAS participation, the Department is supporting work by the National Center on Educational Outcomes (NCEO). I note that Hawaii has participated in some of these efforts and encourage your State's continued involvement. In 2019, NCEO published several resources that may be helpful to stakeholders in your State. They may be found online at https://nceo.info/Assessments/alternate_assessments.

I appreciate the work you are doing to improve your schools and provide a high-quality education for your students. If you have any questions, please contact my staff at ESEA.Assessment@ed.gov.

Sincerely,



Frank T. Brogan
Assistant Secretary for
Elementary and Secondary Education

cc: Teri Ushijima, Director of Assessment and Accountability
Brian Reiter, Manager of Assessment

ESEA §1111(b)(2)(D) and 34 CFR 200.6(c) and (d)

SY 2019-20 Hawaii One Percent Threshold Plan and Waiver Extension Request

HAWAII STATE DEPARTMENT OF EDUCATION
ASSESSMENT SECTION/ HAWAII STATE ASSESSMENT - ALTERNATE

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INTRODUCTION

Title I of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act of 2015 (ESSA) [ESEA §1111(b)(2)(D) and 34 CFR 200.6(c) and (d)], modifies the provision that students with the most significant cognitive disabilities may participate in alternate assessments based on alternate academic achievement standards (alternate assessments). ESSA places a 1.0% threshold on the number of students who may participate in alternate assessments. States that anticipate exceeding the 1.0% threshold must submit a waiver request to the U.S. Department of Education.

The Hawaii State Department of Education (HIDOE) alternate assessment based on alternate achievement standards is called the Hawaii State Assessment - Alternate (HSA-Alt). HSA-Alt participation rates for School Year (SY) 2018-19 were 1.0% for English Language Arts (ELA), 1.0% for Mathematics, and 1.3% for Science. Based on these data, the HIDOE does not anticipate exceeding the 1.0% threshold for the SY 2019-20 HSA-Alt administration in ELA and Mathematics, however does have concerns about meeting this threshold for the content area of Science. The State has struggled to meet the 95% participation rate requirement for the testing of disabled students in Science. This concern is addressed in the updated version of the *SY 2019-20 Hawaii One Percent Threshold Plan and Waiver Extension Request*.

The original HIDOE waiver of §1111(b)(2)(D)(i)(I) of the ESEA that allowed the State to assess more than 1.0% of the total number of students in ELA and Mathematics on the HSA-Alt was submitted in November 2017 and approved by the United States Department of Education. HSA-Alt participation rates for SY2016-17 were 1.04% for ELA, 1.05% for Mathematics, and 0.97% for Science. In SY 2017-18, HSA-Alt participation rates were 1.10% for ELA, 1.09% Mathematics, and 1.11% for Science. In SY 2018-19, HSA-Alt participation rates were 1.0% for ELA, 1.0% Mathematics, and 1.3% for Science. The data for the content areas of ELA and Mathematics show substantial improvement, however, as stated earlier participation rates for Science testing of disabled students and alternate students are not meeting federal expectations.

Based on SY 2018-19 data and an analysis of current state policies, HIDOE anticipates meeting the 1.0% threshold again for the SY 2019-20 HSA-Alt administration in ELA and Mathematics. The State anticipates that the content area of Science will be a continuing area of concern. As such, the State is meeting US DOE requests for information under the provisions of their 2018-19 Waiver Plan Extension by submitting an updated version of this Plan. The *SY 2019-20 Hawaii One Percent Threshold Plan and Waiver Extension Request* continues all components of the *SY 2018-19 Hawaii One Percent Threshold Plan and Waiver Extension Request* and includes measures to address disabled student participation rates, particularly in the content area of Science.

The SY 2019-20 Hawaii One Percent Threshold Plan is being implemented in an effort to increase student with disabilities test participation rates in all subject areas with a special emphasis on Science, to ensure that the HIDOE meets federal thresholds for disabled student and alternate test participation in all content areas, and to further reduce levels of alternate identification in the State so that only students with the most significant cognitive disabilities are identified.

What follows is HIDOE's evidence of meeting the US DOE provisions of the SY 2018-19 Hawaii One Percent Threshold Plan, SY 2019-20 alternate test participation rates for each of the three content areas, ELA, Mathematics, and Science, and Hawaii's one percent threshold plan and timeline for school year 2019-20.

Multiple electronic resources are referenced as evidence of activities and requirements, and are accessible online. Web links to these resources are embedded in the text of this document, allowing the reader to link directly to content-specific support documents in context.

[34 CFR §200.6\(c\)\(4\)\(i\): Substantial Progress](#)

The fact that Hawaii has reduced its alternate test participation rate to the 1% threshold in the content areas of ELA and Mathematics supports Hawaii's claim that the State has made substantial progress. For the identified areas of concern, lower percentages of disabled students taking a summative test in the content area of Science and higher percentages of students taking the alternate form of the Science summative assessment, the State has not made progress. In SY 2017-18 disabled student participation rate for the content area of Science was 93.9%. In SY 2018-19, disabled student participation rate for the content area of Science was 92.9%. In SY 2017-18, alternate test participation rate for the content area of Science was 1.1%. In SY 2018-19, alternate test participation rate for the content area of Science was 1.3%. This data and these concerns are connected; as the number of disabled students participating in the State summative test in Science has decreased, the denominator for the alternate test participation rate calculation has been impacted and caused the percentage of students who take the alternate form of the State summative test in Science to rise. This situation is an area of concern and the State has focused attention on this issue within the updated version of the One Percent Threshold Plan.

