



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Kathy Hoffman  
Superintendent of Public Instruction  
Arizona Department of Education  
1535 West Jefferson Street  
Phoenix, Arizona 85007

October 1, 2019

Dear Superintendent Hoffman:

Thank you for your participation in the U.S. Department of Education's (the Department's) assessment peer review process under Title I of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA). I appreciate the efforts of the Arizona Department of Education (ADE) to prepare for the English language proficiency (ELP) peer review that occurred in April 2019. Specifically, ADE submitted evidence regarding the Arizona English Language Learner Assessment (AZELLA).

The Elementary and Secondary Education Act (ESEA) and its implementing regulations require a State to ensure that its local educational agencies (LEAs) provide an annual ELP assessment of all English learners (ELs) in grades K-12 in schools served by the State (ESEA section 1111(b)(2)(G); 34 CFR § 200.6(h)). Specifically, the ESEA requires a State to develop a uniform statewide ELP assessment to measure the ELP of all ELs in the State, including ELs with disabilities, and to provide an alternate ELP assessment (AELPA) for ELs who are students with the most significant cognitive disabilities who cannot participate in the regular ELP assessment even with accommodations (ESEA section 1111(b)(2)(G); 34 CFR § 200.6(h)(1), (5)). The ESEA and its implementing regulations require that a State's ELP assessments, including the AELPA, be aligned with the State's ELP standards, provide valid and reliable measures of the State's ELP standards, and be of adequate technical quality (ESEA section 1111(b)(2)(G); 34 CFR §§ 200.2(b)(2), (b)(4), (b)(5), 200.6(h)(2)).

External peer reviewers and Department staff carefully evaluated ADE's submission and the Department found, based on the evidence received, that this component of your assessment system met some, but not all of the statutory and regulatory requirements of the ESEA. Based on the recommendations from this peer review and our own analysis of the State's submission, I have determined the following:

- General ELP assessment (AZELLA): **Partially meets requirements of the ESEA, as amended by ESSA.**

An assessment that partially meets requirements does not meet a number of the requirements of the statute and regulations and ADE will need to provide substantial additional information to demonstrate it meets the requirements. The Department realizes that this was the first time your State was required to provide its ELP assessment for peer review and recognizes that it may take some time to address all of the required items. The specific list of items required for ADE to submit is enclosed with this letter.

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*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

I also note that ADE did not submit evidence for an AELPA for ELs with the most significant cognitive disabilities who are unable to take the general ELP assessment. Within 30 days, ADE must provide a plan and timeline outlining when it will submit all required documentation for AZELLA peer review and the development and administration of an AELPA, including when this required assessment will be submitted for peer review. Resubmission should occur once all necessary evidence is complete (rather than in multiple submissions). The Department is placing a condition on ADE's Title I, Part A grant award. The condition shall remain until ADE's ELP and alternate ELP assessments have been determined to meet all requirements. If adequate progress is not made, the Department may take additional action.

Additionally, the Office of Special Education and Rehabilitative Services (OSERS) will monitor progress on matters pertaining to requirements in the Individuals with Disabilities Education Act (IDEA) related to the participation of students with disabilities in Title I assessments. In particular, OSERS will monitor progress against critical elements 1.4, 4.2, 5.1, and 5.3. Insufficient progress to address such matters may lead OSERS to place a condition on ADE's Federal fiscal year 2020 IDEA Part B grant award.

The full peer review notes from the review are enclosed. These recommendations to the Department formed the basis of our determination. Please note that the peers' recommendations may differ from the Department's feedback; we encourage you to read the full peer notes for additional suggestions and recommendations for improving your assessment system beyond what is noted in the Department's feedback. Department staff will reach out to your assessment director in the next few days to discuss the peer notes and the Department's determination and to answer any questions you have.

Thank you for your ongoing commitment to improving educational outcomes for all students. I look forward to our continued partnership as we move ahead with this critical work. 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](mailto:ESEA.Assessment@ed.gov).

Sincerely,

/s/

Frank T. Brogan  
Assistant Secretary for  
Elementary and Secondary Education

Enclosures

cc: Kelly Koenig, Associate Superintendent, Student Achievement and Educator Excellence Division  
Audra Ahumada, Deputy Associate Superintendent, Assessment Section

**Critical Elements Where Additional Evidence is Needed to Meet the Requirements for Arizona’s Use of the AZELLA as an English Language Proficiency Assessment**

| <b>Critical Element</b>   | <b>Additional Evidence Needed</b>  |
|---|--|
| <b>1.1 – State Adoption of ELP Standards for All English Learners</b>   | <p>For the State’s assessment system:</p> <ul style="list-style-type: none"> <li>• Evidence that the State has formally adopted K-12 English language proficiency (ELP) standards for all English learners (ELs) in public schools in the State (e.g., minutes of a State Board meeting that indicates a formal action to adopt ELP standards).</li> </ul>   |
| <b>1.2 – Coherent and Progressive ELP Standards that Correspond to the State’s Academic Content Standards</b> | <p>For the State’s ELP Standards, evidence that the ELP standards:</p> <ul style="list-style-type: none"> <li>• Address the different proficiency levels of ELs.</li> <li>• Align to the State academic content standards and contain language proficiency expectations that reflect the language needed for ELs to acquire and demonstrate their achievement of the knowledge and skills identified in the State’s academic content standards appropriate to each grade-level/grade-band in at least reading/language arts, mathematics, and science.</li> </ul>  |
| <b>1.3 – Required ELP Assessments</b>   | <p>For the AZELLA:</p> <ul style="list-style-type: none"> <li>• Evidence that the State’s assessment system includes an annual general and alternate ELP assessment (aligned with State ELP standards) administered to: All ELs, including ELs with the most significant cognitive disabilities. If the State does not administer an AELPA, it must provide a timeline when it plans to implement one.</li> </ul>  |
| <b>1.4 – Policies for Including All ELs in ELP Assessments</b>  | <p>For the AZELLA:</p> <ul style="list-style-type: none"> <li>• See evidence requested in critical element 1.3.</li> </ul>   |
| <b>2.1 – Test Design and Development</b>  | <p>For the AZELLA:</p> <ul style="list-style-type: none"> <li>• Test blueprints that describe the structure of each assessment in sufficient detail to support the development of assessments that are technically sound, measure the depth and breadth of the State’s ELP standards, and support the intended interpretations and uses of the results.</li> <li>• Processes to ensure that the ELP assessment is tailored to the knowledge and skills included in the State’s ELP standards and reflects appropriate inclusion of the range of complexity found in the standards (e.g., describe how the relationship between the test blueprint and test item development supports the knowledge and skills included in the ELP standards).</li> </ul> |
| <b>2.2 – Item Development</b>   | <p>For the AZELLA:</p> <ul style="list-style-type: none"> <li>• Evidence that the State uses reasonable and technically sound procedures to develop and select items to assess student English language proficiency based on the State’s ELP standards in terms of content and language processes (some of the evidence submitted for critical element 2.1 will address this critical element).</li> </ul>   |
| <b>2.3 – Test Administration</b>  | <p>For the AZELLA:</p> <ul style="list-style-type: none"> <li>• Evidence of established procedures to ensure that LEA staff have received necessary training to administer assessments and know how to administer assessments and know how to make use of appropriate accommodations during assessments for all ELs with disabilities.</li> </ul>  |

| Critical Element   | Additional Evidence Needed   |
|--|--|
| <b>2.5 – Test Security</b>   | <ul style="list-style-type: none"> <li>• Evidence the State has established contingency plans to address possible technology challenges during test administration.</li> </ul> <p>For the AZELLA:</p> <ul style="list-style-type: none"> <li>• Evidence the State has implemented and documented an appropriate set of policies and procedures to prevent test irregularities and ensure the integrity of test results through:               <ul style="list-style-type: none"> <li>○ Detection of test irregularities.</li> <li>○ Remediation following any test security incidents.</li> <li>○ Investigation of alleged or factual test irregularities (e.g., evidence that demonstrates how recommendations from the security audit report have been acted upon).</li> </ul> </li> </ul>                       |
| <b>3.1 – Overall Validity, including Validity Based on Content</b> | <p>For the AZELLA:</p> <ul style="list-style-type: none"> <li>• Evidence that the assessments measure the knowledge and skills specified in the State’s ELP standards, including:               <ul style="list-style-type: none"> <li>○ Documentation of adequate alignment between the State’s ELP assessment and the ELP standards the assessment is designed to measure in terms of language knowledge and skills, the depth and breadth of the State’s ELP standards, across all proficiency levels, domains, and modalities identified therein.</li> <li>○ Documentation of alignment between the State’s ELP standards and the language demands implied by, or explicitly stated in, the State’s academic content standards.</li> </ul> </li> </ul>   |
| <b>3.4 – Validity Based on Relationships with Other Variables</b>  | <p>For the AZELLA:</p> <ul style="list-style-type: none"> <li>• Evidence the State has documented adequate validity evidence that the ELP assessment scores are related as expected with other variables.</li> </ul>   |
| <b>4.2 – Fairness and accessibility</b>                            | <p>For the AZELLA:</p> <ul style="list-style-type: none"> <li>• Evidence that the assessments have been developed, to the extent practicable, using the principles of universal design for learning (UDL).</li> <li>• Evidence that the State has taken reasonable and appropriate steps to ensure that its assessments are accessible to all EL students and fair across student groups, including ELs with disabilities, in their design, development, and analysis. Specifically, evidence should demonstrate 1) how the writing assessment is accessible to multiple response modalities; 2) how the design of the listening and speaking tests is accessible to all ELs, including ELs with disabilities; and 3) how multiple modes of presentation are incorporated into item-writing guidelines.</li> </ul> |
| <b>4.3 – Full Performance Continuum</b>                            | <p>For the AZELLA:</p> <ul style="list-style-type: none"> <li>• Evidence that the assessment provides an adequately precise estimate of student performance across the full performance continuum for ELP assessments, including performance for EL students with high and low levels of English language proficiency.</li> </ul>  |
| <b>4.4 – Scoring</b>   | <p>For the AZELLA:</p> <ul style="list-style-type: none"> <li>• Evidence of standardized scoring procedures and protocols for its assessments that are designed to produce reliable and meaningful results (e.g., evidence of improved exact agreement in the human-scored portions of the writing assessments).</li> </ul>  |

| Critical Element   | Additional Evidence Needed   |
|--|--|
|  | <ul style="list-style-type: none"> <li>For ELs with a disability that precludes assessment in one or more of the required domains/components (listening, speaking, reading, and writing) such that there are no appropriate accommodations for the affected domain(s)/component(s), a description of how the State will ensure that the student is assessed in the remaining domain(s)/component(s) in which it is possible to assess the student.</li> </ul>  |
| <b>5.1 – Procedures for Including Students with Disabilities</b> | <p>For the AZELLA:</p> <ul style="list-style-type: none"> <li>Evidence of policies that require the inclusion of an EL with a disability that precludes assessment of the student in one or more of the required domains (speaking, listening, reading, and writing) such that there are no appropriate accommodations for the affected component (e.g., clarify the inclusion of deaf students in the speaking domain assessment).</li> </ul>   |
| <b>5.3 – Accommodations</b>                                      | <p>For the AZELLA:</p> <ul style="list-style-type: none"> <li>Evidence that the State ensures that appropriate accommodations are available for ELs (e.g., a rationale for the lack of a Braille version of the assessment).</li> <li>Evidence the State has determined that the accommodations it provides: (1) are appropriate and effective for meeting the individual student’s need(s) to participate in the assessments; (2) do not alter the construct being assessed; and (3) allow meaningful interpretations of results and comparison of scores for students who need and receive accommodations and students who do not need and do not receive accommodations.</li> </ul>   |
| <b>6.4 – Reporting</b>   | <p>For the AZELLA:</p> <ul style="list-style-type: none"> <li>Evidence that the State reports to the public its ELP assessment results for all ELs, including the number and percentage of ELs attaining ELP.</li> <li>Evidence that State provides coherent and timely information about each student’s attainment of the State’s ELP standards to parents that:               <ul style="list-style-type: none"> <li>Are, to the extent practicable, written in a language that parents and guardians can understand or, if it is not practicable to provide written translations to a parent or guardian with limited English proficiency, are orally translated for such parent or guardian.</li> <li>Upon request by a parent who is an individual with a disability as defined by the Americans with Disabilities Act (ADA), are provided in an alternative format accessible to that parent.</li> </ul> </li> </ul> |

U. S. DEPARTMENT OF EDUCATION

# Peer Review of State Assessment Systems

## April State ELP Assessment Peer Review Notes



U. S. Department of Education  
Office of Elementary and Secondary Education  
Washington, D.C. 20202

Note: Peer review notes provide the combined recommendations of the individual peers to the U.S. Department of Education (Department), based on the statute and regulations, the Department's peer review guidance, and the peers' professional judgement of the evidence submitted by the State. These assessment peer review notes, however, do not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for assessment peer review. Although the peer notes inform the Secretary's consideration of each State's assessment system, the Department makes the final decision regarding whether the assessment system meets the requirements in the statute and regulations. As a result, these peer notes may not completely align with the final determination made by the Department.

