

United States Department of Education

office of elementary and secondary education

The Honorable Carey M. Wright October 28, 2019

State Superintendent of Education

Mississippi Department of Education

P.O. Box 771

Jackson, MS 39205-0771

Dear Superintendent Wright:

Thank you for your participation in the U.S. Department of Education’s (the Department) 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 Mississippi Department of Education (MDE) to prepare for the English language proficiency (ELP) assessment peer review, which occurred in April 2019. Specifically, MDE submitted evidence regarding the LAS Links.

The ESEA and its implementing regulations require a State to ensure that its local education 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 MDE’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 (LAS Links): **Partially meets the 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 MDE 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 MDE to submit is enclosed with this letter. MDE must submit a plan within 30 days outlining when it will submit all required additional documentation for peer review. Upon submission of the plan, the Department will reach out to determine a mutually agreeable schedule. Resubmission should occur once all necessary evidence is complete (rather than in multiple submissions).

Furthermore, MDE did not submit evidence for an alternate ELP assessment for ELs with significant cognitive disabilities who are unable to take the regular ELP assessment. MDE must provide a plan and timeline for when this required assessment will be submitted for peer review. The Department will be placing a condition on MDE’s Title I, Part A grant award. The condition shall remain until MDE’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.

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.

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 1.3, 4.2, 5.1 and 5.3. Insufficient progress to address such matters may lead OSERS to place a condition on MDE’s fiscal year 2020 IDEA Part B grant award.

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.

Sincerely,

/s/

Frank T. Brogan

Assistant Secretary

for Elementary and Secondary Education

Enclosures

cc: Jackie Sampsell, State Assessment Director

**Critical Elements Where Additional Evidence is Needed to Meet the Requirements for Mississippi’s Use of the LAS Links as an English Language Proficiency (ELP) Assessment**

| **Critical Element** | **Additional Evidence Needed** |
| --- | --- |
| **1.1 – State Adoption of ELP Standards for All English Learners** | For the State’s assessment system:   * Evidence that the State formally adopted K-12 ELP standards for all ELs in public schools in the State. |
| **1.2 – Coherent and Progressive ELP Standards that Correspond to the State’s Academic Content Standards** | For the State’s assessment system:   * Evidence that the State’s ELP standards align to the State academic content standards. 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. |
| **1.3 – Required ELP Assessments** | For the State’s assessment system:   * Evidence that the State includes ELs with the most significant cognitive disabilities in statewide ELP assessments, either through the general ELP assessment or an alternate ELP assessment (AELPA). If the State does not have an AELPA, it should provide a timeline for when it plans to implement one. |
| **1.5 – Meaningful Consultation in the Development of Challenging State Standards and Assessments** | For the State’s assessment system:   * In the development of challenging ELP standards and assessments, evidence that the State has conducted meaningful and timely consultation with:   + State leaders, including the Governor, members of the State legislature and State board of education (if the State has a State board of education).   + Local educational agencies (including those located in rural areas).   + Representatives of Indian tribes located in the State.   + Teachers, principals, other school leaders, charter school leaders (if the State has charter schools), specialized instructional support personnel, paraprofessionals, administrators, other staff, and parents. |
| **2.1 – Test Design and Development** | For the LAS Links:   * Evidence that the test design and test development process is well-suited for the content, aligns the assessments to the depth and breadth of the State’s ELP standards, and includes:   + 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.   + 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. |
| **2.2 – Item Development** | For the LAS Links:   * 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. For example, provide evidence regarding: 1) the selection and training of item writers; 2) qualifications and experience of item writers; 3) an overall item development plan; 4) test item specifications for selected-response and constructed-response items; 5) detailed procedures to review and evaluate the quality of items before operational use; and 6) a description of how accessibility was incorporated in the item development process. |
| **2.5 – Test Security** | For the LAS Links:   * Evidence that 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:   + Prevention of any assessment irregularities, including maintaining the security of test materials (e.g., a rationale for the relatively limited number of operational forms of the assessment). |
| **2.6 – Systems for Protecting Data Integrity and Privacy** | For the LAS Links:   * Evidence of policies and procedures are in place to protect the integrity and confidentiality of its test materials, test-related data, and personally identifiable information to secure student-level assessment data and protect student privacy and confidentiality, specifically guidelines for districts and schools. |
| **3.1 – Overall Validity, including Validity Based on Content** | For the LAS Links:   * Evidence of adequate alignment between the State’s ELP assessment and the ELP standards the assessment is designed to measure in terms of the depth and breadth of the State’s ELP standards, across all proficiency levels, domains, and modalities identified therein. * 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. |
| **3.2 – Validity Based on Linguistic Processes** | For the LAS Links:   * Adequate validity evidence that its assessments tap the intended language processes appropriate for each grade level/grade-band as represented in the State’s ELP standards (e.g., cognitive labs, reports of expert judgment, empirical evidence such as teacher ratings of student language proficiency, student performance on English language performance tasks, or external assessments of the same knowledge and skills). |
| **3.3 – Validity Based on Internal Structure** | For the LAS Links:   * Adequate validity evidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State’s ELP standards on which the intended interpretations and uses of results are based (e.g., analyses exploring the dimensionality of the LAS Links assessment, especially as it relates to the State’s ELP standards; interpretation of the differential item functioning (DIF) study results in order to strengthen the claim concerning the validity of the internal structure). |
| **4.1 – Reliability** | For the LAS Links:   * 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, specifically:   + Test reliability of the State’s assessments estimated for its student population (e.g., any domain or component sub-tests, as applicable, including a plan to improve the precision of the listening domain test).   + Consistency and accuracy of estimates in categorical classification decisions for the cut scores, achievement levels or proficiency levels based on the assessment results for each domain. |
| **4.2 – Fairness and accessibility** | For the LAS Links:   * Evidence 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. Examples include:   + Interpretations of how the results of DIF analyses support fairness and accessibility.   + Evidence of item development fairness, specifically the qualifications of the reviewers. |
| **4.3 – Full Performance Continuum** | For the LAS Links:   * Evidence that the assessment provides an adequately precise estimate of student performance:   + Across the full performance continuum, including performance for EL students with high and low levels of English language proficiency (e.g., a plan to improve the precision of the listening domain test, as noted in critical element 4.1).   + With different proficiency profiles across the domains of speaking, listening, reading, and writing. |
| **4.4 – Scoring** | For the LAS Links:   * Evidence of standardized scoring procedures and protocols that are designed to produce reliable and meaningful results (e.g., evidence of quality assurance in the scoring of performance tasks by test vendors, procedures for local scoring of the assessments, if any). |
| **4.5 – Multiple Assessment Forms** | For the LAS Links:   * Evidence that the State ensures that all forms adequately represent the State’s ELP standards and yield consistent score interpretations such that the forms are comparable within and across settings (e.g., results from the equating of the various forms of the assessment). |
| **4.6 – Multiple Versions of an Assessment** | For the LAS Links:   * Evidence that the State followed a design and development process to support comparable interpretations of results for students tested across the versions of the assessments (paper, computer-based, and Braille). |
| **4.7 – Technical Analysis and Ongoing Maintenance** | For the LAS Links:   * Evidence that assessment technical quality information is made public, including on the State’s website. |
| **5.3 – Accommodations** | For the LAS Links:   * Evidence that it makes available appropriate accommodations and ensures that its ELP assessments are accessible to ELs with disabilities, specifically ELs with significant cognitive disabilities. * Evidence that it ensures that appropriate accommodations are available for ELs (e.g., a rationale for non-allowable accommodations on the ELP tests). * Evidence that the State has determined that the accommodations it provides: (i) are appropriate and effective for meeting the individual student’s need(s) to participate in the assessments, (ii) do not alter the construct being assessed, and (iii) 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. |
| **6.1 – State Adoption of ELP Achievement Standards for All Students** | For the LAS Links:   * Evidence that the State adopted ELP achievement standards that address the different proficiency levels of ELs. |
| **6.2 – Achievement Standards-Setting** | For the LAS Links:   * Evidence that the State used a technically sound method and process that:   + Involved panelists with appropriate experience and expertise for setting ELP achievement standards.   + Were appropriate for every cut-score adopted at every grade/grade-band. |
| **6.3 – Challenging and Aligned ELP Achievement Standards** | For the LAS Links:   * Evidence that 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. |
| **6.4 – Reporting** | For the LAS Links:   * Evidence that the State provides coherent and timely information about each student’s attainment of the State’s ELP standards to parents that provides, upon request by a parent who is an individual with a disability as defined by the Americans with Disabilities Act (ADA), as amended, are provided in an alternative format accessible to that parent. |