[34 CFR §200.6\(c\)\(4\)\(ii\): State-Level Data](#)

A. State-Level Data of HSA-Alt Participation Rate for the 2018-19 Academic Year

[Table 1](#), [Table 2](#), and [Table 3](#) provide HIDOE's SY 2018-19 state-level data for the number and percentage of students in each subgroup who participated in the HSA-Alt in ELA, Mathematics, and Science, respectively.

Table 1: HSA-Alt Sub-Group Counts and Participation Rates for ELA in SY 2018-19

Student Sub-Group	# Students Participating in General Assessment	# Students Participating in HSA-Alt	Total # Students Assessed	Percentage Participating HSA-Alt
All Students	92219	965	93184	1.0%
American Indian or Alaska Native				
Asian	25656	253	25909	1.0%
Native Hawaiian or Other Pacific Islander	25146	320	25466	1.3%
Black or African American	1515	14	1529	0.9%
Hispanic or Latino	14484	157	14641	1.1%
White	10794	99	10893	0.9%
Two or More Races	14443	120	14563	0.8%
English Language Learner (ELL)	7074	178	7252	2.5%
Economically Disadvantaged students	44819	567	45386	1.2%
Migratory Students				
Male	47586	656	48242	1.4%
Female	44633	309	44942	0.7%

Table 2: HSA-Alt Sub-Group Counts and Participation Rates for Mathematics in SY 2018-19

Student Sub-Group	# Students Participating in General Assessment	# Students Participating in HSA-Alt	Total # Students Assessed	Percentage Participating in HSA-Alt
All Students	93163	963	94126	1.0%
American Indian or Alaska Native				
Asian	26160	254	26414	1.0%

Student Sub-Group	# Students Participating in General Assessment	# Students Participating in HSA-Alt	Total # Students Assessed	Percentage Participating in HSA-Alt
Native Hawaiian or Other Pacific Islander	25416	322	25738	1.3%
Black or African American	1526	12	1538	0.8%
Hispanic or Latino	14571	154	14725	1.0%
White	10817	97	10914	0.9%
Two or More Races	14491	122	14613	0.8%
English Language Learner (ELL)	7854	180	8034	2.2%
Economically Disadvantaged students	45410	560	45970	1.2%
Migratory Students	1270	11	1281	0.9%
Male	48078	653	48731	1.3%
Female	45085	310	45395	0.7%

Table 3: HSA-Alt Sub-Group Counts and Participation Rates for Science in SY 2018-19

Student Sub-Group	# Students Participating in General Assessment	# Students Participating in HSA-Alt	Total # Students Assessed	Percent Participating in HSA-Alt
All Students	36993	491	37484	1.3%
American Indian or Alaska Native				
Asian	11854	147	12001	1.2%
Native Hawaiian or Other Pacific Islander	11007	159	11166	1.4%
Black or African American	646	13	659	2.0%
Hispanic or Latino	4502	68	4570	1.5%

Student Sub-Group	# Students Participating in General Assessment	# Students Participating in HSA-Alt	Total # Students Assessed	Percent Participating in HSA-Alt
White	4564	56	4620	1.2%
Two or more races	4325	47	4372	1.1%
English Language Learner (ELL)	2964	78	3042	2.6%
Economically Disadvantaged students	17131	257	17388	1.5%
Migratory Students				
Male	19247	306	19553	1.6%
Female	17746	185	17931	1.0%

Table 4: Comparison of Science HSA-Alt Participation Rates – SY 2016-17, SY 2017-18, and SY 2018-19

Student Sub-Group	Percentage Participating in HSA-ALT			Percentage Point Change over previous year	
	SY 2016-2017	SY 2017-2018	SY 2018-2019	SY 2017-2018	SY 2018-2019
All Students	0.97%	1.11%	1.31%	0.14%	0.20%
American Indian or Alaska Native	0.86%	0.00%	1.04%	-0.86%	1.04%
Asian	0.89%	0.89%	1.22%	0.00%	0.33%
Native Hawaiian or Other Pacific Islander	1.23%	1.37%	1.42%	0.14%	0.05%
Black or African American	1.06%	1.99%	1.97%	0.93%	-0.02%
Hispanic or Latino	0.96%	1.12%	1.49%	0.16%	0.37%
White	0.85%	0.92%	1.21%	0.07%	0.29%
Two or more races	0.73%	1.08%	1.08%	0.35%	0.00%
English Language Learner (ELL)	1.90%	1.87%	2.56%	0.13%	0.69%
Economically Disadvantaged students	1.19%	1.30%	1.48%	0.11%	0.18%
Migratory Students	1.66%	1.37%	0.00%	-0.29%	-1.37%
Male	1.24%	1.40%	1.56%	0.16%	0.16%
Female	0.69%	0.79%	1.03%	0.10%	0.24%

B. State Measured Achievement of at Least 95% of Students

Hawaii met the 95% participation requirement for all students and for students with disabilities in two of the three content areas. ELA and Mathematics test participation for the disabled student subgroup met the 95% benchmark, however, in the content area of Science, the State fell short of this goal with 92.9% of the disabled student subgroup participating in Science testing in SY 2018-19. This information can be found in Table 5.