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Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

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Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona

SECTION 1: STATEWIDE SYSTEM OF STANDARDS AND ASSESSMENTS

Critical Element 1.1 – State Adoption of ELP Standards for All English Learners

| Critical Element  | Evidence (Record document and page # for future reference)   | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence   |
|---|--|--|
| <p><b><i>For English language proficiency (ELP) standards:</i></b></p> <p>The State formally adopted K-12 ELP standards for all ELs in public schools in the State.</p>   | <p>Arizona submitted the following evidence:<br/>                     AZ 1301 AZELLA ARS 15.756.01<br/>                     AZ 1302 AZELLA ARS 15.756.02<br/>                     AZ 1303 AZELLA State Board Minutes • p.3<br/>                     AZ 1304 AZELLA Task Force Minutes • pp. 1-7 AZ<br/>                     1305 AZELLA Structured English Immersion Models • pp. 5-7<br/>                     AZ 1306 AZELLA Revised ELP Standards (PowerPoint)</p> | <p>Documents do not provide complete evidence for this critical evidence.</p> <p>AZ 1306 didn't fully address this critical element. AZ 1303 is lacking a motion or formal adoption by the State Board.</p> <p>The State Board minutes reflect a presentation and brief discussion of the standards. No formal motion or indication of motion for adopting the standards is evident in AZ 1303 AZELLA State Board Minutes • p.3.</p> <p>State Board Meeting February 22, 2010.<br/>                     AZ 1306 dated April 14, 2011.</p> <p>Evidence lacked clarity in directly addressing the formal adoption of the K-12 ELP standards. Possible documentation to satisfy this element would be State Board minutes with formal motion adopting the standards and motion passing.</p> |
| <p><b>Section 1.1 Summary Statement</b></p>   |  |  |
| <p><u>X</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>• Evidence the State formally adopted K-12 ELP standards for all ELs in public schools in the State.</li> </ul> |  |  |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 1.2 – Coherent and Progressive ELP Standards that Correspond to the State’s Academic Content Standards**

| Critical Element   | Evidence (Record document and page # for future reference)   | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|--|--|---|
| <p><b>For ELP standards:</b><br/>The ELP standards:</p> <ul style="list-style-type: none"> <li>• are derived from the four domains of speaking, listening, reading, and writing;</li> <li>• address the different proficiency levels of ELs; and</li> <li>• align to the State academic content standards (see definition<sup>1</sup>). The ELP standards must contain language proficiency expectations that reflect the language needed for ELs to acquire and demonstrate their achievement of the knowledge and skills identified in the State’s academic content standards appropriate to each grade-level/grade-band in at least reading/language arts, mathematics, and science.</li> </ul> | <p>Arizona submitted the following evidence:<br/>           AZ 1307 AZELLA Kindergarten Standards<br/>           AZ 1308 AZELLA Grades 1-2 Standards<br/>           AZ 1309 AZELLA Grades 3-5 Standards<br/>           AZ 1310 AZELLA Grades 6-8 Standards<br/>           AZ 1311 AZELLA Grades 9-12 Standards<br/>           AZ 1312 AZELLA Task Force Presentation 2011 w- EAG Domain Findings<br/>           AZ 1313 AZELLA ELPS Guidance Document</p> <ul style="list-style-type: none"> <li>• Introduction to the English Language Proficiency Standards and Purpose Sections p. 1</li> </ul> <p>Peers cited additional evidence:<br/>           AZ 1300 AZELLA 2018 Technical Report v0.7, Appendix F.</p> | <p>The four domains are present.<br/>           Different proficiency levels of ELs are addressed for most standards.</p> <p>The alignment between the ELP standards and the language needed to demonstrate achievement in content areas isn’t evident; e.g., what do the standards say about the language needed to succeed in the science classroom?</p> <p>In the evidence provided the State indicates the language strand has been developed to address alignment between ELP and the language needed to acquire and demonstrate achievement of the content standards. Peers question whether this aspect of the critical element is fully addressed In the State’s ELP standards based on the research that links English Language Proficiency and content area achievement. Note that the evidence in AZ 1300 Appendix F shows that EL proficient and FEP students do not score as proficient or highly proficient on state ELA and math assessments at the same rate as Never EL students.</p> <p>The evidence provided by the State appears to be confounding standards for English language proficiency and reading/language arts. For example, standards for penmanship introduces construct irrelevant variance (e.g., AZ 1307 page 27). Further, these penmanship standards do not reflect the universal design principals the state cites in AZ 1312 slide 39. There are many more examples that could be cited.</p> <p>Some research evidence cited is not provided, for example, the WestEd Framework referenced in AZ 1312 (Slide 3). In</p> |

<sup>1</sup> see page 24 of “*A State’s Guide to the U.S. Department of Education’s Assessment Peer Review Process*”, September 24, 2018 available at: [www.ed.gov/admins/lead/account/saa.html](http://www.ed.gov/admins/lead/account/saa.html)

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

| <b>Critical Element</b>  | <b>Evidence (Record document and page # for future reference)</b> | <b>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</b>   |
|--|---|---|
|  |   | <p>other cases, how the research on language acquisition cited in AZ 1312 was used to develop the standards is not provided in the evidence.</p> <p>The peer reviewers assessment of the evidence presented for the ELP standards in this critical element, coupled with the evidence of performance on the content assessments raised significant concerns that impacted peer responses to other critical elements in this review (Critical Elements 2.1, 2.2, 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, 4.4, 4.5, 4.6, 6.1, 6.2, 6.3, 6.4).</p> |
| <b>Section 1.2 Summary Statement</b>   |   |   |
| <p><u>X</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>• Evidence that the ELP standards contain the language proficiency expectations that reflect the language needed for ELs to acquire and demonstrate achievement of the knowledge and skills identified in the State’s academic content standards, or evidence that the State has revised the standards to adequately address this critical element.</li> </ul> |   |   |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 1.3 – Required Assessments**

| <b>Critical Element</b>   | <b>Evidence (Record document and page # for future reference)</b>  | <b>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</b>  |
|---|--|--|
| <p>The State’s assessment system includes an <i>annual general and alternate ELP assessment</i> (aligned with State ELP standards) administered to:</p> <ul style="list-style-type: none"> <li>All ELs in grades K-12.</li> </ul>   | <p>AZ 1314 AZELLA ARS 15-756 – Identification of English language learners<br/>                     AZ 1315 AZELLA ARS 15-756.05 – Reassessment and reclassification of English language learners<br/>                     AZ 1316 AZELLA Draft Alternate ELPA Development Plan<br/>                     AZ 1317 CAAELP Letter of Intent (Arizona)</p> | <p>State’s evidence establishes that the State’s assessment system includes a general ELP assessment that should be administered to that all ELs in grades K-12.</p> <p>States acknowledges that it does not administer an alternate ELP assessment (AELPA) for ELs with significant cognitive disabilities who cannot take the general ELP assessment, even with accommodations.</p> <p>The State has not submitted an AELPA for ELs with significant cognitive disabilities for this peer review.</p> <p>The State did provide some evidence that it plans to participate in a multi-State collaboration to develop and AELPA. However the State provided no evidence of a timeline for this effort.</p> |
| <p><b>Section 1.3 Summary Statement</b></p>   |  |  |
| <p>X The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>evidence that the State includes ELs with significant cognitive disabilities in Statewide ELP assessment, either through the general ELP assessment or an alternate ELP assessment (AELPA).</li> </ul> |  |  |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 1.4 – Policies for Including All Students in Assessments**

| Critical Element   | Evidence (Record document and page # for future reference)  | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|--|---|---|
| <ul style="list-style-type: none"> <li>The State has policies that require the inclusion <i>of all public elementary and secondary ELs in the State’s ELP assessment</i>, including ELs with disabilities.</li> </ul>  | <p>AZ 1318 AZELLA 2018 Accommodation Guidelines Manual • p. 5<br/>                     AZ 1319 AZELLA The Examiner Newsletter February 2018 • pp. 7-10<br/>                     AZ 1320 AZELLA Guidance for Students with an EL Need and a SPED Need • pp. 1-2<br/>                     AZ 1321 AZELLA Test Administration Directions Stage III 2018 Reassessment • p. 1<br/>                     AZ 1322 AZELLA EL73 Student Need Report</p> | <p>State’s evidence establishes that the State’s assessment system includes all ELs in grades K-12, including ELs with disabilities. The exception (as noted in critical element 1.3) is that ELs with significant cognitive disabilities that cannot take the general ELP assessment do not have an alternate ELP assessment (AELPA) available.</p> <p>The State will need to provide evidence that is including these ELs in Statewide ELP assessment, either through the general ELP assessment or an AELPA.</p> <p>The State has not submitted an alternate ELP assessment (AELPA) for ELs with significant cognitive disabilities for this peer review.</p> <p>The State did provide some evidence that it plans to participate in a multi-State collaboration to develop and AELPA. However the State provided no evidence of a timeline for this effort.</p> |
| <p><b>Section 1.4 Summary Statement</b></p>  |   |   |
| <p>X As also noted in critical element 1.3, the following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>evidence that the State includes ELs with significant cognitive disabilities in Statewide ELP assessment, either through the general ELP assessment or an alternate ELP assessment (AELPA).</li> </ul> |   |   |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 1.5 – Meaningful Consultation in the Development of Challenging State Standards and Assessments**

(Note: this is a new requirement under ESSA, so it does not apply to standards and assessments adopted prior to the passage of ESSA (December 2015)).

| <b>Critical Element</b>   | <b>Evidence (Record document and page # for future reference)</b> | <b>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</b>   |
|---|---|---|
| <p>If the State has developed or amended challenging <i>ELP</i> standards and assessments, the State has conducted meaningful and timely consultation with:</p> <ul style="list-style-type: none"> <li>• State leaders, including the Governor, members of the State legislature and State board of education (if the State has a State board of education).</li> <li>• Local educational agencies (including those located in rural areas).</li> <li>• Representatives of Indian tribes located in the State.</li> <li>• Teachers, principals, other school leaders, charter school leaders (if the State has charter schools), specialized instructional support personnel, paraprofessionals, administrators, other staff, and parents.</li> </ul> | <p>n/a</p>  | <p>The State noted that the Arizona ELP standards were adopted prior to December 2015. Therefore, the State did not provide evidence for this critical element, as these criteria only apply to standards and assessments adopted after the passage of the ESSA in December, 2015.</p> <p>The State indicated that the Arizona Department of Education is currently in the process of revising ELP Standards to be aligned to the 2016 Arizona Academic Standards. The State has conducted meaningful and timely consultation with a diverse group of stakeholders.</p> <p>Department staff note that while the current ELP standards are not subject to this critical element, if significant revisions are made to the ELP standards, then there is an expectation that the State provide evidence of meaningful consultation in those revisions.</p> |
| <p><b>Section 1.5 Summary Statement</b></p>   |   |   |
| <p><u>  X  </u> No additional evidence is required, since the current ELP standards were adopted prior to the passage of the ESSA. However, if significant revisions are made to the ELP standards, then there is an expectation that the State provide evidence of meaningful consultation in those revisions.</p>   |   |   |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona