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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# 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** |
| --- | --- | --- |
| ***For English language proficiency (ELP) standards:***  The State formally adopted K-12 ELP standards for all ELs in public schools in the State. | MS English Learner Guidelines - Regulations,  Funding Guidance, and Instructional Supports -  May 2018R, pg. 27  Mississippi Board of Ed Minutes- June 2015 pg.3  PreK-12 English Language Proficiency Standards [Augmentation of the World-Class Instructional Design and Assessment (WIDA) Consortium English Language Proficiency Standards]  MDE-OSA Newsletter – February 24, 2016  MDE-OSA Newsletter - Monthly Update March  2016  LAS Links Notifications (Ongoing)  MS English Learner Guidelines - Regulations,  Funding Guidance, and Instructional Supports -  May 2018R, pg. 27  MS College and Career Readiness Standards for  English Language Arts, 2016, pgs. 10-11 | Mississippi Board of Ed Minutes- June 2015 pg.3- provides a discussion of contracting with DRC, but no evidence of formal adoption of ELP standards could be found in this or other documents submitted by the state.  Documents provided appear to only reference LAS links and use of TESOL standards. |
| Section 1.1 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence that the State formally adopted K-12 ELP standards for all ELs in public schools in the State | | |

## 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** |
| --- | --- | --- |
| ***For ELP standards:***  The ELP standards:   * are derived from the four domains of speaking, listening, reading, and writing; * address the different proficiency levels of ELs; and * align to the State academic content standards (see definition[[1]](#footnote-1)). 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. | Linkage and Alignment Study - MCCRS and  WIDA ELD Standards 2017  LAS Links Alignment to the WIDA Standards -  Sept 2013  Alignment Study - LAS Links to ELPA21  Standards  TESOL ELD Standards Alignment To LAS Links  Assessment Forms C and D  These documents were not cited, but provide additional evidence for this Critical Element:  PreK-12 English Language Proficiency Standards  p. 29 (PDF p. 31)  MS College and Career Readiness Standards for  English Language Arts, 2016, pgs. 10-11 | TESOL standards provide 5 proficiency levels and 4 domains of reading, speaking, listening, and writing, with reference to the language of language arts, mathematics, science, and social studies.  Evidence is needed to demonstrate alignment of proficiency expectations for TESOL standards (2006) with MS CCRS (2016) for each grade/grade band. (The evidence provided in documents 1-4 pointed to alignment of assessment items to other standards – newer WIDA, ELPA21.) |
| Section 1.2 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence that demonstrates ELP standards align to the State academic content standards in reading/language arts, mathematics, and science * Evidence that ELP standards 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 | | |