Table 5: SY 2018-19 Participation Rate of All Students and Students with Disabilities

Content Area	Students Enrolled	Students Assessed	Percentage Assessed	Students with Disabilities Enrolled	Students with Disabilities Assessed	Percentage of Students with Disabilities Assessed
Reading	95787	93948	98.0%	9986	9503	95.1%
Mathematics	95786	94126	98.2%	9986	9532	95.4%
Science	38537	37340	96.8%	4108	3719	92.9%

34 CFR §200.6(c)(4)(iii): Assurances

A. State Assurance that LEAs Followed State HSA-Alt Participation Guidelines

The Hawaii State Department of Education is a single SEA/LEA. Going beyond the federal requirements, the State continued to work at the school level in SY 2018-19 requiring all schools with a testing population greater than 180 students to submit Assurances to the State that the HSA-Alt Participation Guidelines were being used as a basis for alternate student identification if the school’s rate of alternate student identification exceeded 1%. Schools with rates of identification between two and three percent were also required to submit written justification for identification overage. The Assessment Section announced the availability upon request of SY 2018-19 School Assurance and Justification forms in the August 12 edition of the Assessment News. See [August 12, 2019 Assessment News, page 3](#). (The Assessment News is an electronic update sent out weekly to all School Testing Coordinators. This weekly update is also posted on HIDOE’s Assessment Program website, alohahsap.org.)

In SY 2018-19 the State included additional oversight measures for schools with identification rates in excess of 3%. The specific measures for schools with rates of identification above 3% included in-person site visits and staff training on alternate student identification criteria and the sharing of IEP file review results for all alternate-identified students at the school. HSA-Alt student test session observations were also conducted at select sites in 2018-19.

The SY 2019-20 One Percent Threshold Plan will continue to require schools with rates of identification above 1% to submit assurance that the HSA-Alt Participation Guidelines are being used by IEP teams at the school as the basis for alternate student identification. An updated assurance form will be used, see *Appendix- 1% Percent Threshold Assurance and Justification Form*. The new form requires all schools with overages of 1% or more to also provide justification. In addition, the form requires that schools calculate disabled student test participation rates for each content area, thereby calling attention to, the critical need to increase test participation for the disabled student group across

content area tests. SY 2019-20 Assurance and Justification form availability will again be announced on the Hawaii State Assessment Program website portal at the conclusion of the testing window.

The action plan also calls for additional oversight measures for first-year schools with rates of identification greater than 3%. These measures are mandatory and may include: site visits, staff training, alternate student test session observations, and alternate student IEP file review. For second-year schools with rates of identification greater than 3%, the State's Plan calls for Complex Area Superintendent oversight, conferencing, and complex area submission of justification. These additional measures are being undertaken in an effort to curb continuing high rates of alternate student identification at these schools.

B. State Assurance that LEAs will Address Disproportionality of Subgroups

The HIDOE uses a simple formula for calculating disproportionality based upon comparing the prevalence of the sub-group within the population of students identified for the HSA-Alt to the prevalence of the sub-group within the total population. Sub-group percentage in the Alternate population: sub-group percentage in the total test population. Ratios above a factor of two will be considered as "targets" in Hawaii's *One Percent Threshold Plan*.

Below is a list of subgroups that are included in the ratio analysis.

1. Racial/Ethnic Groups
 - a. American Indian or Alaska Native
 - b. Asian
 - c. Pacific Islander or Other Pacific Islander
 - d. Black or African American
 - e. Hispanic or Latino
 - f. White (not Hispanic)
 - g. Two or more races (Multiracial not Hispanic)
2. English Language Learner (ELL)
3. Socio-Economic Status (as determined by Free and Reduced Price Lunch Status)
4. Migratory Students
5. Gender
 - a. Male
 - b. Female

The ELL sub-group disproportionality that has existed in the State continues to exist and is being addressed through the continued sharing of information and ongoing development of alternate identification resource materials. Educator training and outreach are used extensively to bring pertinent information and resources to teachers in the field. Summative test and alternate test, overall

and sub-group participation data are shared. ELL identification and Science content area testing are raised as red flags.

New resources and Hawaii State Assessment Program measures include the *Factors and Red Flags on the Road to HSA-Alt Student Identification*, the updated *HSA-Alt Participation Guidelines*, and the addition of an ELL status question to the Learner Characteristics Inventory. In addition, a new HSA-Alt IEP Rubric is used that includes ELL subgroup identification and WIDA ACCESS 2.0 Listening Comprehension score consideration. This IEP rubric is used during alternate-identified student IEP evaluations at schools with rates of identification over 2%.

Federal guidelines on testing that require the testing of at least 95% of all students and 95% of disabled students, State data showing overall and subgroup test participation rates for the general and alternate forms of the summative assessment, alternate student identification resources, information on the designated supports available for the general assessment, and designated support documentation requirements for IDEA, 504, and ELL students are shared in multiple Assessment Section training sessions across the State. 2019-20 Assessment Section training sessions include: Accessibility and Accommodations, Smarter Balanced Test Administrator, WIDA ACCESS 2.0, 1% Webinar, and HSA-Alt Test Administrator training.

[34 CFR §200.6\(c\)\(4\)\(iv\): State Plan and Timeline](#)

The State Plan includes descriptions of the school support and oversight model, the theorized mechanisms of support, the universal support activities, the tiered model for intervention, and the proposed timeline for implementation.