**SECTION 2: ASSESSMENT SYSTEM OPERATIONS**

**Critical Element 2.1 – Test Design and Development**

| Critical Element  | Evidence (Record document and page # for future reference)  | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|---|---|---|
| <p>The State’s test design and test development process is well-suited for the content, is technically sound, aligns the assessments to <i>the depth and breadth of the State’s ELP standards</i>, and includes:</p> <ul style="list-style-type: none"> <li>• Statement(s) of the purposes of the assessments and the intended interpretations and uses of results;</li> <li>• Test blueprints that describe the structure of each assessment in sufficient detail to support the development of assessments that are technically sound, measure the depth and breadth of <i>the State’s ELP standards</i>, and support the intended interpretations and uses of the results.</li> <li>• Processes to ensure that the ELP assessment is tailored to the knowledge and skills included in <i>the State’s ELP standards</i> and reflects appropriate inclusion of the range of complexity found in the standards.</li> <li>• If the State administers computer-adaptive assessments, the item pool and item selection procedures adequately support the test design and intended uses and interpretations of results.</li> <li>• If the State administers a computer-adaptive assessment, it makes proficiency determinations with respect to the grade in which the</li> </ul> | <p>Arizona submitted the following evidence:<br/>           OCR-DOJ AGREEMENT<br/>           AZ 1323 AZELLA OCR-DOJ Executed Resolution Agreement 8-31-12 • pp. 5-14<br/>           AZ 1324 AZELLA OCR-DOJ Closure Letter - Final<br/> <b>PURPOSE AND USE</b><br/>           AZ 1325 AZELLA Individual Student Report Back<br/>           AZ 1326 AZELLA Roster Report Front AZ 1327 AZELLA Roster Report Back<br/>           AZ 1300 AZELLA 2018 Technical Report • Chapter 1- Section 1.2; Purpose and Uses p. 1<br/>           AZ 1328 AZELLA Navigating Reports • pp. 4-6<br/>           AZ 1305 AZELLA Structured English Immersion Models • p.1<br/>           AZ 1314 AZELLA ARS 15-756 – Identification of English language learners<br/>           AZ 1315 AZELLA ARS 15-756.05 – Reassessment and reclassification of English language learners<br/>           AZ 1321 AZELLA Test Administration Directions Stage III 2018 Reassessment • p.1<br/>           AZ 1330 AZELLA Spring 2018 Training Session 1 • Slides 6-7<br/> <b>BLUEPRINT</b><br/>           AZ 1300 AZELLA 2018 Technical Report • Chapter 3- Section 3.3; Test Blueprint p. 6 AZ 1331 AZELLA Internal Test Blueprint<br/> <b>PROCESS TO ENSURE ASSESSMENT IS TAILORED TO ELP STANDARDS</b><br/>           AZ 1300 AZELLA 2018 Technical Report • Chapter 3-Section 3.1; Content Standards p. 5 AZ 1332 AZELLA Annual Test Development Procedures<br/>           AZ 1333 AZELLA Item Selection Spreadsheet (Stage V) SECURE</p> | <p>Technical Manual provides a generic purpose and use statement. The intended uses are stated. The intended interpretations are not fully addressed as illustrated in the student and roster reports (AZ1325 and AZ 1326). AZ 1328 includes a more thorough set of information regarding the intended uses and how specific features of the report support intended interpretations.</p> <p>Test Blueprint<br/>           The test blueprint provides the percentages (weights) of each domain for each stage.</p> <p>The blueprint does not provide the range of complexity nor provide guidance in measuring the depth and breadth of the State’s ELP standards. The evidence indicates construct under-representation in its design; for example, the blueprint indicates 0% coverage for some standards.</p> <p>Has the State considered whether some standards which were not assessible (as determined by process outlined in Section 3.2 of Technical Manual (page 5) in 2011—might now be assessible with technology and other advancements?</p> <p>In order to support the intended uses and results it is necessary to show that the test is designed to measure ELP across the range of proficiency levels defined by the standards and especially that it samples language at the most crucial decision point, namely whether it is appropriate to exit students from EL services.</p> <p>The test design and development evidence are fractured. A coherent picture of how the process connects across this</p> |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

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| <p>student is enrolled and uses that determination for all reporting. If the State administers a content assessment that includes portfolios, such assessment may be partially administered through a portfolio but may not be <i>entirely</i> administered through a portfolio.</p>                                  | <p>AZ 1334 AZELLA Language Strand Worksheet Sample<br/>AZ 1335 AZELLA Item Proficiency Level Analysis</p> | <p>critical element is difficult to see in the evidence provided for this element.</p> <p>Should the State revise its ELP standards in response to Critical Element 1.2, the test design and development will need to be revised as well.</p> |
| <p><b>Section 2.1 Summary Statement</b></p>   |   |   |
| <p><u>X</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>Evidence that demonstrates the connection between the blueprint and item development to address the range of complexity as well as the depth and breadth of the ELP standards.</li> </ul> |   |   |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 2.2 – Item Development**

| Critical Element  | Evidence (Record document and page # for future reference)   | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|---|--|---|
| <p>The State uses reasonable and technically sound procedures to develop and select items to:</p> <ul style="list-style-type: none"> <li>Assess student English language proficiency based on the <i>State’s ELP standards</i> in terms of content and language processes.</li> </ul> | <p>Arizona submitted the following evidence:</p> <p><b>ITEM WRITING</b></p> <p>AZ 1300 AZELLA 2018 Technical Report</p> <ul style="list-style-type: none"> <li>Chapter 2-Involvement of Arizona Educators at all Levels pp. 3-4</li> <li>Section 3.2; Item Specifications p. 5</li> </ul> <p>AZ 1336 AZELLA Item Writing Procedures</p> <p>AZ 1337 AZELLA Priority and Statistical Review Criteria</p> <p>AZ 1338 AZELLA Item Writing Training PowerPoint</p> <p>AZ 1339 AZELLA Assessable Standards</p> <p>AZ 1340 AZELLA Item Specs Stage I</p> <p>AZ 1341 AZELLA Item Specs Stage II</p> <p>AZ 1342 AZELLA Item Specs Stage III</p> <p>AZ 1343 AZELLA Item Specs Stage IV</p> <p>AZ 1344 AZELLA Item Specs Stage V</p> <p>AZ 1345 AZELLA Item Writing Committee Members</p> <p>AZ 1346 AZELLA Continuing FT Item Writing PowerPoint</p> <p>AZ 1347 AZELLA Edynn Sato – Language for Achievement</p> <p>AZ 1348 AZELLA Common Core Math Terms</p> <p>AZ 1349 AZELLA Item Writing Materials List</p> <p>AZ 1350 AZELLA DOK Chart</p> <p>AZ 1351 AZELLA Target Lexile Ranges</p> <p>AZ 1409 AZELLA Language Strand Worksheet – Sample</p> <p>AZ 1430 Arizona Style Guide</p> <p><b>ITEM REVIEWS</b></p> <p>AZ 1300 AZELLA 2018 Technical Report</p> <ul style="list-style-type: none"> <li>Chapter 2-Involvement of Arizona Educators at all Levels pp. 3-4</li> </ul> | <p>Evidence is provided of generally reasonable and sound technical procedures for item writing (training and guidance for committees, for example) and psychometric criteria for item review and selection (AZ 1300 section 4.2 and AZ 1337) from 2012 through 2016.</p> <p>Dates of evidence from 2012 through 2017 make it difficult to have a clear idea of the timeline and cycle—what is annual, what is happening ad hoc, etc.</p> <p>Documentation that summarizes the historical development in the context of the current development cycle would be helpful for stakeholders as well as peers in establishing that the State uses a reasonable and technically sound set of procedures.</p> <p>Should the State revise its ELP standards in response to Critical Element 1.2, the item specifications will need to be revised as well.</p> |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

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|  | <p>AZ 1352 AZELLA Content &amp; Bias Review Procedures<br/>         AZ 1353 AZELLA Content &amp; Bias Review Training PowerPoint<br/>         AZ 1354 AZELLA Data Review Agenda<br/>         AZ 1355 AZELLA Data Review Book Sample Page AZ<br/>         1356 AZELLA Item Review Stats Flags<br/>         AZ 1357 AZELLA Checklist for AZELLA Content and Bias Review<br/>         AZ 1358 AZELLA Continuing Development Content and Bias Review PowerPoint<br/> <b>TEST CONSTRUCTION AND REVIEWS</b><br/>         AZ 1300 AZELLA 2018 Technical Report<br/>         • Chapter 4-Test Construction pp. 10-15<br/>         AZ 1359 AZELLA Development Cycle<br/>         AZ 1360 AZELLA Comparability Study<br/>         AZ 1361 AZELLA Development Plan Sample<br/>         AZ 1362 AZELLA Gap Analysis - Sample<br/>         AZ 1363 AZELLA Development PowerPoint<br/>         AZ 1364 AZELLA Metadata Reading and Listening Passages – Sample<br/>         AZ 1365 AZELLA ABBI Migration Coordinator Process<br/>         AZ 1366 AZELLA ABBI Review<br/> <b>ITEM SELECTION</b><br/>         AZ 1367 AZELLA Item Selection Procedures<br/>         AZ 1368 AZELLA Item Selection Psychometric Review Sample<br/>         AZ 1333 AZELLA Item Selection Spreadsheet (Stage V) SECURE<br/>         AZ 1369 AZELLA Speaking Item Selection<br/>         AZ 1370 AZELLA Operational and Field Test Item Stats – Sample<br/>         AZ 1371 AZELLA Item Selection Worksheet WestEd</p> |  |
| <p><b>Section 2.2 Summary Statement</b></p>                                    |   |  |
| <p><input checked="" type="checkbox"/> No additional evidence is required.</p> |   |  |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

## STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona

### Critical Element 2.3 – Test Administration

| Critical Element   | Evidence (Record document and page # for future reference)  | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|--|---|---|
| <p>The State implements policies and procedures for standardized test administration; specifically, the State:</p> <ul style="list-style-type: none"> <li>• Has established and communicates to educators clear, thorough and consistent standardized procedures for the administration of its assessments, including administration with accommodations;</li> <li>• Has established procedures to ensure that general and special education teachers, paraprofessionals, teachers of ELs, specialized instructional support personnel, and other appropriate staff receive necessary training to administer assessments and know how to administer assessments, including, as necessary, alternate assessments, and know how to make use of appropriate accommodations during assessments for all students with disabilities;</li> <li>• If the State administers technology-based assessments, the State has defined technology and other related requirements, included technology-based test administration in its standardized procedures for test administration, and established contingency plans to address possible technology challenges during test administration.</li> </ul> | <p>Arizona submitted the following evidence:</p> <p>AZ 1300 AZELLA 2018 Technical Report</p> <ul style="list-style-type: none"> <li>• Chapter 5-Test Administration pp. 16-26</li> </ul> <p>AZ 1330 AZELLA Spring 2018 Training Session 1</p> <p>AZ 1372 AZELLA Spring 2018 Training Session 2</p> <p>AZ 1373 AZELLA Spring 2018 Training Session 3</p> <p>AZ 1374 AZELLA Spring 2018 Training Session 4</p> <p>AZ 1374 AZELLA Spring 2018 Training Session 5</p> <p>AZ 1321 AZELLA Test Administration Directions Stage III 2018 Reassessment</p> <p>AZ 1376 AZELLA 2018 Test Coordinator Manual</p> <p>AZ 1377 AZELLA TestNav Tutorial</p> <p>AZ 1378 AZELLA PearsonAccess Next User’s Guide</p> <p>AZ 1318 AZELLA Accommodation Guidelines Manual</p> <ul style="list-style-type: none"> <li>• Section 4 pp. 8-13 and pp. 29-30</li> </ul> <p>AZ 1320 AZELLA Guidance for Students with an EL Need and a SPED Need</p> <p>AZ 1379 AZELLA Headphone and Microphone Requirements</p> <p>AZ 1380 AZELLA Pearson Technology Contingency Summary</p> <p>AZ 1381 AZELLA Sample email week 2</p> <p>AZ 1382 AZELLA OELAS Annual Conference</p> <p>AZ 1383 AZELLA Image from AZELLA Website</p> <p>AZ 1384 AZELLA Speaking Test Room Logistics</p> <p>AZ 1385 AZELLA Focus Group Notes</p> <p>AZ 1477 AZELLA Technology Requirements for TestNav 8</p> | <p>Materials that provide clear, standardized general assessment administration procedures are evident when considering the multiple documents provided as evidence. For example, PowerPoints AZ 1330 and 1372-1375 provide evidence of the content of test administration training for spring 2018 covers all grade levels. The test Administration Directions and Test Coordinator Manual include additional details for standardized procedures in administration. Coordinators’ manual includes information about procedures and denotes who is responsible for providing training on the procedures.</p> <p>Peers’ commented with regards to the critical element requirement in the bullet “Has established procedures... know how to administer assessments, including, as necessary, alternate assessments, and know how to make use of appropriate accommodations during assessments for all students with disabilities;” that the content of the training, specifically supporting standardized administration using accommodations or identifying whether an accommodation needed seems to be lacking in the specific evidence provided in this section.</p> <p>Evidence that personnel accessed or attended available trainings or used the appropriate procedures (“ensure...”) was not provided. How does the State ensure that the established procedures are followed and that the necessary training has occurred and been applied in the testing setting?</p> <p>Although document AZ1320 provides clear guidance, some elements will need to be updated when the state has an appropriate alternate assessment for ELP for students with significant cognitive disabilities.</p> |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