## Critical Element 1.3 – Required Assessments

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State’s assessment system includes an ***annual general and alternate ELP assessment*** (aligned with State ELP standards) administered to:   * All ELs in grades K-12. | 2017-2018 Mississippi State Testing Calendar  ELPT  2018-2019 Mississippi State Testing Calendar  ELPT  Mississippi Board of Education Minutes, June  18+19, 2015, pg. 3, Item #10, approval on p. 12. | The State provided evidence that it administers an ELP assessment to ELs in grades K-12.  The State will need to provide evidence that is including ELs with significant cognitive disabilities in Statewide ELP assessment, either through the general ELP assessment or an alternate ELP assessment (AELPA).  The State has not submitted an AELPA for ELs with significant cognitive disabilities for this peer review.  The State indicated that it does not provide for an AELPA for ELs with significant cognitive disabilities, but had plans to develop or acquire one. |
| Section 1.3 Summary Statement | | |
| \_X The following additional evidence is needed/provide brief rationale:  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). | | |

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

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| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| * The State has policies that require the inclusion ***of all public elementary and secondary ELs in the State’s ELP assessment***, including ELs with disabilities. | MS English Learner Guidelines - Regulations,  Funding Guidance, and Instructional Supports -  May 2018R, pgs. 18-19,   MS Public School Accountability Standards 10-8-  2018 – pgs. 24, 35-36   MS SBE Policy - Rule 78.1   Individualized Education Program - Rev. August  2018   MS Language Service Plan (LSP)  MDE-OSA Newsletter - Monthly Reminder  February 2016 FINAL   LAS Links Notifications – Ongoing (Document was  discontinued in May of 2016.) | State’s evidence establishes that the State’s assessment system includes all ELs in grades K-12, including ELs with disabilities. The exception is noted in critical element 1.3.  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.  The State has not submitted an alternate ELP assessment (AELPA) for ELs with significant cognitive disabilities for this peer review.  The State indicated that it does not provide for an AELPA for ELs with significant cognitive disabilities, but had plans to develop or acquire one. |
| Section 1.4 Summary Statement | | |
| X As also noted in critical element 1.3, the following additional evidence is needed/provide brief rationale:   * 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). | | |

## 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)).

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| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| If the State has developed or amended challenging ***ELP*** standards and assessments, the State has conducted meaningful and timely consultation with:   * State leaders, including the Governor, members of the State legislature and State board of education (if the State has a State board of education). * Local educational agencies (including those located in rural areas). * Representatives of Indian tribes located in the State. * Teachers, principals, other school leaders, charter school leaders (if the State has charter schools), specialized instructional support personnel, paraprofessionals, administrators, other staff, and parents. | MDE-OSA Newsletter - Monthly Reminder  February 2016 FINAL   LAS Links Notifications – Ongoing (Document was  discontinued in May of 2016.)   MS English Learner Guidelines - Regulations,  Funding Guidance, and Instructional Supports -  May 2018R, pg. 27 | It is unclear if the State has formally adopted ELP standards; the State has ELP standards that it claims are aligned with the ELP assessment.  However, since there is no direct evidence that the State has formally adopted ELP standards it is not possible to ascertain if this critical element applies, although evidence indicates the State has used the current ELP standards since February 2016. Assuming that February 2016 applies as a date of implementation/adoption, this critical element does apply.  Assuming the critical element does apply, the State did not provide evidence to support the criteria for this critical element. |
| Section 1.5 Summary Statement | | |
| X\_ The following additional evidence is needed/provide brief rationale:  For the challenging ***ELP*** standards and assessments, evidence that the State has conducted meaningful and timely consultation with:   * State leaders, including the Governor, members of the State legislature and State board of education (if the State has a State board of education). * Local educational agencies (including those located in rural areas). * Representatives of Indian tribes located in the State. * Teachers, principals, other school leaders, charter school leaders (if the State has charter schools), specialized instructional support personnel, paraprofessionals, administrators, other staff, and parents. | | |

# SECTION 2: ASSESSMENT SYSTEM OPERATIONS

## Critical Element 2.1 – Test Design and Development

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| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State’s test design and test development process is well-suited for the content, is technically sound, aligns the assessments to  ***the depth and breadth of the State’s ELP standards,*** and includes:   * Statement(s) of the purposes of the assessments and the intended interpretations and uses of results; * 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. * 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. * 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. * If the State administers a computer-adaptive assessment, it makes proficiency determinations with respect to the grade in which the 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 *entirely* administered through a portfolio. | DRC LAS Links® Second Edition, Forms C and D  Technical Manual, 2018, pgs. 7-12, 17-20, 24, 26,  33, 101-105  LAS Links Interpretive Guide for Forms C and D,  2017  Linkage and Alignment Study – MS College and  Career Readiness Standards and WIDA ELD  Standards 2017  LAS Links Alignment to the WIDA Standards -  Sept 2013 - This document does not provide evidence of alignment to the state’s selected ELP standards.  TESOL ELD Standards Alignment to LAS Links  Assessment (for Forms C and D)  MS English Learner Guidelines provide evidence of intended uses, but was not cited for this Critical Element. | Evidence provided states the purposes and intended uses.  Test blueprints show coverage of the LAS Links framework.  TESOL standards alignment to LAS Links document implies complete correspondence between “sample” (5, p. 1) TESOL performance indicators (PIs) and LAS Links subskills. Tables 5-8 show item counts per PI. Coverage is varied across the TESOL PIs. It is unclear whether LAS Links covers the range of complexity in the TESOL standards. The alignment evidence is only at a conceptual level. It is also unclear how the state addresses correspondence between grade bands in the TESOL standards vs grade bands in the LAS Links, which do not correspond in K-3.  The LAS Links Technical manual (Chapter 2) describes appropriate test development procedures to support a technically sound assessment, although with little detail or supporting evidence. |
| Section 2.1 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_ X\_ The following additional evidence is needed/provide brief rationale:   * Evidence of test blueprints that provide more detail of technical quality, measure the depth and breadth of the State’s ELP standards, and support the intended interpretations and uses of the results; * Evidence of detailed 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 | | |