A. School Support and Oversight Model

Hawaii's plan for school support and oversight is grounded in providing information and data to all schools, not just schools that exceed the 1.0% threshold. Hawaii's plan is intentionally designed to support understanding across the state not only of the specific identification criteria for alternate student identification, but also, of the supports available on the general assessment and of the specific evidence that is needed to receive verification and provision of supports. Monitoring in Hawaii extends from alternate student identification to include the recording of student designated supports and accommodations in ELL, IDEA, and 504 student records. By increasing understanding of the available supports and monitoring the provision of designated supports and accommodations for the general assessment, the greatest access to the greatest number of students will be provided; and, fewer students will be inappropriately identified who may have been able to take the general assessment with accommodations or designated supports. Including additional monitoring of the ELL students designated supports is another measure to help reduce the number of ELL students who are taking the alternate form of the summative test.

The state plan rests on training and outreach so that each school is aware of the HSA-Alt Participation Guidelines, understands the available supports, and knows the state policies regarding the monitoring of supports. The plan extends to include parents as partners in understanding state requirements for participation, the design and basis for the alternate test, interpretation and use of the score report information, and potential ramifications of alternate test participation. Schools are expected to share this information with parents and train their staff on appropriate support provision and appropriate HSA-Alt student identification.

Oversight is conducted at the school level with school alternate test participation data serving as the impetus for the level of state oversight and support. A tiered model for intervention is used with schools identified for intervention based upon overage amounts. The tiered model considers schools with small enrollment numbers, and makes reasonable adjustments to the level of oversight depending upon school size. In addition, sub-group disproportionalities are embedded within the tiered plan so that targeted sub-group over-identification is integrally included. In addition, a school-based process is used for providing assurances and justifications with all schools above the 1% threshold required to consider their: overall and disabled student participation rates for the general form of the summative test for each content area, alternate test participation rates for each content area, and alternate student identification processes by referring to the current State criteria. Maximizing the number of students who participate in summative testing, safeguarding student subgroups, and ensuring that only those students with the most significant cognitive disabilities participate in the HSA-Alt are the foundations of Hawaii's plan. This plan is achievable through coordinated action and multiple tiers of communication.

B. Universal Support Mechanisms for Appropriate HSA-Alt Identification

The six mechanisms that HDOE will universally utilize to support school personnel in the appropriate identification of students for the HSA-Alt are described below. The six professional development leverage points will increase HDOE staff understanding of:

- 1) the options available for state testing: general assessment without accommodations, general assessment with accommodations, and alternate assessment, and the need to maintain a 95% participation rate for both the overall and the disabled student subgroup for each content area test: ELA, Mathematics, and Science;
- 2) the suite of accessibility supports: accommodations, designated supports, and universal tools available on the general assessment as well as guidelines, recommendations for use, and the importance of maintaining accurate, evidence-based student records for IDEA, 504, and ELL sub-groups so that necessary student supports can be verified, as needed, and assigned and provided during summative testing; and,
- 3) the specific criteria required for student identification for the Hawaii State Assessment - Alternate (HSA-Alt), an assessment based on the premise that only those students with

- the most significant cognitive disability are identified who would otherwise be incapable of participating in the general assessment even with accommodations;
- 4) the HSA-Alt Range Performance Level Descriptors (PLDs) that form the basis for the grade-level, standards-aligned modified curriculum, instructional learning targets, and performance expectations for students who take the alternate assessment;
 - 5) the importance of involving parents in the alternate student identification process and providing specific information on the nature of the alternate assessment and potential consequences of identifying a student for the alternate assessment; and
 - 6) the importance of increasing alternate student participation rate to 95% or greater with the result that more students are included in the accountability system and the Learner Characteristics Inventory survey results.

The six mechanisms taken together will result in a greater universal understanding of how to appropriately identify students for the alternate assessment and ensure that more students are appropriately identified, assessed, and provided with adequate levels of access, support, service, and accommodation.

The universal supports that are available for increasing HIDOE staff understanding of summative test options, accessibility supports, alternate student identification, performance expectations, parent communication obligations, and accountability system participation policies are numerous. The universal supports listed below are available to all schools and are undertaken as annual activities to ensure proper student identification for alternate testing. In most schools across the State, these universal supports are effective in maintaining school participation rates within the 1% federal guidelines. In some cases, however, additional State support is warranted for schools who exceed the 1.0% threshold. The next sections in this document lay out Hawaii's universal supports - the activities that are available to all schools - and Hawaii's tiered oversight and monitoring plan for schools that exceed the 1% threshold on HSA-Alt test participation.

Resources and Activities for All Schools

- [HSA-Alt Participation Guidelines, HSA-Alt Decision-Making Flowchart and HSA-Alt Participation Guidelines - Decision Making Questions and Case Study Examples](#) available since 2016.
- The *HSA-Alt Participation Guidelines*, updated March 14, 2019. Includes ELL red flag. Will be revisited and updated, as needed, on December 5, 2019 at annual HSA-Alt Stakeholder Meeting.
- [HSA-Alt Identification Process Memo](#), released April 12, 2018.
- HSA-Alt Supplemental Student Identification document- [Factors-and-Red-Flags-on-the-Road-to-HSA Alt-Student-Identification.pdf](#), including definitions for most significant cognitive disability and adaptive behavior, released Fall 2018.