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|  |  | Clear procedures for possible technology challenges need to address specific situations that have been encountered or are possible and how teachers/test coordinators should address them specifically within each of those scenarios. |
| <b>Section 2.3 Summary Statement</b>   |  |  |
| <p><u>X</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>• Evidence that personnel accessed or attended available trainings or used the appropriate procedures (‘ensure...’).</li> <li>• More specific procedures supporting standardized administration using accommodations or identifying whether an accommodation is needed in particular cases should be added to training materials. For example, scenarios or use cases can be helpful in illustrating these processes particularly in addressing frequently asked questions.</li> <li>• Clear procedures for possible technology challenges need to address specific situations that have been encountered or are possible and how teachers/test coordinators should address them specifically within each of those scenarios.</li> </ul> |  |  |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 2.4 – Monitoring Test Administration**

| <b>Critical Element</b>  | <b>Evidence (Record document and page # for future reference)</b>   | <b>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</b>   |
|--|---|---|
| <p>The State adequately monitors the administration of its State assessments to ensure that standardized test administration procedures are implemented with fidelity across districts and schools. Monitoring of test administration should be demonstrated for all assessments in the State system: the general ELP assessments and the AELPA.</p> | <p>AZ 1386 AZELLA 2018 Assessment Observation Pre-Observation Survey<br/>                     AZ 1387 AZELLA Notification of Planned Observation - Sample<br/>                     AZ 1388 AZELLA Monitoring Training Notes<br/>                     AZ 1389 AZELLA Test Administration Observation Checklist<br/>                     AZ 1390 AZELLA Assessment Observation Training Internal 2018<br/>                     AZ 1391 AZELLA Caveon Training<br/>                     AZ 1392 AZELLA 2018 Assessment Observation Protocol<br/>                     AZ 1393 AZELLA Test Irregularity Report<br/>                     AZ 1394 AZELLA 2018 AZELLA Observation Responses<br/>                     AZ 1395 AZELLA 2018 Assessment Observations Presentation<br/>                     AZ 1396 AZELLA Follow-up Letter - Sample</p> | <p>The State provided direct evidence that monitoring the ELP assessment had occurred in the 2018 administration. A “pre-observational survey and various protocol forms were provided. Roles and responsibilities of staff involved in monitoring were demonstrated.</p> <p>Evidence of observer training was provided. Several summary reports monitoring visits and follow up were provided.</p> <p>Staff note that the State did not provide evidence of the plan used to select schools for monitoring visits.</p> <p>Overall, there was adequate evidence that monitoring of the ELP assessments was occurring to ensure that standardized administration procedures were being implemented with fidelity across districts and schools. Staff would suggest that the State consider making the observation site selection process more transparent, and document this process for internal use.</p> |
| <p><b>Section 2.4 Summary Statement</b></p>  |   |   |
| <p>X No additional evidence is required.</p>   |   |   |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 2.5 – Test Security**

| Critical Element  | Evidence (Record document and page # for future reference)  | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence   |
|---|---|--|
| <p>The State has implemented and documented an appropriate set of policies and procedures to prevent test irregularities and ensure the integrity of test results through:</p> <ul style="list-style-type: none"> <li>Prevention of any assessment irregularities, including maintaining the security of test materials (both during test development and at time of test administration), proper test preparation guidelines and administration procedures, incident-reporting procedures, consequences for confirmed violations of test security, and requirements for annual training at the district and school levels for all individuals involved in test administration;</li> <li>Detection of test irregularities;</li> <li>Remediation following any test security incidents involving any of the State’s assessments;</li> <li>Investigation of alleged or factual test irregularities.</li> <li>Application of test security procedures to the general ELP assessments and the AELPA.</li> </ul> | <p>Arizona submitted the following evidence:<br/>AZ 1300 AZELLA 2018 Technical Report</p> <ul style="list-style-type: none"> <li>Chapter 5-Test Administration pp. 16-27</li> <li>Chapter 6-6.1.6 Security p. 31</li> <li>Chapter 5-5.3 Test Security pp. 18-19</li> </ul> <p>AZ 1376 AZELLA Spring 2018 Test Coordinator’s Manual • After Testing p. 5; Test Security pp. 9-11; and Student Confidentiality and Test Irregularities pp. 9-11<br/>AZ 1321 AZELLA Test Administration Directions Stage III 2018 Reassessment • Test Security p. 4; and Monitoring Testing p. 11<br/>AZ 1397 AZELLA Assessment Test Security Agreement for Superintendent and District Test Coordinator<br/>AZ 1398 AZELLA 17_18 TestSecurityAgreementStaff<br/>AZ 1399 AZELLA Ethical Practices for Testing – District Observations<br/>AZ 1400 AZELLA TestSecurity-and-Ethics-PDforWeb<br/>AZ 1401 AZELLA Quality Assurance Checklist for Test Security and Ethics<br/>AZ 1393 AZELLA Test Irregularity Report<br/>AZ 1378 AZELLA PearsonAccess Next User’s Guide • Entering Test Irregularities pp. 77-79<br/>AZ 1402 AZELLA Spring 2018 Test Irregularity Sheet and Email Response<br/>AZ 1403 AZELLA Security Availability Confidentiality Report ABBI (2017)<br/>AZ 1404 AZELLA Security Availability Confidentiality Report TestNav8 (2017)<br/>AZ 1405 AZELLA Pearson Data Security Summary<br/>AZ 1406 AZELLA Systems Integration chart<br/>AZ 1407 AZELLA Assessment Test Security Audit-unedited</p> | <p>External Auditors (AZ 1407) provided specific recommendations on ensuring test security.</p> <p>Evidence is needed across the following areas: detection, remediation, investigation. For example:</p> <ul style="list-style-type: none"> <li>Evidence to support the extent to which the recommendations from the test security audit have been acted upon, particularly for detection, investigation, and remediation is needed.</li> <li>For example, a memo detailing how the high priority recommendations in the audit report (AZ 1407) were addressed, will be addressed, or why the recommendations are not relevant.</li> </ul> <p>Audit recognized that many separate elements were in place to prevent test irregularities and detect testing irregularities at the time of the audit (2015).</p> <p>A general guide that brings together the procedures for prevention, detection, investigation, and remediation systematically would be beneficial.</p> |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona

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| <b>Section 2.5 Summary Statement</b>  |  |  |
| <u>X</u> The following additional evidence is needed/provide brief rationale: <ul style="list-style-type: none"><li>• Evidence of how the State has implemented and documented an appropriate set of policies and procedures to ensure the integrity of test results through detection of test irregularities; remediation following any test security incidents involving any of the State’s assessments; and investigation of alleged or factual test irregularities.</li></ul> |  |  |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

## STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona

### Critical Element 2.6 – Systems for Protecting Data Integrity and Privacy

| Critical Element  | Evidence (Record document and page # for future reference)   | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|---|--|---|
| <p>The State has policies and procedures in place to protect the integrity and confidentiality of its test materials, test-related data, and personally identifiable information, specifically:</p> <ul style="list-style-type: none"> <li>• To protect the integrity of its test-related data in test administration, scoring, storage and use of results;</li> <li>• To secure student-level assessment data and protect student privacy and confidentiality, including guidelines for districts and schools;</li> <li>• To protect personally identifiable information about any individual student in reporting, including defining the minimum number of students necessary to allow reporting of scores for all students and student groups.</li> </ul> | <p>Arizona submitted the following evidence:<br/>AZ 1300 AZELLA 2018 Technical Report</p> <ul style="list-style-type: none"> <li>• Chapter 5; Test Administration pp. 16-27</li> <li>• Chapter 6: 6.1.6 Security p. 31</li> <li>• Chapter 5-5.3 Test Security pp. 18-19</li> </ul> <p>AZ 1376 AZELLA 2018 Test Coordinator Manual<br/>• After Testing p. 5; Test Security pp. 9-11; and Student Confidentiality and Test Irregularities pp. 9-11</p> <p>AZ 1321 AZELLA Test Administrator Directions Stage III 2018 Reassessment • Test Security p. 4; and Monitoring Testing p. 11</p> <p>AZ 1408 AZELLA State Test Security Policy &amp; Procedures<br/>AZ 1409 AZELLA AZ Student Data Collection and Protection<br/>AZ 1410 AZELLA AZ Custom and Non-Custom Data File Requests<br/>AZ 1403 AZELLA Security Availability Confidentiality ABBI (2017)<br/>AZ 1404 AZELLA Security Availability Confidentiality TestNav8 (2017)<br/>AZ 1405 AZELLA Pearson Data Security Summary<br/>AZ 1380 AZELLA Pearson Technology Contingency Summary</p> | <p>Sufficient evidence has been provided that the State has policies and procedures in place to protect the integrity and confidentiality of test materials, test-related data, and PII.<br/>This evidence is provided in the following:</p> <ul style="list-style-type: none"> <li>• Written chain of custody for protecting the integrity of the test-related data from administration through scoring, storage and use (AZ 1376, 1321, 1408, &amp; 1409).</li> <li>• Written procedures for protecting student privacy and PII (AZ 1409).</li> </ul> |
| <p><b>Section 2.6 Summary Statement</b></p> <p><input checked="" type="checkbox"/> No additional evidence is required.</p>  |  |   |

## SECTION 3: TECHNICAL QUALITY – VALIDITY

### Critical Element 3.1 – Overall Validity, Including Validity Based on Content

| Critical Element | Evidence (Record document and page # for future reference) | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence |
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Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

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| <p>The State has documented adequate overall validity evidence for its assessments consistent with nationally recognized professional and technical testing standards. The State’s validity evidence includes evidence that:</p> <p><i>The State’s ELP assessments</i> measure the knowledge and skills specified in the State’s ELP standards, including:</p> <ul style="list-style-type: none"> <li>• Documentation of adequate alignment between the State’s ELP assessment and the ELP standards the assessment is designed to measure in terms of language knowledge and skills, <u>the depth and breadth of the State’s ELP standards, across all proficiency levels, domains, and modalities identified therein;</u></li> <li>• Documentation of alignment (as defined) between the State’s ELP standards and the language demands implied by, or explicitly stated in, the State’s academic content standards;</li> <li>• If the State administers an AELPA aligned with alternate ELP achievement standards, the assessment shows adequate linkage to the State’s ELP standards in terms of content match (i.e., no unrelated content) and that the breadth of content and linguistic complexity determined in test design is appropriate for ELs who are students with the most significant cognitive disabilities.</li> </ul> | <p>Arizona submitted the following evidence:<br/> AZ 1300 AZELLA 2018 Technical Report<br/> • Chapter 10-Section 10.2.1 Evidence Based on Test Content pp. 77-78<br/> AZ 1359 AZELLA Development Cycle<br/> AZ 1411 AZELLA 2016 AZELLA Development Plan<br/> AZ 1412 AZELLA Gap Analysis Counts – Sample<br/> <b>WEBB ALIGNMENT</b><br/> AZ 1414 AZELLA Webb Alignment Report<br/> <b>ACADEMIC LANGUAGE</b><br/> AZ 1234 AZELLA Language Strand Worksheet – <b>Sample</b><br/> AZ 1413 AZELLA Language Demands<br/> AZ 1348 AZELLA Common Core Math Terms<br/> AZ 1312 AZELLA Task Force Presentation 2011 w- EAG Domain Findings<br/> <b>ELA/ELP LINKAGE AZ 1300 AZELLA 2018</b><br/> Technical Report • Appendix F. AZELLA REASSESSMENT RESULTS IN RELATION TO AZMERIT RESULTS pp. 341-358<br/> <b>HISTORY OF VALIDITY</b><br/> AZ 1415 AZELLA Validity and Reliability Report AZ1 &amp; AZ2 • pp. 17-18</p> | <p>The evidence submitted includes a combination of alignment studies from the AZ-2 (AZ 1415), 2013 AZ-3 (AZ 1414), coupled with AZELLA Gap Analysis counts and Development plan (AZ1411 and 1412). These reports indicate construct under-representation in some areas in terms of depth and breadth of the assessment across all proficiency levels...and modalities....</p> <p>In order to support the intended uses and results of the assessment it is necessary to show that the test results in scores that reflect students’ knowledge and skills in ELP across the range of proficiency levels defined by the standards and especially that it provides valid and accurate classification to inform instructional decisions (intended use) and exit from services.</p> <p>The evidence provided in the ELA/ELP Linkage (AZ1300 pp 341-358) indicates EL proficient and FEP students do not score as proficient or highly proficient on state ELA and math assessments at the same rate as Never EL students.</p> <p>Should the State revise its ELP standards in response to Critical Element 1.2, the evidence for this critical element will need to be revised.</p> |
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Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

## STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona

### Section 3.1 Summary Statement

X The following additional evidence is needed/provide brief rationale:

- Evidence the assessments have been revised to improve alignment of the State's ELP assessment and the ELP standards the assessment is designed to measure in terms of language knowledge and skills, the depth and breadth of the State's ELP standards, across all proficiency levels, domains, and modalities identified therein; and Evidence these revisions have resulted in improved alignment.
- Evidence the assessments have been revised to improve alignment of the State's ELP standards and the language demands implied by, or explicitly stated in, the State's academic content standards; and evidence these revisions have resulted in improved alignment.