## 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** |
| 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. | DRC LAS Links® Second Edition, Forms C and D  Technical Manual: starting on pg. 24  The LAS Links Approach to Alignment and Item Development was not cited by the state for this CE here and could provide evidence, however, it is insufficiently detailed to satisfy the requirements of this Critical Element. | The LAS Links Technical manual (Chapter 2, p. 25-35) describes technically sound test development procedures, including expert input on test design, rationale for choices of item types by domain, qualified item writers, application of general principles and detailed item specifications, item review criteria, and use of multiple statistical criteria to select items for forms. However, all descriptions are only about general processes and criteria, and peers could find no specific, detailed evidence to evaluate.  For example, the references to the development of the items date back to 2013 and earlier. It is not clear that there is an ongoing effort to refresh the items, or if MS has any opportunity to offer representatives to participate in the process. There is only a general description of the educators involved in the original process, no detail about the qualifications of the item writers, nor detail about the actual training provided to item writers.  Concerns about alignment to the state’s ELP standards are noted in CE 2.1 and CE 3.1.  Peers could not find evidence that accessibility tools or their potential effect on the response processes were considered during item development. Other response process concerns are noted in CE 3.2. |
| Section 2.2 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Detailed evidence that state uses reasonable and technically sound procedures to develop and select items | | |

## Critical Element 2.3 – Test Administration

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| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State implements policies and procedures for standardized test administration; specifically, the State:   * Has established and communicates to educators clear, thorough and consistent standardized procedures for the administration of its assessments, including administration with accommodations; * 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; * 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. | LAS Links Test Security Overview, January 2019  LAS Links Site Technology Readiness Checklist  LAS Links Portal User Guide 2019  MS Portal Permissions Matrix  MDE 2019 LAS Links Training - Registration List  MDE\_2019 LAS Links Training Attendance Sign-in/out Sheets  Mississippi Testing Accommodations Manual -November 2017  ELPT Administration Training PPT - Spring 2019  MS English Language Proficiency Test (ELPT) –DTC Training - Winter 2019  MS LAS Links Test Coordinator Manual 2019 -Paper-based  MS Public School Accountability Standards, 10-2018, p. 94 Section 4 Item 5d-5f, p. 95 Section 4 Item 11.  Additional evidence reviewed for this CE but not cited by the state:  English Language Proficiency Test (ELPT) - Winter 2019 - Complete | **Clear procedures**  The state provides procedures for test coordinators, in managing online data and the paper form of the assessment. Peers could find no evidence of the examiner’s guide for the paper form (referenced in LAS Links Test Coordinator Manual for Paper-Based Tests), or any specific procedures for administering the online assessment. It is not clear whether the state relies solely on general guidance in the student assessment handbook. (It was not listed as a source of evidence for CE 2.3.)  Allowable accommodations and accessibility features are documented, as are general procedures for administering accommodations and the prohibition against non-allowable accommodations.  Peers could not locate procedures to ensure inclusion of all students in testing, other than that opting out was not allowable.  **Training**  The state’s accountability standards include requirements that local educators be trained in administration and test security.  The state covers the ELP assessment in training to DTCs and to administrators. Administrator training addresses forms, student experience, encourages use of practice tests, summarizes forms, and data management procedures.  The ELP assessment administration training includes general instructions about accommodated forms, including which accommodations are allowable, relationship to instruction, and how to record in the portal. Peers could not find evidence of training on how to administer assessments with accommodations.  Peers were unable to find evidence of procedures to ensure all appropriate staff are offered, required to take, or received training in general. Evidence should include communications either requiring or recommending certain staff be trained by state or DTCs.  **Technology**  The vendor publishes a checklist for local staff to use when preparing for administration and a user guide for the DRC portal. The state supplements the latter with a roles/permissions matrix specific to MS user roles. Peers could not find evidence that the state disseminates this document to appropriate users.  The vendor has hardware safeguards to prevent disruptions (1, pp. 11-12), however, peers could not find information about the state’s contingency plan in the case of technology challenges during test administration at the school, district, or state level.  Evidence should include a troubleshooting guide or reference, including procedures for interrupted testing, perhaps through test irregularity or testing incident reports from the district to the state. |
| Section 2.3 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Detailed evidence that the state has established and communicates to educators clear, thorough and consistent standardized procedures for the administration of its assessments, including administration with accommodations; * Detailed evidence that the state 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, and know how to make use of appropriate accommodations during assessments for all students with disabilities; * Detailed evidence that the state has sufficiently included technology-based test administration in its standardized procedures for test administration, and established contingency plans to address possible technology challenges during test administration | | |

## Critical Element 2.4 – Monitoring Test Administration

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| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| 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. | LAS Links Test Security Overview, January 2019   Testing Irregularity Report Form  MS Test Audit-Monitoring Instrument   MS Public School Accountability Standards, 10- 2018, p. 94, Section 4, Item 6a-6b. | The State provided some evidence of a system of monitoring State test administrations. For the ELP assessment, evidence was provided describing how the vendor’s online administration system was used for monitoring.  A brief audit protocol form was provided as an example. This form appears to be used for all State tests.  While protocols were shared, there was no evidence that test monitoring of ELP assessments had taken place.  The State did not provide evidence of a systematic plan for selecting schools for monitoring visits. There is no evidence of a rationale or a system to monitor across all tested grades K-12, or how the State selects schools for observations.  There was also minimal evidence of guidance given to LEAs about conducting local monitoring of ELP test administrations.  Staff believe that the State should provide additional evidence regarding the adequate monitoring of ELP test administration. Adequate monitoring could be demonstrated by evidence such as:  • a brief description of the overall State’s approach to monitoring ELP test administration (e.g., monitoring conducted by State staff, through regional centers, by districts with support from the State, or another approach);  • existing written documentation of the State’s procedures for monitoring test administration across the State, including, for example, strategies for selection of districts and schools for monitoring, cycle for reaching schools and districts across the State, training on monitoring, observation forms, schedule for monitoring, monitors’ roles, and the responsibilities of key personnel.  • evidence that monitoring of ELP test administration has occurred, such as State wide summary reports of monitoring activity or a redacted observation/audit report of a single testing site. |
| Section 2.4 Summary Statement | | |
| \_X\_ The following additional evidence is needed/provide brief rationale:   * the State should provide additional evidence regarding the adequate monitoring of ELP test administration. Adequate monitoring could be demonstrated by evidence such as:   + a brief description of the overall State’s approach to monitoring ELP test administration (e.g., monitoring conducted by State staff, through regional centers, by districts with support from the State, or another approach);   + existing written documentation of the State’s procedures for monitoring test administration across the State, including, for example, strategies for selection of districts and schools for monitoring, cycle for reaching schools and districts across the State, training on monitoring, observation forms, schedule for monitoring, monitors’ roles, and the responsibilities of key personnel.   evidence that monitoring of ELP test administration has occurred, such as State wide summary reports of monitoring activity or a redacted observation/audit report of a single testing site. | | |