- The HSA-Alt Student Identification Process and *HSA-Alt Participation Guidelines* shared at *Special Education Fall Summit* held in October each year.
- Special education teachers encouraged to attend the full-day *Accessibility and Accommodations Training* or the one-hour *Accessibility and Accommodations* presentation at the Hawaii Statewide Assessment Program Roadshow and Accessibility and Accommodations Training sessions held in September and October of 2019. Information on appropriate accommodation and designated support documentation and provision, the three assessment options available: the general assessment without accommodations, the general assessment with accommodations, and the Hawaii State Assessment- Alternate (HSA-Alt) is provided. Training materials are posted and made available online so that school staff may reference materials when conducting training sessions at their site. See [Accessibility and Accommodations Training Materials](#).
- All IEP team members and administrators encouraged to view a webinar recording of the Accessibility and Accommodations full-day training consolidated into a one-hour video recording that highlights test validity, Smarter Balanced constructs of measure: ELA Claims 1 and 2, Math Claim 1, and the definitions, recommendations for use, and criteria that the State uses for evaluating accommodation verification requests for Text-to-Speech, Speech-to-Text, and Multiplication Table accommodations. The process for documenting designated supports and accommodations in the State’s electronic eCSSS student record system and in the contracted test provider’s Test Information Distribution Engine for IDEA, 504, and ELL students are included in the recording and subsequent online posting on alohahsap.org website. See [Accessibility and Accommodations Webinar](#) recorded last year. This year’s webinar was recorded on September 26, 2019 and is not yet posted at the time of this submission.
- All IEP team members and administrators encouraged to view a webinar recording of 1% Federal Cap on Alternate Student Participation recorded and subsequently posted on alohahsap.org website. See [1% Webinar](#). This webinar was originally presented and recorded on December 6, 2018 and then re-presented and recorded on May 16, 2019 using updated information contained within the Waiver Extension Plan. The 1% Webinar for SY 2019-20 will air on November 21, 2019 and include these topics:
 - HSA-Alt Student Identification Process, including HSA-Alt Participation Guidelines
 - Location of online materials that support HSA-Alt student identification
 - HSA-Alt Supplemental Student Identification materials such as *Factors and “Red Flags” on the Road to Appropriate HSA-Alt Student Identification*
 - Characteristics of students with significant cognitive disability
 - Characteristics of Hawaii’s students who take the HSA-Alt Learner Characteristics Inventory (LCI) survey (teacher response)
 - HSA-Alt participation rate- state aggregate and complex area percentages

- General assessment overall and disabled student test participation rate for ELA, mathematics, and science test
- HSA-Alt Early Stopping Rule
- Current concerns
 - ELL disproportionality
 - Students with these disability categories: Specific Learning Disability, Emotional Disability, and Other Health Disability
 - Students with HSA-Alt “Exceeds” performance scores in ELA and mathematics
 - Alternate-identified student participating in HSA-Alt testing
- SY 2019-20 One Percent Threshold Plan
 - SY 2019-20 HSA-Alt IEP Rubric used for alternate-identified students.
 - SY 2018-19 School Assurance and Justification Form for all schools over 1%
Review three sections for School Assurance and Justification Form:
 - 1) calculation of disabled student summative test participation rates for ELA, mathematics, and science; 2) assurance that the HSA-Alt Participation Guidelines are used as a basis for alternate student identification; and 3) justification for overage.
 - Announcement about the public availability of School Assurance and Justification Form upon request.
- WIDA ACCESS 2.0 all-day face-to-face test administrator training required for all new WIDA test administrators and any other WIDA ACCESS 2.0 test administrators who request additional training; ; training includes a review of federal guidelines on testing that require the testing of at least 95% of all students and 95% of disabled students, State data showing overall and subgroup test participation rates for the general and alternate forms of the summative assessment, alternate student identification resources, information on the designated supports available for the general assessment, and designated support documentation requirements for IDEA, 504, and ELL students. Training will be held in Winter 2019-20.
- Smarter Balanced Test Administrator Training all-day face-to-face test administrator training required for all new Smarter Balanced test administrators and any other Smarter Balanced test administrators who request additional training; training includes a review of federal guidelines on testing that require the testing of at least 95% of all students and 95% of disabled students, State data showing overall and subgroup test participation rates for the general and alternate forms of the summative assessment, alternate student identification resources, information on the designated supports available for the general assessment, and designated support documentation requirements for IDEA, 504, and ELL students. Training will be held in Winter 2019-20
- Revision to *Learner Characteristics Inventory (LCI)* to include *HSA-Alt Participation Guidelines*, ELL Status, Student Disability Category, and additional measures of student skill level in ELA and Math.

HSA-Alt Test Administrator will affirm that the student meets all four criteria found in the *HSA-Alt Participation Guidelines* as an initial step in *LCI* completion; the ELL question will reinforce awareness of the State’s current initiative to address the over-identification of ELL students, and the additional *LCI* measures of student content skill will be used to gather more information on the characteristics of students who take the HSA-Alt. See [HSA-Alt Test Administration Manual, Appendix A: Learner Characteristics Inventory](#).