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 3.2 – Validity Based on Linguistic Processes**

| Critical Element  | Evidence (Record document and page # for future reference)   | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence   |
|---|--|--|
| <p>The State has documented adequate validity evidence that its assessments tap <i>the intended language processes</i> appropriate for each grade level/grade-band as represented in the State’s ELP standards.</p> | <p>Arizona submitted the following evidence:<br/>                     AZ 1300 AZELLA 2018 Technical Report<br/>                     • Appendix F. AZELLA REASSESSMENT RESULTS IN RELATION TO AZMERIT RESULTS pp. 341-358<br/>                     AZ 1414 AZELLA Webb Alignment Report<br/>                     AZ 1418 AZELLA Passage Lexiles<br/>                     AZ 1416 AZELLA Reading and Listening Passage Metadata<br/>                     AZ 1417 AZELLA KPT pre-LAS Concurrent Validity Study<br/>                     AZ 1351 AZELLA Target Lexile Ranges</p> | <p>To the extent indicated in the validity evidence submitted, the assessment is measuring some of the intended language processes as represented in the 2011 standards for ELP.</p> <p>Should the State revise its ELP standards in response to Critical Element 1.2, the evidence for this critical element will need to be revised.</p> |
| <p><b>Section 3.2 Summary Statement</b></p>   |  |  |
| <p><input checked="" type="checkbox"/> No additional evidence is required</p>   |  |  |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 3.3 – Validity Based on Internal Structure**

| Critical Element   | Evidence (Record document and page # for future reference)  | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|--|---|---|
| <p>The State has documented adequate validity evidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State’s <i>ELP standards</i> on which the intended interpretations and uses of results are based.</p> | <p>Arizona submitted the following evidence:<br/> <b>VALIDITY EVIDENCE BASED ON INTERNAL STRUCTURE</b><br/>                     AZ 1300 AZELLA 2018 Technical Report</p> <ul style="list-style-type: none"> <li>• Chapter 10-Evidence Based on Internal Structure Section 10.2.3 pp. 77-79</li> </ul> <p><b>POINT-BISERIAL CORRELATION</b></p> <ul style="list-style-type: none"> <li>• Chapter 7-Section 7.3 Classical Item Analysis pp. 48-51; Table 7.3 p. 49; and A.1-A.20 pp. 116-128</li> </ul> <p><b>DIMENSIONALITY</b></p> <ul style="list-style-type: none"> <li>• Chapter 8-Section 8.6.1 p. 59; Table 8.3 p. 60; and Figure B.17-B.27 pp. 159-164</li> </ul> <p><b>ITEM DIF ANALYSIS</b></p> <ul style="list-style-type: none"> <li>• Chapter 10-Section 10.3 DIF pp. 84-87; Table 10.8 p. 87; and Tables G.1-G.40 pp. 359-389</li> </ul> <p><b>SUB-TEST/DOMAIN ANALYSIS</b></p> <ul style="list-style-type: none"> <li>• Chapter 7-Section 7.3 Classical Item Analysis pp. 49- 51; Point-biserial correlation for domain in Table 7.3 p. 49; and Tables A.1-A.20 pp. 116-128</li> <li>• Chapter 9-Test Results pp. 62-69; Table 9.1 (Overall Proficiency Level) pp. 63-64; and Table 9.2 (Total Proficiency Level) pp. 63-64</li> </ul> | <p>The state has made an effort to document validity evidence regarding the internal consistency and structure of the assessments with regards to the domains of the standards.</p> <p>The CogLabs were provided for evidence in this section. It is not clear to the peer reviewers how this evidence was used to enhance the assessment to ensure the intended interpretations and uses of the results are supported. For example, background noise was noted, and a recommendation was made to update the test administration guidelines. Were guidelines updated to address this concern?</p> <p>Should the State revise its ELP standards in response to Critical Element 1.2, the evidence for this critical element will need to be revised.</p> |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

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|   | <ul style="list-style-type: none"> <li>• Chapter 10-Section 10.4 - Correlation among domains/subdomains pp. 87-93 and Tables 10.9-10.19 pp. 88-94</li> </ul> <p><b>COG LABS</b><br/> AZ 1419 AZELLA 2013 Field Test Technical Report</p> <ul style="list-style-type: none"> <li>• Chapter 2; Section 2.4 p. 10</li> </ul> <p>AZ 1420 AZELLA Cog Lab Schedule<br/> AZ 1421 AZELLA Cog Lab Script<br/> AZ 1422 AZELLA Speaking Cog Labs – Computer Delivered Tests</p> |  |
| <b>Section 3.3 Summary Statement</b>  |  |  |
| <p><u>X</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>• Adequate validity evidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State’s <i>ELP standards</i> on which the intended interpretations and uses of results are based. For example, how/when were revisions made based on the results of the Cognitive Labs?</li> </ul> |  |  |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 3.4 – Validity Based on Relations to Other Variables**

| Critical Element  | Evidence (Record document and page # for future reference)   | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|---|--|---|
| <p>The State has documented adequate validity evidence that the State’s assessment scores are related as expected with other variables.</p>   | <p>Arizona submitted the following evidence:<br/> <b>CORRELATION BETWEEN AZELLA AND AZMERIT ELA OR MATH</b><br/>                     AZ 1300 AZELLA 2018 Technical Report</p> <ul style="list-style-type: none"> <li>• Chapter 10-Section 10.2.4 - Correlation between AZELLA and AzMERIT ELA or Math pp. 79-80</li> <li>• Appendix F. AZELLA REASSESSMENT</li> </ul> <p><b>RESULTS IN RELATION TO AZMERIT RESULTS</b> pp. 341-358<br/>                     AZ 1423 AZELLA Evaluation of Overall Proficient Cut Report<br/>                     AZ 1424 AZELLA OCR-DOJ Fully Executed Agreement 5-2-16<br/>                     AZ 1425 AZELLA OCR-DOJ Fully Executed Agreement Amended 6-17-16<br/>                     AZ 1426 AZELLA OCR-DOJ Fully Executed Agreement 6-17-16 Email<br/>                     AZ 1427 AZELLA 2012-2013 Technical Report • Chapter 8-Section 8.4 COHERENCE<br/> <b>BETWEEN AZELLA PLACEMENT AND SUMMATIVE ASSESSMENTS</b> pp. 97-98</p> | <p>Several peers indicated the evidence provided by the State seems to support the inference that the AZELLA assessment results are not as related to other variables as expected. See AZ 1300, Table 10.5 on page 83.</p> <p>Table 10.5 shows that the percentage of students who passed AZELLA but did not AzMERIT is relatively high compared to students who passed both.</p> <p>Should the State revise its ELP standards in response to Critical Element 1.2, the evidence for this critical element will need to be revised.</p> |
| <p><b>Section 3.4 Summary Statement</b></p>   |  |   |
| <p><u>X</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>• Evidence that the State has taken steps to improve validity based on relations to other variables and evidence that those steps have sufficiently improved validity based on relations to other variables.</li> </ul> |  |   |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona

SECTION 4: TECHNICAL QUALITY – OTHER

**Critical Element 4.1 – Reliability**

| Critical Element   | Evidence (Record document and page # for future reference)   | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence   |
|--|--|--|
| <p>The State has documented adequate reliability evidence for its assessments for the following measures of reliability for the State’s student population overall and each student group consistent with nationally recognized professional and technical testing standards. If the State’s assessments are implemented in multiple States, measures of reliability for the assessment overall and each student group consistent with nationally recognized professional and technical testing standards, including:</p> <ul style="list-style-type: none"> <li>• Test reliability of the State’s assessments estimated for its student population (<i>for ELP assessments, including any domain or component sub-tests, as applicable</i>);</li> <li>• Overall and conditional standard error of measurement of the State’s assessments, including any domain or component sub-tests, as applicable;</li> <li>• Consistency and accuracy of estimates in categorical classification decisions for the cut scores, achievement levels or proficiency levels based on the assessment results;</li> <li>• For computer-adaptive tests, evidence that the assessments produce test forms with adequately precise estimates of <i>an EL’s English proficiency</i>.</li> </ul> | <p>Arizona submitted the following evidence:<br/>AZ 1300 AZELLA 2018 Technical Report</p> <ul style="list-style-type: none"> <li>• Chapter 10 -Section 10.1.1 – Measures of Internal Consistency pp. 70-73; standard error of measurement in Table 10.1 p. 71; and Tables E.1-E.99 pp. 295-336</li> <li>• Chapter 11-Section 11.2 - Classification consistency and accuracy in Tables 11.4-11.12 pp. 104-116</li> <li>• Chapter 11-Section 11.2 - Conditional standard error of measurement in Table 11.3 p. 99; Tables C.131-C163 pp. 209-277; and Figures B.12.- B.16 pp. 155-158</li> </ul> | <p>Overall test score reliability and CSEM are adequate. Classification consistency—appear to be adequate for the most part.</p> <p>Should the State revise its ELP standards in response to Critical Element 1.2, the evidence for this critical element will need to be revised.</p> |
| <p><b>Section 4.1 Summary Statement</b></p>  |  |  |
| <p><input checked="" type="checkbox"/> No additional evidence is required</p>  |  |  |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

| Critical Element | Evidence (Record document and page # for future reference) | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence |
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**Critical Element 4.2 – Fairness and Accessibility**

| Critical Element   | Evidence (Record document and page # for future reference)  | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|--|---|---|
| <p><i>For all State ELP assessments,</i> assessments should be developed, to the extent practicable, using the principles of universal design for learning (UDL) (see definition<sup>2</sup>).</p> <p><i>For ELP assessments,</i> the State has taken reasonable and appropriate steps to ensure that its assessments are accessible to all EL students and fair across student groups, including ELs with disabilities, in their design, development, and analysis.</p> | <p>Arizona submitted the following evidence:<br/>AZ 1300 AZELLA 2018 Technical Report</p> <ul style="list-style-type: none"> <li>• Chapter 2-Involvement of Arizona Educators at all levels pp. 3-4</li> <li>• Chapter 3-Section 3.2; Item Specifications p. 5</li> </ul> <p>AZ 1428 AZELLA Indian Education Update<br/>• p. 5 Bias Meeting<br/>AZ 1429 AZELLA Native American Bias Issues Materials and Email<br/><b>COMMITTEE MATERIALS</b><br/>AZ 1350 AZELLA DOK chart<br/>AZ 1432 AZELLA Improving Item Quality<br/>AZ 1433 AZELLA Language Demands-Complexity<br/>AZ 1434 AZELLA Taboo List<br/>AZ 1435 AZELLA Traditional Navajo Taboos<br/><b>SAMPLE TESTS</b><br/>AZ 1436 AZELLA Stage I Sample Test Book<br/>AZ 1437 AZELLA Stage I Teacher’s Edition</p> | <p>Design—standards, as written, do not reflect that UDL was utilized in the standards development process. For example, some writing standards focus on legibility without allowing for alternative response modes such as typing.</p> <p>In the design of the assessment some aspects of UDL are referenced in item writing training and in bias/sensitivity review. There does not appear to be evidence of attending to multiple means of presentation in these references. For example, Braille or text-to-speech are not mentioned in item writing UDL principles. These are discussed in accommodations in limited ways.</p> <p>Listening and Speaking are combined in the design of the assessment which means that if a student can’t do one, they can’t do both. The documentation is unclear in describing how students who can’t take one portion might access taking another portion.</p> <p>Development—Native American cultural issues are addressed in passage and item development. Held educator review committees for bias and fairness.</p> <p>Analysis</p> |