## Critical Element 2.5 – Test Security

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| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or 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:   * 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; * Detection of test irregularities; * Remediation following any test security incidents involving any of the State’s assessments; * Investigation of alleged or factual test irregularities. * Application of test security procedures to the general ELP assessments and the AELPA. | LAS Links Test Security Overview, January 2019  Testing Irregularity Report Form  MS Test Audit-Monitoring Instrument  MS Public School Accountability Standards, 10-  2018, Appendix F (Standard 16), pgs. 92-102.  MS Public School Accountability Standards,  October 2018, Section 5.3 Special Test Audits,  pg.12, pg. 94 Section 4 Item 5d.  Student Assessment Handbook - October 2015, pgs.  26-33.  Evidence not cited by the state but supporting this CE were the training Power Points and documentation of attendance at training. | **Prevention**  The state’s standards provide expectations for procedures, investigations, and the expectation that staff are trained on security procedures.  Security expectations for paper-based ELP assessments are described on p. 24 of the test administration manual. Security measures taken by DRC for the online version are documented.  Although addressed in later sections, peers note that there are only two forms of the test available, and both are several years old. It is unclear how or if the forms are rotated, however this issue results in excessive form and item exposure, which is a concern for test security.  **Detection, investigation, remediation**  The state describes procedures for statistically detecting irregularities and detailed explanations of what constitutes an irregularity, how it is investigated, and potential consequences.  The state has a mechanism to audit on-site administration for potential signs of irregularities or test security violations and a means for local test coordinators to report potential irregularities.  Evidence was largely based on materials that apply to the entire statewide assessment program, so the processes related to ELP assessments is not specifically called out.  Peers could not find confirmatory evidence that policies and procedures concerning test security are implemented. Peers recommend that the state submit evidence such as auditing cycles, results/follow-up of test security incidents, and SEA responses to or consequences of incidents, including remediation plans. Additional evidence should include samples of District Test Security Plans, and some type of documentation that districts met deadlines for submitting the plans to the state. |
| Section 2.5 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence that there are sufficient processes in place to prevent overexposure of test forms or test items; * Evidence that the state has taken steps to monitor test security and remediate any test security incidents; * Evidence that the state has investigated alleged or factual test irregularities | | |

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

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| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| 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:   * To protect the integrity of its test-related data in test administration, scoring, storage and use of results; * To secure student-level assessment data and protect student privacy and confidentiality, including guidelines for districts and schools; * 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. | LAS Links Testing Security Overview, January  2019  MS Public School Accountability Standards, 10-  2018, Appendix F (Standard 16), pgs. 92-102.  MS Public School Accountability Standards, 10-  2018, Section 5.3 Special Test Audits, pg. 12. pgs.  92-93 Section 4 Items 1-4.  Student Assessment Handbook - October 2015  Mississippi Data Governance Guidelines - May  2017, Section 4.5 (pg. 8), Section 6 (pg. 11),  Section 8 (pg. 12), Section 9 (pg. 13)  Executed MOU for Data Recognition Corporation  1.14.2016 | **Integrity**  Integrity of test data during the administration process is described in response to CE 2.5 for both online and paper versions of the ELP assessment.  The state has guidelines for collection and reporting of data, including responsible roles, and procedures for responding to data requests from various audiences and conducting audits. The same document refers to a separate document (not provided) that describes procedures for handling data breaches. Vendor procedures for data security during storage and transmittal are described in the evidence.  **Student privacy**  The state limits access to data for internal staff and requires annual FERPA training.  The state has an MOU with DRC that addresses data security requirements, including storage and right to audit.  DRC documents procedures to protect PII.  Peers could not find evidence that local staff are trained on expectations for secure handling and storage of assessment data.  **PII in reporting**  The state has established minimum cell counts and suppression rules for aggregated reporting.  State guidelines describe the process for acting on external and LEA requests for data including aggregation or calculations.  Peers recommend that the state provide explicit direction regarding safeguards against disclosing PII as part of aggregation to prevent use by the LEA that might lead to disclosure. |
| Section 2.6 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence that local staff are trained on expectations for secure handling and storage of assessment data | | |