- HSA-Alt all-day face-to-face test administrator training required for all HSA-Alt test administrators; training includes a review of *HSA-Alt Student Identification Process* and other available online materials supporting appropriate student identification. Materials include the updated *HSA-Alt Participation Guidelines* and the *Factors and Red Flags* documents. These documents will be revisited in December 2019 HSA-Alt Stakeholder meeting. Mandatory HSA-Alt Test Administrator training will be held January 13 – 17, 2020.
- Monitoring of school science test participation rates with ongoing communication on school progress toward meeting the 95% participation rate for science.
- Targeted communication to Test Coordinators, SSCs, and high school Biology teachers at the opening of the testing window informing schools of the 95% participation requirement for all content area tests, including the importance of increasing the disabled student participation rate for the content area of science (the EOC Biology assessment serves as the high school general assessment science content-area test).

The tiers of support and activities described below began in fall 2018 and will continue in subsequent years. Schools found in support category 2 or 3 for HSA-Alt participation will receive additional support from HIDOE staff.

Categories of Support for HSA-Alt Student Identification Rate at the School Level

Category of Support	School Criteria
Universal Support	≤ 1% HSA-Alt Student Identification
Tier 1 – Needs Assistance	1.1% - 1.9 % HSA-Alt Student Identification 1.1% - 2.9 % HSA-Alt Student Identification Small n*
Tier 2 – Needs Intervention	2.0% - 2.9 % HSA-Alt Student Identification 3.0% - 4.9 % HSA-Alt Student Identification Small n*
Tier 3 – Needs Substantial Intervention	≥ 3.0% HSA-Alt Student Identification ≥ 5.0% HSA-Alt Student Identification Small n*
Tier 3, Year 2+ – Complex Area Superintendent Involvement	≥ 3.0% HSA-Alt Student Identification ≥ 5.0% HSA-Alt Student Identification Small n*

*Small n = The HIDOE recognizes the unique needs and challenges of small schools and the impact that small n sizes have on HSA-Alt Student Identification rates. Therefore, the tiers of support for schools that test fewer than 180 and more than 60 students in total have been adjusted accordingly. For schools with testing populations of 60 students or less, case by case review of participation rate overages will be undertaken with follow-up actions planned as needed.

Schools that remain in *Tier 1 – Needs Assistance* for three consecutive years, starting with fall 2018, will move into *Tier 2 – Needs Intervention*. Schools that remain in *Tier 2 – Needs Intervention* for two consecutive years, starting with fall 2018, will move into *Tier 3 – Needs Substantial Intervention*. Schools that remain in *Tier 3 – Needs Substantial Intervention* for two consecutive years, starting with fall 2018, will move into *Tier 3, Year 2+ – Complex Area Superintendent Involvement*. Schools that assess fewer than 180 students in total and exceed the 1.0% threshold on HSA-Alt participation across multiple years will be evaluated on an individual basis.

Descriptions for Categories of Support

Support to schools varies depending upon the degree of over-identification with tiered levels of oversight and monitoring reflecting the school’s over-identification rate. Underlying all tiered levels of support are the system-wide, universal supports focused on developing HIDOE Administration, General Education, Special Education, and Support staff understanding of appropriate identification for students who take the HSA-Alt.

Universal Supports

Activities	Timeframe
Schools encouraged to attend <i>Accessibility and Accommodations</i> full-day or one-hour training sessions	September - October
Schools encouraged to utilize posted <i>Accessibility and Accommodations</i> training materials to provide staff in-service at school site. Materials include <i>HSA-Alt Participation Guidelines</i> and <i>HSA-Alt Student Identification Process</i> .	September
Special education staff encouraged to view the <i>Accessibility and Accommodations</i> live or posted webinar.	September
Special education staff encouraged to learn about <i>HSA-Alt Participation Guidelines</i> and <i>HSA-Alt Student Identification Process</i> at the Special Education Fall Summit.	October
HSA-Alt Stakeholder Committee Meeting reviews current policies and guidelines for the assessment, including alternate test identification criteria and processes and test design and development.	November - December

Activities	Timeframe
<p>Special education staff encouraged to view the 1% Federal Threshold on Alternate Student Participation live or posted webinar. Webinar materials include current State, District, and Complex Area Data, Subgroup Disproportionality Data, updated <i>HSA-Alt Participation Guidelines</i>, and the HSA-Alt IEP Rubric used for tier 2 and 3 school at-desk IEP reviews.</p>	<p>November - December</p>
<p>Targeted communication to ELL Test Coordinators at 2019 WIDA-ACCESS 2.0 trainings on the updated <i>HSA-Alt Participation Guidelines</i>, the <i>HSA-Alt Student Identification Process</i>, and designated support documentation requirements for ELL students.</p>	<p>December</p>
<p>Targeted communication to Smarter Balanced Test Coordinators at 2019 Smarter Balanced Test Coordinator Training; training includes a review of federal guidelines on testing that require the testing of at least 95% of all students and 95% of disabled students, State data showing overall and subgroup test participation rates for the general and alternate forms of the summative assessment, alternate student identification resources, information on the designated supports available for the general assessment, and designated support documentation requirements for IDEA, 504, <u>and</u> ELL students.</p>	<p>December</p>
<p>HSA-Alt TA training (in-person and online) that includes review of test security and administration guidelines for the HSA-Alt and the updated <i>HSA-Alt Participation Guidelines</i>, <i>HSA-Alt Student Identification Process</i>, HSA-Alt Code of Ethics, HSA-Alt Range PLDs, HSA-Alt Training Test, HSA-Alt support categories: Universal Tools and Accommodations, Learner Characteristics Inventory, and Early Stopping Rule.</p>	<p>January</p>
<p>Targeted communication to Test Coordinators, SSCs, and high school Biology teachers at the opening of the testing window informing schools of the 95% participation requirement for all content area tests, including the importance of increasing the disabled student participation rate for the content area of science (the EOC Biology assessment serves as the high school general assessment science content-area test).</p>	<p>February</p>
<p>Monitoring of school science test participation rates with ongoing communication on school progress toward meeting the 95% participation rate for science.</p>	<p>February – May</p>
<p><i>Learner Characteristics Inventory</i> operational during open testing window with the updated LCI including <i>HSA-Alt Participation Guidelines</i> and additional teacher ratings of student skill level in ELA and Math. Test Administrator affirms during the LCI completion that the student meets all four criteria</p>	<p>February – May</p>