<sup>2</sup> see page 28 of “*A State’s Guide to the U.S. Department of Education’s Assessment Peer Review Process*”, September 24, 2018 available at: [www.ed.gov/admins/lead/account/saa.html](http://www.ed.gov/admins/lead/account/saa.html)

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

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|   |  | <p>DIF analysis is conducted on items specific to groups of interest. Appendix G details.</p> <p>Evidence is not provided that the AZELLA is accessible to Braille readers. In the Accommodations Guidelines (AZ 1318) it looks as if Braille is allowable, however, it is not clear if Braille forms are provided by the ADE.</p> <p>Should the State revise its ELP standards in response to Critical Element 1.2, the evidence for this critical element will need to be revised.</p> |
| <p><b>Section 4.2 Summary Statement</b></p>   |  |  |
| <p><u>X</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>• Additional evidence of how the assessment is developed, to the extent practicable, using the principles of universal design for learning (UDL) (see definition<sup>3</sup>). For example, multiple means of response and multiple means of presentation should be included in the design of the assessment. Evidence the state is incorporating the aforementioned principles of UDL into development.</li> </ul> |  |  |

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<sup>3</sup> see page 28 of “*A State’s Guide to the U.S. Department of Education’s Assessment Peer Review Process*”, September 24, 2018 available at: [www.ed.gov/admins/lead/account/saa.html](http://www.ed.gov/admins/lead/account/saa.html)

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 4.3 – Full Performance Continuum**

| Critical Element   | Evidence (Record document and page # for future reference)  | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|--|---|---|
| <p>The State has ensured that each assessment provides an adequately precise estimate of student performance across the full performance continuum for <i>ELP assessments</i>, including performance for EL students with high and low levels of English language proficiency and with different proficiency profiles across the domains of speaking, listening, reading, and writing.</p> | <p>Arizona submitted the following evidence:<br/> <b>DISTRIBUTION OF LINGUISTIC COMPLEXITY</b><br/>                     AZ 1300 AZELLA 2018 Technical Report<br/>                     • Chapter 8-Section 8.3 pp. 53-55<br/>                     Appendix B pp. 141-164; and Figures B.1 - B.11 pp. 155-158<br/> <b>TIF ANALYSIS AND TABLE OF CONDITIONAL STANDARD ERRORS OF MEASUREMENT</b><br/>                     AZ 1300 AZELLA 2018 Technical Report</p> <ul style="list-style-type: none"> <li>• Chapter 8-Section 8.3 pp. 53-55</li> <li>• Appendix B pp. 141-164; Figures B.12-B.16 pp. 155-158</li> <li>• Table 11.3 pp. 99-103</li> <li>• Table C.131-C.164 pp. 209-277</li> </ul> | <p>Table 8.1. IRT Statistics Summary for the Spring AZELLA Reassessments provides Mean Vertical Rasch. Stage II and Stage III Speaking Mean Vertical Rasch are concerning compared to the other domains within the stage and across the vertical stages. (page 54)<br/>                     Pages 149 – 154, Item Person Maps<br/>                     Figures B.1 – B.11 illustrate the adequacy in precisely estimating student performance across the full performance continuum for <i>ELP assessments</i>. This adequacy varies by Stage and Domain.<br/>                     For example, Stage I Speaking, Reading and Writing have only 1 to 2 items at the lowest theta levels and only a few in the upper end of the theta scale. Most items are clustered around the Intermediate Cut.<br/>                     In Stage II, very few Writing items are below the Intermediate Cut making it difficult to precisely estimate student performance in the lower levels. Reading has few items above the Proficient Cut. Speaking has few items in general in Stage II and these are clustered at or below the Intermediate and Basic Cuts.<br/>                     The spread of items in Stages III -V there are few items to estimate student performance above the Proficient Cut or Below the Basic Cut. This is most extreme at the higher Thetas for Stage IV and V.<br/>                     Earlier evidence from the State indicates item development for the upper end of linguistic complexity is a target of item writing.<br/>                     In terms of assessment of all students, this is particularly important for students with significant cognitive disabilities. State should show evidence of progress toward development of an alternate assessment for these students or evidence of measurement that differentiates linguistic complexity at the lower end of English language proficiency.</p> |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

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|   |  | Should the State revise its ELP standards in response to Critical Element 1.2, the evidence for this critical element will need to be revised. |
| <b>Section 4.3 Summary Statement</b>  |  |  |
| <p><u>X</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>• Evidence the State has improved the precision of measurement for students at the highest levels of linguistic complexity where the intent is to signal different instructional responses based on the students’ measurement within the performance indicators at the higher levels.</li> <li>• Evidence that the State has improved the precision of measurement for students at lowest levels (pre-emergent, emergent, basic) where the intent is to signal different instructional responses based on the students’ measurement within the performance indicators at these levels.</li> <li>• Evidence of more precise measurement of ELs with significant cognitive disabilities. For example, evidence of the implementation of an alternate assessment for ELs with significant cognitive disabilities or evidence of measurement that differentiates linguistic complexity at the lower end of English language proficiency.</li> </ul> |  |  |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona

**Critical Element 4.4 – Scoring**

| Critical Element  | Evidence (Record document and page # for future reference)  | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence   |
|---|---|--|
| <p>The State has established and documented standardized scoring procedures and protocols for its assessments (and <i>for ELP assessments, any applicable domain or component sub-tests</i>) that are designed to produce reliable and meaningful results, facilitate valid score interpretations, and report assessment results in terms of the State’s <i>ELP standards</i>.</p> <p><i>For ELP assessments</i>, if an English learner has a disability that precludes assessment of the student in one or more of the required domains/components (listening, speaking, reading, and writing) such that there are no appropriate accommodations for the affected domain(s)/component(s), the State must provide a description of how it will ensure that the student is assessed in the remaining domain(s)/component(s) in which it is possible to assess the student, and a description of how this will occur.<sup>4</sup></p> | <p>Arizona submitted the following evidence:<br/>AZ 1300 AZELLA 2018 Technical Report</p> <ul style="list-style-type: none"> <li>• Chapter 8-Section 8.4 – Equating pp. 55-58</li> <li>• Chapter 8-Section 8.5 – Scaling p. 58</li> <li>• Chapter 6-Scoring of Open-Ended Items pp. 28-44</li> <li>• Chapter 10-Section 10.1.2 – Interrater Reliability p. 74</li> </ul> <p>AZ 1438 AZELLA 2012 Rubric Development Narrative<br/>AZ 1439 AZELLA IEA Scoring Presentation<br/><b>ELs WITH DISABILITY</b><br/>AZ 1440 AZELLA Guidance for Students who are <b>Deaf-and-or Blind</b><br/>AZ 1320 AZELLA Guidance for Students with an EL Need and a SPED Need<br/>AZ 1441 AZELLA- Internal Procedures 2019 pp. 69-82<br/>AZ 1442 AZELLA TAC June 2018 Agenda • p.3<br/>AZ 1443 AZELLA TAC June 2018 Meeting Notes • p. 9-10<br/>AZ 1444 AZELLA TAC March 2019 Meeting Agenda • p.2</p> | <p>Three concerns were expressed by the peer reviewers in regard to the automated scoring used for AZELLA.</p> <p><b>Reliable and Meaningful:</b><br/>In regard to automated scoring, the state has set an adequate bar in the technical report; e.g., AZ 1300. Section 6.3.1.5 cites Williamson, Xi, &amp; Bejar, 2012, for their research and training data set. Evidence is needed that these technical standards are met with the operational test data. This also applies to evidence of fairness in automated scoring systems across subgroups for all complexity levels. For example, demonstrate comparable reliability for relevant subgroups such as Native American/non-Native American, Hispanic/not Hispanic, and students with and without disabilities.</p> <p>In the scoring of human-human inter-rater agreement on the writing:<br/>Interrater Agreement—Standard used for human scoring inter-rater agreement is 65%. Table 6.7 –averages are &gt;=65%. However, 65% is a low bar for inter-rater agreement in scoring writing and this is the bar used to train and calibrate the machine scoring as sufficient agreement.<br/>Page 75 AZ 1300 –see concerns above and the reported mean Kappa’s for Stages II and III Speaking domain, for example.</p> <p><b>Valid Score Interpretations:</b><br/>The automatic scoring system used for scoring the Speaking test raises serious concerns regarding construct validity. The types of tasks (e.g., repetition, oral reading), created may have little relevance to the kind of speaking a</p> |

<sup>4</sup> See full reference in regulation, 34 CFR § 200.6(h)(4)(ii) (online at [https://www.ecfr.gov/cgi-bin/text-idx?SID=07e168e9e7a6c5931b4549cc15547ee9&mc=true&node=se34.1.200\\_16&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=07e168e9e7a6c5931b4549cc15547ee9&mc=true&node=se34.1.200_16&rgn=div8) )

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

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|  |  | <p>student might be expected to produce in a content classroom and the responses are rated based on fine-grained features of the student response (e.g., expected words and phrases, accurate pronunciation based on native speaker models) rather than the overall meaning and complexity of the response conveyed by the speaker.</p> <p>TAC Meeting Notes (AZ 1443) indicate recommendations for the State to calculate scores for overall proficiency in the event that not all domains are taken. This description is in the form of a suggestion from TAC. AZ1320 is not sufficient in description of how it will ensure students are assessed in remaining domains or how it will occur.</p> <p>Document AZ 1441 provides some evidence that the state has in place procedures to ensure the inclusion of students with disabilities even if the disability precludes assessment of one or more domains. However, this document also seems to imply that all deaf students would not receive the speaking assessment. It is unclear if this is due to the task design or an assumption that all deaf students are non-verbal.</p> <p>Evidence document AZ 1411 includes procedures for excluding students with significant cognitive disabilities. This should be updated when an alternate ELP is released.</p> <p>Peer reviewers expressed concern about the information presented on page 69 of AZ 1441. The text on this page indicates that ELs with disabilities should be compared to English only peers with the same disability. This text does not consider severity of disability, whether English language skills are sufficient for academic instruction, or evidence the IEP teams know how to determine whether a student has English language skills comparable to students with low incidence disabilities.</p> <p>In reporting the scores, the State should report the confidence interval associated with the reported scores,</p> |
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Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