# SECTION 3: TECHNICAL QUALITY – VALIDITY

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

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| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State has documented adequate overall validityevidence for its assessments consistent with nationally recognized professional and technical testing standards. The State’s validity evidence includes evidence that:  ***The State’s ELP assessments*** measure the knowledge and skills specified in the State’s ELP standards, including:   * 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; * 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; * 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. | LAS Links Alignment to WIDA Standard report  (Spring 2018), pg. 9  TESOL ELD Standards Alignment to LAS Links  Assessment (for Forms C and D)  DRC LAS Links® Second Edition, Forms C and  D Technical Manual, 2018, pgs. 22-24, 32-33, 44,  61-98, 196-203 | The state uses the TESOL (2009) standards, which are an “augmentation” of the 2004 WIDA standards. The state’s content-related evidence response mentioned alignment of LAS Links to two sets of standards not used by the state: 2007 WIDA standards and the ELPA 21 standards.  LAS Links assessments are built on the LAS Links 2012 Standards Framework. Sample correspondences between the 2012 Standards Framework and CCSS and TESOL are provided.  Test blueprints show coverage of the LAS Links framework.  The document TESOL ELD Standards Alignment to LAS Links Assessment implies complete correspondence between “sample” TESOL performance indicators (PIs) and LAS Links subskills. Coverage is varied across the TESOL PIs. It is unclear whether LAS Links covers the depth and breadth of the TESOL standards across proficiency levels and domains. The alignment evidence is at a conceptual level.  It is also unclear how the state addresses correspondence between grade bands in the TESOL standards and the grade bands in LAS Links, which do not correspond to each other in K-3.  Although not listed for CE 3.1 the state also provided evidence of an alignment study between MS CCRS ELA standards and WIDA’s 2012 standards, with a few gaps noted for reading foundational skills and range of writing. Again, these are not the state’s ELP standards. There is no evidence that the TESOL standards align with the language demands in the MS CCRS.  In summary, the various linkages among standards and assessments do not lay a clear foundation of which standards are intended to be assessed, nor which alignment is intended to provide the best evidence.  References are made to WIDA, TESOL, and ELPA 21 standards, and the TESOL-to-LAS Links alignment document is simply a matched table of skills and performance indicators.  Without a clear indication of intended linkages, it is not possible to determine if this CE has been met. |
| Section 3.1 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence of adequate alignment between the State’s ELP assessment and the state’s ELP standards 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; * Evidence of alignment between the State’s ELP standards and the language demands implied by, or explicitly stated in, the State’s academic content standards | | |

## Critical Element 3.2 – Validity Based on Linguistic Processes

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| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State has documented adequate validityevidence that its assessments tap ***the intended language processes*** appropriate for each grade level/grade-band as represented in the State’s ELP standards. | DRC LAS Links® Second Edition, Forms C and  D Technical Manual, 2018, pgs. 61-98, 196-203 | Peers could find no direct evidence that student response processes were evaluated for LAS Links, only the general steps taken during test development.  During the test development phase, CTB took steps to prevent items from introducing construct-irrelevant variance and promote the test taker’s use of the intended response process.  For LAS Links field testing, scorers were trained before local scoring of speaking and constructed response reading and writing items.  It is unclear what conclusions are being drawn regarding response processes evidence based on the table data presented in the state’s index regarding the national norming study. The evidence seems more appropriate for CE 3.3.  Per peer review guidance, peers recommend the state submit evidence that could include cognitive labs, reports of expert judgment; or empirical evidence such as teacher ratings of student language proficiency, student performance on performance tasks, or external assessments of the same knowledge and skills. |
| Section 3.2 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence that the State’s assessments tapthe intended language processes appropriate for each grade level/grade-band as represented in the State’s ELP standards | | |

## Critical Element 3.3 – Validity Based on Internal Structure

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| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State has documented adequate validityevidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State’s ***ELP standards*** on which the intended interpretations and uses of results are based. | DRC LAS Links® Second Edition, Forms C and  D Technical Manual, 2018, Chapter 6, pgs 61–78 | Assuming that the state is using TESOL standards, there are five of them (social/intercultural/instructional, language arts, mathematics, science, social studies). Each is divided into the 4 domains of reading, writing, speaking, and listening.  LAS Links reports domain, composite, and overall scores, and according to language context strands that map onto TESOL standards.  The LAS Links technical manual describes relationships between the four domains (Listening, Speaking, Reading, and Writing) and composite scores (Oral, Comprehension, Literacy, Productive, and Overall) by showing the crosswalks. The language context strands are calculated based on “subskill score” categories when there are sufficient score points to support reporting.  The state provides evidence of internal structure of LAS Links as coefficient alpha and SEM for raw and scale scores for reading, writing, speaking, listening and the SEM for each domain’s TCC (pp. 84-91). Peers could find no evidence for the internal consistency of composite scores or language context strands, or any evidence of the factor structure to indicate any of the subdomains are distinct from one another. There was also no rationale or empirical defense found for how the domain scores are combined into an overall score other than to say that it is the average of the four domain scores.  The tables noted in the state’s submission index for CE 3.2 could have been cited here as evidence of correlations among test components. Since it is unclear how the domains are defined, it is unclear whether these correlations are adequate.  The tables cited by the state in this CE relate to cut scores, which do not address any of the evidence suggested for meeting the requirements of this section.  Peers could find no evidence with respect to:   * DIF – a description of the analysis was given in the Technical Report, but no quantitative analysis was offered for results, nor for the number of items exhibiting DIF that were included/excluded from the test. * Validity of scores generated from less than four domains, which includes calculation of scores for missing domains for students with disabilities for whom certain domains are inappropriate   The technical manual recommends using LAS Links scores for low-stakes purposes only, unless triangulated with other evidence. That recommendation is counter to the state’s intended uses of results for high-stakes decisions. It is not clear then what support MS gives for using the scores to make exit decisions. Based on the state board rule, there do not appear to be other criteria used in making that decision, whereas the technical report recommends using this as one part of a triangulation of other evidence. |
| Section 3.3 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * Adequate validityevidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State’s ELP standards on which the intended interpretations and uses of results are based | | |

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

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| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State has documented adequate validityevidence that the State’s assessment scores are related as expected with other variables. | ELPT and MAAP Correlation Results 2017-2018  (based on Spring 2018 ELP Assessment, MAAP  ELA + HS English II, and MAAP Math + Algebra  I) | The state provided separate frequency distributions on the ELP assessment and MAAP ELA and mathematics. There were no bivariate calculations showing within-student relationships between ELPA and MAAP performance level, nor are any conclusions drawn.  In cooperation with the vendor in forming its research plan, the state should ensure sufficient specificity so that appropriate evidence is produced. |
| Section 3.4 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Adequate validityevidence that the State’s assessment scores are related as expected with other variables | | |