Activities	Timeframe
found in the <i>HSA-Alt Participation Guidelines</i> before continuing content area tests and provides response to ELL status question.	
<i>Assessment News</i> posted with email notification to schools that SY 2019-20 <i>1% Threshold Assurance and Justification Forms</i> are available upon request.	Summer

Tier 1 – Needs Assistance

Activities	Timeframe
All activities from Universal Support.	(same)
School’s HSA-Alt Test Coordinator, Special Education Department Chair, and/or Student Services Coordinator participate in 1% Threshold Webinar.	December
School’s HSA-Alt Test Coordinator, Special Education Department Chair, and/or Student Services Coordinator submit assurance that all IEP teams at the school are using the updated HSA-Alt Participation Guidelines to identify students for the HSA-Alt. Additional HSA-Alt decision-making support materials such as Factors-and-Red-Flags-on-the-Road-to-HSA Alt-Student-Identification.pdf are also available for IEP team consultation and available at the alohahsap.org site.	Deadline: January

Tier 2 – Needs Intervention

Activities	Timeframe
All activities from Universal Support and Category 1.	(same)
Student Services Coordinator submits documented assurance that IEP teams at the school are using the HSA-Alt Participation Guidelines to identify students for the HSA-Alt.	Deadline: January
Tier 2 school receives “at desk” IEP file review of HSA-Alt identified students. Email or phone inquiry to follow with Assessment Section providing additional on-site visit, as needed. Additional Assessment Section site visit to select schools will include HSA-Alt Student Identification training for the School Testing Coordinator, Student Services Coordinator, and/or Special Education Department Chair and alternate student test session observation during WIDA-ACCESS 2.0 or HSA-Alt testing windows. HSA-Alt IEP Rubric, school inquiries and observations include a focus on “Double Exceeds” or “target” sub-group status (currently ELL students for SY 2018-19).	January - April

Tier 3 – Needs Substantial Intervention: Year 1 (first year of Tier 3)

Activities	Timeframe
All activities from Universal Support and Categories 1 & 2.	(same)
Student Services Coordinator submits documented justification for high rate of alternate test student identification and complete needs-based assessment for school support and staff assistance in the use and application of the HSA-Alt identification criteria. The 2019 – 2020 Justification form includes the requirement that schools calculate both alternate test identification rate and summative test participation rate for students with disabilities in each content area- ELA, math, and science at the school level.	Deadline: January
Mandatory Assessment Section on-site school visit including: a) IEP file review for all “Double Exceeds” or sub-group “target” students (currently ELL students for SY 2018-19) at Tier 3 school; b) interview(s) with the School Testing Coordinator, Student Services Coordinator, and/ or Special Education Department Chair; and c) alternate student test session observation of identified “Double Exceeds” or “target” sub-group students during WIDA-ACCESS 2.0 or HSA-Alt testing window.	Winter - Spring

Tier 3 – Needs Substantial Intervention: Year 2+ (two or more years at Tier 3)

Activities	Timeframe
All activities from Universal Support and Categories 1, 2, and 3-Year 1	(same)
In-depth review of overage data and “Double Exceeds” or “target” sub-group (currently ELL students for SY 2019-20) data at Tier 3 sites with Complex Area Superintendent (CAS) during face-to-face/virtual meeting. CAS justification for 1% overage and any sub-group disproportionality required.	Fall
Site visits to observe students during instruction and review student IEP files with school support staff using HSA-Alt IEP Rubric that includes a focus on “target” sub-group status (currently ELL students for SY 2019-20): School Testing Coordinator/Student Services Coordinator/ Special Education Department Chair.	Winter - Spring

APPENDIX: 1% THRESHOLD ASSURANCE AND JUSTIFICATION FORM

Schools that exceed the 1% threshold on participation in the HSA-Alt are required to complete and submit this form to hsa-alt@notes.k12.hi.us, or FAX to 808-733-4483, by January 17, 2020.

School name: _____ Contact: _____

Email address: _____ Phone #: _____

CALCULATIONS

Please calculate your school's summative test participation rate for students with disability in the contents area of ELA, math, and science and your school's HSA-Alt student identification rate.

Participation Rate for Students with Disabilities in ELA, Math, and Science

1. Enter the total number of students at your school who are identified as students with disabilities who **participated** in each summative assessment- ELA, Math, and Science.

ELA _____ Math _____ Science _____

2. Enter the total number of students at your school who were **eligible to participate** in each summative assessment- ELA, Math, and Science.

ELA _____ Math _____ Science _____

3. Divide line 1 by line 2 for each content area, multiply by 100, and round to the hundredths.

ELA _____%. Math _____%. Science _____%.