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|  |  | <p>particularly for the domain scores which have fewer items. The interpretation guides should address the use of confidence intervals in interpreting and using the scores for student and school level decision making.</p> <p>Should the State revise its ELP standards in response to Critical Element 1.2, the evidence for this critical element will need to be revised.</p> |
| <p><b>Section 4.4 Summary Statement</b></p>  |  |   |
| <p><u>X</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>• Evidence that the standardized scoring procedures produce reliable and meaningful results and facilitate valid score interpretations for all subgroups. For example, demonstrate comparable reliability for relevant subgroups such as Native American/non-Native American, Hispanic/not Hispanic, students with and without disabilities.</li> <li>• Evidence of how the State will ensure that students with disabilities that are not able to be assessed in one or more domains are assessed in the remaining domain(s)/component(s) in which it is possible to assess the student, and a description of how this will occur and be scored.</li> <li>• Evidence of the inclusion of confidence interval information on score reports and report interpretation manuals.</li> </ul> |  |   |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 4.5 – Multiple Assessment Forms**

| <b>Critical Element</b>  | <b>Evidence (Record document and page # for future reference)</b>  | <b>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</b>   |
|--|--|---|
| <p>If the State administers multiple forms of <i>ELP assessments</i> within or across grade-spans, ELP levels, or school years, the State ensures that all forms adequately represent the State’s <i>ELP standards</i> and yield consistent score interpretations such that the forms are comparable within and across settings.</p> | <p>Arizona submitted the following evidence:<br/>                     AZ 1300 AZELLA 2018 Technical Report<br/>                     • Chapter 8-Section 8.4 – Equating pp. 55-58</p> | <p>Equating of forms based on NEAT design is acceptable equating method. Note the TAC raised concerns about the constrained anchor set in the mode comparability study so Pearson has relaxed those constraints to some degree. This information was shared in TAC meeting notes.</p> <p>Should the State revise its ELP standards in response to Critical Element 1.2, the evidence for this critical element will need to be revised.</p> |
| <p><b>Section 4.5 Summary Statement</b></p>  |  |   |
| <p><input checked="" type="checkbox"/> No additional evidence is required</p>  |  |   |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 4.6 – Multiple Versions of an Assessment**

| <b>Critical Element</b>   | <b>Evidence (Record document and page # for future reference)</b>  | <b>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</b>  |
|---|--|--|
| <p>If the State administers any of its assessments in multiple versions within a subject area (e.g., online versus paper-based delivery), grade level, or school year, the State:</p> <ul style="list-style-type: none"> <li>• Followed a design and development process to support comparable interpretations of results for students tested across the versions of the assessments;</li> <li>• Documented adequate evidence of comparability of the meaning and interpretations of the assessment results.</li> </ul> | <p>Arizona submitted the following evidence:<br/>                     AZ 1445 AZELLA Mode Comparability Study<br/>                     AZ 1446 AZELLA TAC Agenda 2-2-16<br/>                     AZ 1447 AZELLA TAC Comparability Memo</p> | <p>The quantitative method used for the mode comparability study may not be the most desirable, but given the real-world constraints regarding double-testing, it's acceptable. However, it would be helpful to know if any qualitative studies were conducted to ensure that students were able to interact successfully with the computer-based test.</p> <p>Comparability study and memo provide adequate evidence. TAC recommends no reset of proficiency cuts due to lack of mode effect.</p> <p>Should the State revise its ELP standards in response to Critical Element 1.2, the evidence for this critical element will need to be revised.</p> |
| <p><b>Section 4.6 Summary Statement</b></p>   |  |  |
| <p><input checked="" type="checkbox"/> No additional evidence is required</p>   |  |  |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 4.7 – Technical Analysis and Ongoing Maintenance**

| <b>Critical Element</b>   | <b>Evidence (Record document and page # for future reference)</b>  | <b>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</b>  |
|---|--|--|
| <p>The State:</p> <ul style="list-style-type: none"> <li>• Has a system for monitoring, maintaining, and improving, as needed, the quality of its assessment system, including clear and technically sound criteria for the analyses of all of the assessments in its assessment system (i.e., general assessments and alternate assessments), and</li> <li>• Evidence of adequate technical quality is made public, including on the State’s website.</li> </ul> | <p>Arizona submitted the following evidence:<br/>                     AZ 1448 AZELLA Website – Technical and Legal Resources<br/>                     AZ 1449 AZELLA Timeline with Standards for 2020<br/>                     AZ 1359 AZELLA Development Cycle<br/>                     AZ 1442 AZELLA TAC June 2018 Agenda • p.2</p> | <p>Technical manual serves as major source of evidence for ongoing monitoring, maintenance, and improvement of the system. It is not cited in the evidence by the State. Public access to the technical manuals, or a limited public version, increases transparency and accountability for the assessment process, program and its results.</p> <p>The system in place for monitoring, maintaining, and improving, as needed, the quality of the assessment system is in place. Public facing documents that summarize and provide a coherent description of the system would enhance transparency of the process for stakeholders.</p> |
| <p><b>Section 4.7 Summary Statement</b></p>   |  |  |
| <p><input checked="" type="checkbox"/> No additional evidence is required</p>   |  |  |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona

SECTION 5: INCLUSION OF ALL STUDENTS

Critical Element 5.1 – Procedures for Including Students with Disabilities

| Critical Element   | Evidence (Record document and page # for future reference)   | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|--|--|---|
| <p>The State has in place procedures to ensure the inclusion of all public elementary and secondary school students<sup>5</sup> with disabilities in the State’s assessment system. Decisions about how to assess students with disabilities must be made by a student’s IEP Team under IDEA, the placement team under Section 504, or the individual or team designated by a district to make that decision under Title II of the ADA, as applicable, based on each student’s individual abilities and needs.</p> <ul style="list-style-type: none"> <li>• <b>For ELP assessments</b>, policies that require the inclusion of an EL with a disability that precludes assessment of the student in one or more of the required domains (speaking, listening, reading, and writing) such that there are no appropriate accommodations for the affected component (the State must assess the student’s English language proficiency based on the remaining components in which it is possible to assess the student).</li> </ul> | <p>Arizona submitted the following evidence:<br/>           AZ 1441 AZELLA-Internal Procedures 2019 • pp. 69-82<br/>           AZ 1376 AZELLA 2018 Test Coordinator Manual • p.6<br/>           AZ1321 AZELLA 2018 Test Administration Directions Stage III 2018 Reassessment • p.9<br/>           AZ 1451 AZELLA Testing Guidance for EL-SPED Students<br/>           AZ 1318 AZELLA 2018 Accommodation Guidelines Manual pp. 29-30<br/>           AZ 1450 AZELLA Identifying and Supporting ELs with Disabilities • pp. 14-18<br/>           AZ 1328 AZELLA Navigating Reports • pp. 20-23<br/>           EL 70 Report</p> | <p>Document AZ 1441 provides some evidence that the state has in place procedures to ensure the inclusion of students with disabilities even if the disability precludes assessment of one or more domains. However, this document also seems to imply that all deaf students would not receive the speaking assessment. It is unclear if this is due to the task design or an assumption that all deaf students are non-verbal.</p> <p>Greater clarity is needed in document AZ 1318 in providing guidance to IEP teams between accommodations and universal testing tools. For example, the document states that extended time is a type of timing accommodation but later refers to it as a universal testing tool.</p> <p>The limited number of accommodations requires a better justification for use because it may result in IEP teams excluding some students unnecessarily. Include justification for why some accommodations are permitted in some domains but not others (e.g., extended time on speaking is not allowed/not applicable but an allowable accommodation for listening, reading, and writing) and a reasonable rationale for why some accommodations are not provided (e.g., Braille).</p> <p>Evidence document AZ 1441 includes procedures for excluding students with significant cognitive disabilities. This should be updated when an alternate ELP is released.</p> <p>Peer reviewers expressed concern about the information presented on page 69 of AZ 1441. The text on this page indicates that ELs with disabilities should be compared to English only peers with the same disability. This text does not consider severity of disability,</p> |

<sup>5</sup> For ELP peer review, this refers to ELs with disabilities.

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

| <b>Critical Element</b>  | <b>Evidence (Record document and page # for future reference)</b> | <b>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</b>  |
|--|---|--|
|  |   | whether English language skills are sufficient for academic instruction, or evidence the IEP teams know how to determine whether a student has English language skills comparable to students with low incidence disabilities. |
| <b>Section 5.1 Summary Statement</b>   |   |  |
| <p><u>X</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>Evidence of State policies that require the inclusion of an EL with a disability that precludes assessment of the student in one or more of the required domains (speaking, listening, reading, and writing).</li> </ul> |   |  |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 5.2 – DOES NOT APPLY to ELP Assessment Peer Review**

| Critical Element   | Evidence (Record document and page # for future reference) | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence |
|--|--|--|
| <ul style="list-style-type: none"> <li>Note: This critical element does not apply to ELP assessments, as the requirements only apply to the inclusion of ELs in <b>academic assessments</b>.</li> </ul>                                  | n/a  | n/a  |
| <b>Section 5.2 Summary Statement</b>   |  |  |
| <p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>• [list additional evidence needed w/brief rationale]</li> </ul> |  |  |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

## STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona

### Critical Element 5.3 – Accommodations

| Critical Element  | Evidence (Record document and page # for future reference)  | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence   |
|---|---|--|
| <p>The State makes available appropriate accommodations and ensures that its assessments are accessible to students with disabilities and ELs, including ELs with disabilities. Specifically, the State:</p> <ul style="list-style-type: none"> <li>Ensures that appropriate accommodations are available for ELs;</li> <li>Has determined that the accommodations it provides (1) are appropriate and effective for meeting the individual student’s need(s) to participate in the assessments, (2) do not alter the construct being assessed, and (3) allow meaningful interpretations of results and comparison of scores for students who need and receive accommodations and students who do not need and do not receive accommodations;</li> <li>Has a process to individually review and allow exceptional requests for a small number of students who require accommodations beyond those routinely allowed.</li> <li>Ensures that accommodations for all required assessments do not deny students with disabilities or ELs the opportunity to participate in the assessment and any benefits from participation in the assessment.</li> </ul> | <p>Arizona submitted the following evidence:<br/>AZ 1300 AZELLA 2018 Technical Report</p> <ul style="list-style-type: none"> <li>Table 9.3 Frequency of Accommodations p. 66</li> <li>Appendix C, Table C.131: Reassessment Test Results by Accommodation pp. 209-211</li> </ul> <p>AZ 1376 AZELLA 2018 Test Coordinator Manual • p.6<br/>AZ1321 AZELLA 2018 Test Administration Directions Stage III 2018 Reassessment • p.9<br/>AZ 1318 AZELLA 2018 Accommodation Guidelines Manual • pp. 29-30<br/>AZ 1452 AZELLA Buros Fairness Webinar_Kettler<br/>AZ 1453 AZELLA Welch Response to Fairness webinar question<br/>AZ 1442 AZELLA June 2018 TAC Meeting Agenda • p.2<br/>AZ 1443 AZELLA June 2018 TAC Meeting Notes p 3</p> | <p>Some evidence indicated appropriate accommodations are not available. For example, AZ 1441 (Internal Procedures) indicates on page 70 that “A braille version of the AZELLA is not available now” but no reason why braille would alter the reading, writing, speaking, or listening construct. AZ 1451 provides guidance on why some accommodations (spell check, grammar check) are not appropriate based on the construct as defined in the standards). However, this resurfaced some concerns that the Critical Element 1.2 (ELP Standards) have an over reliance on grammar and ELA-like standards rather than ELP standard. ·</p> <p>AZ 1452 (Buros Fairness Webinar) provides a framework for making accommodations decisions but no evidence these studies or decisions model were used.</p> <p>There is a process in place for individual review—it is in the documents provided that provide contact information for individual review. The internal document indicates a process for individual exceptions; however, the concerns expressed about the information in AZ 1441 apply here as well.</p> |
| <p><b>Section 5.3 Summary Statement</b></p>   |   |  |
| <p><u>X</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>Evidence the State ensures that appropriate accommodations are available for ELs.</li> <li>Evidence the State has determined that the accommodations it provides 1) are appropriate and effective for meeting the individual student’s need(s) to participate in the assessments, (2) do not alter the construct being assessed, (3) allow meaningful interpretations of results and comparison of scores for students who need and receive accommodations and students who do not need and do not receive accommodations.</li> </ul>   |   |  |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 5.4 – Monitoring Test Administration for Special Populations**

| Critical Element  | Evidence (Record document and page # for future reference)  | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|---|---|---|
| <p>The State monitors test administration in its districts and schools to ensure that appropriate assessments, with or without accommodations, are selected for all students with disabilities and ELs so that they are appropriately included in assessments and receive accommodations that are:</p> <ul style="list-style-type: none"> <li>• Consistent with the State’s policies for accommodations;</li> <li>• Appropriate for addressing a student’s disability or language needs for each assessment administered;</li> <li>• Consistent with accommodations provided to the students during instruction and/or practice;</li> <li>• Consistent with the assessment accommodations identified by a student’s IEP Team under IDEA, placement team convened under Section 504; or for students covered by Title II of the ADA, the individual or team designated by a district to make these decisions; or another process for an EL;</li> <li>• Administered with fidelity to test administration procedures;</li> <li>• Monitored for administrations of all required ELP assessments, and AELPA.</li> </ul> | <p>Arizona submitted the following evidence:</p> <p>AZ 1451 AZELLA Testing Guidance for EL-SPED Students • p.1</p> <p>AZ 1450 AZELLA Identifying and Supporting Els with Disabilities • pp. 14-18</p> <p>AZ 1476 AZELLA DTC Important Tasks Checklist • p.6</p> <p>AZ 1376 AZELLA 2018 Test Coordinator Manual • p. 3, pp. 20-22, p. 25 and p. 32</p> <p>AZ 1388 AZELLA Monitoring Training Notes AZ 1392 AZELLA 2018 Observation Protocol AZ 1395 AZELLA 2018 Assessment Observation Presentation</p> <ul style="list-style-type: none"> <li>• Slides 1 and 2</li> </ul> | <p>Documents 1388, 1392, and 1395 indicate plans to conduct monitoring. However additional evidence is needed that monitoring occurred. Evidence is needed that accommodations were administered: consistent with the state’s policies for accommodations, appropriate for the student’s needs, consistent with instructional accommodations, consistent with the students’ IEPs, and administered with fidelity.</p> |
| <p><b>Section 5.4 Summary Statement</b></p>   |   |   |
| <p><u>X</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>• Evidence that monitoring occurred.</li> <li>• Evidence that the accommodations were administered: consistent with the state’s policies for accommodations, appropriate for the student’s needs, consistent with instructional accommodations, consistent with the students’ IEPs, and with fidelity.</li> </ul>   |   |   |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**SECTION 6: ELP ACHIEVEMENT STANDARDS AND REPORTING**