# 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** |
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| The State has documented adequate reliabilityevidence 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:   * Test reliability of the State’s assessments estimated for its student population (***for ELP assessments, including any domain or component sub-tests, as applicable*)**; * Overall and conditional standard error of measurement of the State’s assessments, including any domain or component sub-tests, as applicable; * Consistency and accuracy of estimates in categorical classification decisions for the cut scores, achievement levels or proficiency levels based on the assessment results; * For computer-adaptive tests, evidence that the assessments produce test forms with adequately precise estimates of ***an EL’s English proficiency***. | DRC LAS Links® Second Edition, Forms  C and D Technical Manual, 2018,  (Chapter 4, p. 46-52), (Chapter 6, p. 61-  76), (Chapter 7, p. 77-95), Appendix C  (pgs. 110-113) | The vendor’s research agenda for 2019 includes form reliability and classification consistency. The statistics provided are dated. There are no data for MS specifically, however, which is a requirement. The data for each state using LAS Links should be included in the vendor’s research agenda.  The technical manual provides evidence of internal structure of LAS Links as coefficient alpha and SEM for raw and scale scores for reading, writing, speaking, listening, SEM for each domain’s TCC, and the CSEM associated with each domain scale score (appendix E). There is evidence of interrater agreement for the human-scored sections of reading and writing.  There is general evidence for reliability of domain scores and classification accuracy for performance levels in each domain. However, peers did not find empirical evidence for reliability or classification consistency of composite scales and their performance levels, or evidence for “each student group.” Peers recommend that the state calculate subgroup reliabilities as appropriate for the population (e.g., by language group, disability status, or recency of arrival in the U.S., provided there are sufficient n-sizes).  For the state, the exit criteria is set at the cut between levels 3 and 4, so it would be important to specifically include sufficient defense of the reliabilities and classification accuracy at those points on the scale across grades/grade spans.  There are five performance levels, but the raw score points available range from a low of 20 in listening to a high of 41 in speaking (Appendix C of the Technical Manual), consequently, it is unlikely that the test is sufficiently long/precise enough to support five achievement levels, especially for listening. |
| Section 4.1 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Recent and empirical evidence of test reliability of the State’s assessments estimated for its student population, including subgroups, as applicable, and by domain; * Recent and empirical evidence of overall and conditional standard error of measurement of the State’s assessments, including any domain or component sub-tests, as applicable; * Recent and empirical evidence of consistency and accuracy of estimates in categorical classification decisions for the cut scores and proficiency levels based on the assessment results | | |

## Critical Element 4.2 – Fairness and Accessibility

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| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| ***For all State ELP assessments,*** assessments should be developed, to the extent practicable, using the principles of universal design for learning (UDL) (see definition[[2]](#footnote-2)).  ***For ELP assessments,*** 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. | DRC LAS Links® Second Edition,  Forms C and D Technical Manual,  2018, pgs. 26, 34, 94-96, 102, | The vendor describes processes to promote fairness, including guidelines per domain, application of UDL guidelines during test development and internal and external review, attention to bias and sensitivity criteria, and inclusion of a diverse sample in the field test based on geographic location (state), gender, ethnicity, and home language. Procedures for developing the braille form are described. However, these are only very general descriptions of the processes used, and the qualifications of the reviewers are not provided. As such, it is difficult to determine whether the processes used were adequate.  When an additional form is created as described elsewhere in the submission, attention should be paid to adequately detailing the processes used, including qualifications of reviewers.  Evidence describes DIF analysis based on gender, ethnicity, and ELL status, but no empirical evidence could be found (e.g., distribution of items flagged, consideration of data, or criteria for removal of items based on DIF). Peers could not find evidence that ELs with disabilities were considered during item development, or statistical evaluation of fairness.  See comments in CE 4.4 regarding score interpretations for Category 3 accommodations. |
| Section 4.2 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Empirical 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; * Detailed evidence regarding the processes used to develop the assessments, including, but not limited to, the qualifications of the reviewers | | |

## Critical Element 4.3 – Full Performance Continuum

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| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State has ensured that each 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 and with different proficiency profiles across the domains of speaking, listening, reading, and writing. | DRC Scorer Training Protocol  DRC LAS Links® Second Edition, Forms C and D  Technical Manual, 2018,  Chapter 3 (p. 36), Chapter  4 (p. 46), Chapter 6 (p. 61),  Chapter 7 (p. 77),  Appendix C (p. 110),  Appendix F (p. 196),  Appendix G (p. 204) | The LAS Links technical manual describes procedures used during item development and form building to develop items with an intended appropriate range of difficulty.  Evidence was provided regarding item difficulties (Appendix F), SEM for each domain’s TCC (pp. 84-91), and the CSEM associated with each domain scale score (Appendix E).  Vendor implemented LOSS and HOSS after scaling, per domain and composite scale (pp. 50-52). However, peers could find no evidence of the distribution of linguistic complexity of the tasks, nor domain-specific proficiency profiles.  As noted previously, the test may not be sufficiently long/precise enough to support five achievement levels. Furthermore, some listening and writing items are extremely easy, with p-values as high as .99. The forms could benefit from refreshing to remove the items that provide little information. |
| Section 4.3 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * Evidence that the assessment provides adequately precise estimates of student performance across the full performance continuum, including performance for EL students with high and low levels of English language proficiency * Evidence of reliability for different proficiency profiles across the domains of speaking, listening, reading, and writing | | |