HSA-Alt Identification Rate

1. Enter the total number of students at your school who are identified for the HSA-Alt assessment in grades 3-8, and 11. _____
2. Enter the total number of students at your school who are eligible to take a summative assessment (Smarter Balanced/ HSA Science/ Biology EOC, KA'EO, and HSA- Alt). _____
3. Divide line 1 by line 2 and multiply by 100 (round to the hundredths). _____%.

ASSURANCE

Please provide the following assurances for your school. *Check all that apply.*

- We encourage students with disabilities to take the summative assessments, including the HSA Science/Biology EOC/HSA-Alt if they are in the testing grades (3, 8, and 11) or enrolled in Biology.
- All IEP teams use the HSA-Alt Participation Guidelines to determine eligibility for participation in the alternate assessment.
- All students participating in the HSA-Alt meet the four criteria defined in the HSA-Alt Participation Guidelines.

JUSTIFICATION

Choose the justification statement that best reflects your school's situation. Be sure to provide additional information as requested.

- There is a school, community, and/or health program in the area that draws large numbers of students with significant cognitive impairments. Provide program description and the number of students from the program taking the HSA-Alt.

- The school's child count of students with disabilities is above the state average of 10 %. Percentage of students with disabilities: _____
- IEP teams lack the requisite knowledge to apply the HSA-Alt Participation Guidelines.
- Other. Please provide clarification or explanation. _____

SUPPORT AND TECHNICAL ASSISTANCE

What support or technical assistance does your school require to ensure that students are being assessed using the appropriate statewide summative assessment? *Check all that apply.*

- Training to understand and apply HSA-Alt participation criteria for:
 - SPED teachers
 - IEP team members
 - school leaders/others
- Training to understand and leverage allowable testing accommodations for:
 - SPED teachers
 - IEP team members
 - school leaders/others
- Training to understand the 1% threshold on HSA-Alt participation for:
 - SPED teachers
 - IEP team members
 - school leaders/others
- Other: _____

SIGNATURES

_____ Principal signature	_____ SSC signature
_____ Principal printed name	_____ SSC printed name
_____ Date	_____ Date

Scan and email this completed form to hsa-alt@notes.k12.hi.us, or FAX to 808-733-4483, by January 17, 2020. If you have any questions regarding this form, please contact Susan Forbes, Assessment Section Test Development Specialist, at susan.forbes@k12.hi.us or 808-307-3636.

CHANGE LOG

Change	Section	Date
1% Cap changed to 1% Threshold in accordance with federal change in language	Throughout document	07/02/2019
Updated activities to reflect SY 2019-20 implementation	Throughout document	07/02/2019
Tier 3 Activities include the submission of both alternate test identification rate and summative test participation rate for students with disabilities at the school level in each content area: ELA, math, and science. This is done as part of the Justification form submission process.	Tier 3- Needs Substantial Intervention, page 24	07/02/2019
Clarified single SEA/LEA for Hawaii DOE and steps for the coming school year.	Requirement 3: Assurances, page 15	07/02/2019
Added Conclusion	Conclusion, page 24	07/15/2019
Added Appendix	Appendix, page 25	07/30/2019
Posting of Public Availability of Assurances and Justification Announcement	Assurances A, Page 15	07/30/2019
Measures to Address Subgroup Disproportionalities Specifically Referenced	Assurances B, Page 16 State Plan and Timeline, Page 19-21, 23-25	07/30/2019
Stakeholder Meeting added to Universal Supports	State Plan and Timeline, Page 23	07/30/2019
Rewrite of opening narrative and evidence for 34 CFR §200.6(c)(4)(i-iv) Increase emphasis on 95% participation rate goal for students with disabilities in ELA, mathematics, and science test. Discuss changes in Assurance and Justification form, specifically disabled student test participation calculation and additional requirement that all schools that complete assurance also submit justification to the state on this same form. Add link to Assessment News notification of availability upon request of Assurance and Justification form. Update links to Alt Test Administration Manual (TAM), etc. Update training dates, Stakeholder Meeting, 1% Webinar, etc. Adjust Special Education Summit Activity	Pages 1-18	09/30/2019

<p>to reflect what we are doing this year. Add in description of Tier 3, Year 2. Add to Assessment Section training session information-sharing description: support teacher understanding of the designated supports available for the general assessment and designated support documentation for ELL students. This was done as another measure to address ELL disproportionality. Deleted conclusion.</p>		
<p>Edits to Appendix, due date January 17 and updated phone number and contact email</p>	<p>Pages 19-20</p>	<p>09/30/2019</p>
<p>SY 2018-19 Data for Science and Overall and Sub-group Participation Rates added. HSA-Alt participation rate of 1.3% and disabled student group participation rate of 92.9% added throughout. Additional measures to ensure that the State increases disabled student population participation in summative testing in the content area of science added: State testing data and information sharing on the 95% test participation requirement and current need to increase science test participation among disabled students to be included at WIDA and SB Test Administrator training; communication with SSCs, TCs, and high school Biology teachers about the 95% test participation requirement and current need to increase science test participation among disabled students; and, science test participation monitoring at the school level throughout the testing window with email notification of current progress and reminders to increase test participation rate to 95%.</p>	<p>Tables 3-5, narrative, Universal Support list and Universal Support chart, pages 1-21</p>	<p>09/30/2019</p>