**Critical Element 6.1 – State Adoption of ELP Achievement Standards for All Students**

| Critical Element  | Evidence (Record document and page # for future reference)  | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|---|---|---|
| <p><b>For ELP standards:</b></p> <ul style="list-style-type: none"> <li>• The State adopted ELP achievement standards that address the different proficiency levels of ELs;</li> <li>• If the State has developed alternate ELP achievement standards, it has adopted them only for ELs who are students with the most significant cognitive disabilities who cannot participate in the regular ELP assessment even with appropriate accommodations.</li> </ul> | <p>Arizona submitted the following evidence:<br/>                     AZ 1314 AZELLA ARS 15-756 – Identification of English language learners • Section A<br/>                     AZ 1454 AZELLA Approval of the final cut scores<br/>                     AZ 1455 AZELLA Scaling Constants Calculated</p> | <p>Should the State revise its ELP standards in response to Critical Element 1.2, the evidence for this critical element will need to be revised.</p> |
| <p><b>Section 6.1 Summary Statement</b></p>   |   |   |
| <p><input checked="" type="checkbox"/> No additional evidence is required</p>   |   |   |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 6.2 – ELP Achievement Standards Setting**

| Critical Element   | Evidence (Record document and page # for future reference)   | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence   |
|--|--|--|
| <p>The State used a technically sound method and process that involved panelists with appropriate experience and expertise for setting:</p> <ul style="list-style-type: none"> <li>• <b>ELP achievement standards and, as applicable, alternate ELP achievement standards</b>, such that:               <ul style="list-style-type: none"> <li>○ Cut scores are developed for every grade/grade band, content domain/language domain, and/or composite for which proficiency-level scores are reported.</li> </ul> </li> </ul> | <p>Arizona submitted the following evidence:</p> <p><b>2013 STANDARD SETTING</b></p> <p>AZ 1456 AZELLA Standard Setting Report August 2013</p> <p>AZ 1457 AZELLA Standard Setting Agenda</p> <p>AZ 1458 AZELLA Standard Setting Bookmark Training</p> <p>AZ 1459 AZELLA Standard Setting Opening Session</p> <p>AZ 1460 AZELLA Standard Setting Panelist Info Survey</p> <p>AZ 1461 AZELLA Evaluation of Overall Proficiency Levels</p> <p>AZ 1462 AZELLA Committee Demographics</p> <p>AZ 1463 AZELLA Sign-in Sheets May 6-8</p> <p><b>2016 STANDARD SETTING REVISION</b></p> <p>AZ 1323 AZELLA OCR-DOJ Executed Resolution Agreement 8-31-12</p> <p>AZ 1420 AZELLA OCR-DOJ Fully Executed Agreement 5-2-16</p> <p>AZ 1421 AZELLA OCR-DOJ Fully Executed Agreement Amended 6-17-16</p> <p>AZ 1422 AZELLA OCR-DOJ Full Executed Agreement 6-17-16 Email</p> <p>AZ 1324 AZELLA OCR-DOJ Closure Letter Final</p> | <p>The method used for standard setting was technically sound and appropriate given the year of the standard setting (2013).</p> <p>It is a little concerning that panelists were unwilling to adjust their results when presented with evidence that they were not vertically articulated. More concerning, though, is the impact data that shows that students who pass AZELLA do not perform as well as their never-EL peers, especially at the higher grade levels. Once again, this seems to be a result of the standards not reflecting ELP.</p> <p>Should the State revise its ELP standards in response to Critical Element 1.2, the evidence for this critical element will need to be revised.</p> |
| <p><b>Section 6.2 Summary Statement</b></p>  |  |  |
| <p><input checked="" type="checkbox"/> No additional evidence is required</p>  |  |  |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

**STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona**

**Critical Element 6.3 –Aligned ELP Achievement Standards**

| Critical Element  | Evidence (Record document and page # for future reference)   | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|---|--|---|
| <p><b>For ELP achievement standards:</b><br/>The State has ensured that ELP assessment results are expressed in terms that are clearly aligned with the State’s ELP standards, and its ELP performance-level descriptors.</p> <p>If the State has adopted alternate ELP achievement standards for ELs who are students with the most significant cognitive disabilities, the alternate ELP achievement standards should be linked to the State’s grade-level/grade-band ELP standards and should reflect professional judgment of the highest ELP achievement standards possible for ELs who are students with the most significant cognitive disabilities.</p> | <p>Arizona submitted the following evidence:<br/>AZ 1464 AZELLA Standard Setting June 2013 Data Analysis<br/>AZ 1465 AZELLA Stage I PLDs<br/>AZ 1466 AZELLA Stage II PLDs<br/>AZ 1467 AZELLA Stage III PLDs<br/>AZ 1468 AZELLA Stage IV PLDs<br/>AZ 1469 AZELLA Stage V PLDs<br/>AZ 1470 AZELLA PLD Expert Bios<br/>AZ 1471 AZELLA Refinement of Performance Level Descriptors for the AZELLA Training Overview<br/>AZ 1472 AZELLA PLD Committee Bios<br/>AZ 1473 AZELLA PLD Sign-in Sheets Feb 24<br/>AZ 1474 AZELLA PLD Sign-in Sheets Oct 11-12</p> | <p>AZ 1300, page 11, indicates the proficient cut was reset in 2016 (AZ 1424 -1426).<br/>Pages 79 and 80 indicate a regression discontinuity analysis was conducted to check the proficiency cuts that came out of the standard setting. The authors of the analysis concluded the 2013 standard setting was upheld by the regression discontinuity study results. AZ 1424-1426 indicate the State changed the proficient cut in response to DOJ-OCR negotiated agreement in 2016.</p> <p>How do the changes in Proficiency cut scores impact the alignment to the 2013 PLDs submitted as evidence for the Stages?</p> <p>Also, the assessment results are linked to the ELP PLDs and Standards—this is subject to same concerns as outlined in Critical Element 1.2. Peers observed that the PLD Experts were primarily listed with expertise in English Language Arts rather than ELP. PLD committee members are missing expertise in ELs with disabilities, non-EL students with disabilities, and expertise in UDL.<br/>Should the state revise the PLDs in the future, the peers recommend that personnel with expertise in ELs with disabilities, non-EL students with disabilities, and expertise UDL.</p> <p>Should the State revise its ELP standards in response to Critical Element 1.2, the evidence for this critical element will need to be revised.</p> |
| <p><b>Section 6.3 Summary Statement</b></p>   |  |   |
| <p><u>X</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>Evidence that ELP assessment results expressed in terms of the 2016 proficient cut changes for Stages III – V are clearly aligned with the State’s ELP performance-level descriptors for those Stages.</li> </ul>   |  |   |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona

**Critical Element 6.4 – Reporting**

| Critical Element   | Evidence (Record document and page # for future reference)   | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|--|--|---|
| <p>The State reports its assessment results for all students assessed, and the reporting facilitates timely, appropriate, credible, and defensible interpretations and uses of those results by parents, educators, State officials, policymakers and other stakeholders, and the public.</p> <p>The State reports to the public its assessment results on <i>English language proficiency for all ELs including the number and percentage of ELs attaining ELP</i>.</p> <p>For the <i>ELP assessment</i>, the State provides coherent and timely information about each student’s attainment of the State’s ELP standards to parents that:</p> <ul style="list-style-type: none"> <li>• Reports the <i>ELs’ English proficiency</i> in terms of the State’s grade level/grade-band ELP standards (including performance-level descriptors);</li> <li>• Are provided in an understandable and uniform format;</li> <li>• Are, to the extent practicable, written in a language that parents and guardians can understand or, if it is not practicable to provide written translations to a parent or guardian with limited English proficiency, are</li> </ul> | <p>Arizona submitted the following evidence:<br/>AZ 1328 AZELLA Navigating Reports</p> <ul style="list-style-type: none"> <li>• Overview for Report Users p. 3</li> <li>• Pearson Reports including Individual Student Report pp. 6-18</li> <li>• ADE Reports (EL 70, EL 73) pp. 19-29</li> <li>• Using AZELLA Reports pp. 30-34</li> </ul> <p>AZ 1475 AZELLA Important Dates<br/>AZ 1325 AZELLA Individual Student Report Back<br/>AZ 1326 AZELLA Roster Report Front<br/>AZ 1327 AZELLA Roster Report Back</p> | <p>The State reports to the public its assessment results on ELP for all ELs including the number and percentage of ELs attaining ELP.</p> <p>State reports its assessment results for all students...timely, appropriate, credible, and defensible interpretations and uses of those results by parents, educators, State officials, policymakers and other stakeholders, and the public.</p> <p>No evidence of public reporting of the # and % of ELs attaining ELP at school, district, and state level.</p> <p>As to ‘coherent and timely information about each student’s attainment’. Evidence was not submitted that demonstrates reporting is provided in a timely manner for use by educators and parents.</p> <p>For the <i>ELP assessment</i>, the State provides coherent and timely information about each student’s attainment of the State’s ELP standards to parents that:</p> <ul style="list-style-type: none"> <li>• Are provided in an understandable and uniform format;</li> <li>• Are, to the extent practicable, written in a language that parents and guardians can understand or, if it is not practicable to provide written translations to a parent or guardian with limited English proficiency, are orally translated for such parent or guardian;</li> <li>• On request by a parent who is an individual with a disability as defined by the ADA, as amended, are provided in an alternative format accessible to that parent.</li> </ul> <p>The student report is intended to support interpretations for parents. It is not clear how results are reported to parents who speak neither English nor Spanish It is not clear that the report is provided upon request in an alternative format accessible to a parent who is an individual with a disability.</p> |

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

## STATE ASSESSMENT PEER REVIEW NOTES FOR Arizona

| Critical Element   | Evidence (Record document and page # for future reference) | Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence  |
|--|--|---|
| <p>orally translated for such parent or guardian;</p> <ul style="list-style-type: none"> <li>• Upon request by a parent who is an individual with a disability as defined by the ADA, as amended, are provided in an alternative format accessible to that parent.</li> </ul>  |  | <p>Among the intended uses and interpretations (AZ1228) of the student report given to parents: ‘Domain scores should be used to discuss strengths and weaknesses in the individual domains of Reading, Writing, Listening, and Speaking.’ Evidence is needed that demonstrates that, to the extent practicable, translation is available in written translation, or in oral translation if written is not practicable.</p> <p>In reporting the scores, the State should report the confidence interval associated with the reported scores, particularly for the domain scores which have fewer items. The interpretation guides should address the use of confidence intervals in interpreting and using the scores for student and school level decision making.</p> <p>Should the State revise its ELP standards in response to Critical Element 1.2, the evidence for this critical element will need to be revised.</p> |
| <p><b>Section 6.4 Summary Statement</b></p>  |  |   |
| <p><u>X</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> <li>• Evidence the State reports results for all students assessed, and the reporting facilitates timely, appropriate, credible, and defensible interpretations and uses of those results by parents, educators, State officials, policymakers and other stakeholders, and the public including evidence the State reports to the public its assessment results on ELP for all ELs including the number and percentage of ELs attaining ELP.</li> <li>• For the <i>ELP assessment</i>, the State provides coherent and timely information about each student’s attainment of the State’s ELP standards to parents that: <ul style="list-style-type: none"> <li>○ Are, to the extent practicable, written in a language that parents and guardians can understand or, if it is not practicable to provide written translations to a parent or guardian with limited English proficiency, are orally translated for such parent or guardian;</li> <li>○ On request by a parent who is an individual with a disability as defined by the ADA, as amended, are provided in an alternative format accessible to that parent.</li> </ul> </li> </ul> |  |   |

### SECTION 7: DOES NOT APPLY TO ELP ASSESSMENT PEER REVIEW

Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.