## Critical Element 4.4 – Scoring

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| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State has established and documented standardized scoring procedures and protocols for its assessments (and ***for ELP assessments, any applicable domain or component sub-tests***) that are designed to produce reliable and meaningful results, facilitate valid score interpretations, and report assessment results in terms of the State’s ***ELP standards***.  ***For ELP assessments,*** 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.[[3]](#footnote-3) | DRC Scorer Training  Protocol  DRC LAS Links® Second  Edition, Forms C and D  Technical Manual, 2018,  Chapter 1 (p.4), Chapter 5  (pgs. 56-59)  DRC LAS Links  Interpretation Guide for  Forms C and D, pgs. 16,  20-37  LAS Links Approach to  Alignment and Item  Development | **Scoring procedures**:  The vendor provided a rationale for selection of IRT models for each item type. Calibration was based on the field test sample and was separate for the four domains. Items with misfit were removed. The technical manual describes the process but provides no empirical evidence.  The vendor describes procedures for locally-driven scoring, but it is not clear whether or how MS employs this approach.  There is evidence of interrater agreement for the human-scored sections of reading and writing. While IRR statistics were provided, it is not clear what the score ranges are. For some items, the maximum score is 1, but there is a significant percentage of scores assigned that were discrepant. Some items have as many as 65% of the writing responses being assigned a condition code rather than a score. Depending upon what the condition codes are, this could indicate that there is an issue with the tasks rather than an issue with the scoring. Similarly, some items also have up to 13% discrepant scores. This is unusually high for an IRR, and may also indicate issues with tasks rather than issues with scorer training.  **Scaling**:  The vendor provided a rationale for choice of the common scale, and the method for developing the scale included equivalent sample and common item approaches. The field test design supported vertical scaling. Separate calibration per domain supports evaluation of growth in each domain. However, peers could not find information on the process of creating or evaluating composite scale scores (i.e., overall, oral, comprehension, literacy, and productive).  As noted previously, scaling should include more current operational data from the states that use LAS Links.  Achievement standards were originally set in 2005, and only in Grades K, 2, 4, 7, and 11, according to the Standard Setting Technical Report. Peers could not locate detail regarding why this approach was chosen, nor whether or how the scaling/cuts were applied across all grades/grade bands. Moreover, as stated in CE 2.1, there appears to be misalignment between TESOL standards and LAS Links in Grades K-3.  **Domain exemption:**  Peers could not find information in the technical manual or interpretation guide (including local scoring section) on vendor instructions for calculating overall proficiency when there is a domain exemption.  According to MS policy, if an EL cannot be assessed on the LAS Links Assessment in one or more domains of the English Language Proficiency Test due to a disability, and there is no appropriate accommodation, the student’s English language proficiency will be based on the domains that can be assessed. However, it appears that such students do not receive equal benefit, as they cannot be exempted in reading or writing and still exit. This is because all students are required to obtain the following proficiency levels on the ELPT in order to exit:  a. Overall Proficiency Level 4 or 5, and  b. Reading Proficiency Level 4 or 5, and  c. Writing Proficiency Level 4 or 5.  The vendor provides cautions against interpreting scores as comparable when Category 3 accommodations are provided. Since braille and ASL presentation are both Category 3 accommodations, this raises questions regarding valid score interpretation, fairness, and provision of equal benefits for populations that use these accommodations.  As mentioned previously, there is not an adequate defense of the composite score, which is an average of the four domains. |
| Section 4.4 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence that the State has adequately established and documented standardized scoring procedures and protocols for its assessments; including domain and composite scores that are designed to produce reliable and meaningful results; facilitate valid score interpretations; and report assessment results in terms of the State’s ELP standards; * Evidence for calculating the overall proficiency of English learners with a disability that precludes assessment of the student in one or more of the required domains/components (listening, speaking, reading, and writing); and that such results yield reliable and meaningful results that support exit decisions and other equal benefits | | |

## Critical Element 4.5 – Multiple Assessment Forms

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| If the State administers multiple forms of ***ELP assessments*** within or across grade-spans, ELP levels, or school years, the State ensures that all forms adequately represent the State’s ***ELP standards*** and yield consistent score interpretations such that the forms are comparable within and across settings. | DRC LAS Links® Second  Edition, Forms C and D Technical Manual, 2018, Chapter 4 (pgs. 46-52) | The LAS Links field test design incorporated three approaches to support linking forms C and D to the existing scale: anchor subtests; forms with all subtests; and subtests from adjacent levels. The technical manual provides only general information on the process, but no empirical evidence could be found.  It is not clear how the two forms are currently used in MS, nor how the third form will be implemented. If they are used in alternating years, students not exiting in 6-8 or 9-12 would see the same form twice in 6-8 and twice in 9-12. This is addressed in CE 2.5 as an issue with test security.  Peers recommend that the state not rely solely on the vendor’s 2011-12 field test data to place the forms onto the same scale. |
| Section 4.5 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Empirical evidence on linking of current forms and any additional forms to be developed | | |

## Critical Element 4.6 – Multiple Versions of an Assessment

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| 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:   * Followed a design and development process to support comparable interpretations of results for students tested across the versions of the assessments; * Documented adequate evidence of comparability of the meaning and interpretations of the assessment results. |  | Peers recommend that the research agenda include all aspects of requirements for this CE, including, but not limited to, online vs paper, and evidence to support device comparability. To the extent possible, research should include studies on braille form comparability. |
| Section 4.6 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence of a design and development process to support comparable interpretations of results for students tested across different versions of the assessments; * Evidence of comparability of the meaning and interpretations of the assessment results for multiple versions of the assessments, including paper, online, and accommodated forms, to the extent possible based on n-sizes | | |

## Critical Element 4.7 – Technical Analysis and Ongoing Maintenance

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State:   * 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 * Evidence of adequate technical quality is made public, including on the State’s website. | DRC LAS Links Research Meeting Notes and  Agenda - December 19, 2018. | The state appears to be relying solely on the vendor’s future research plans.  Limited evidence is provided regarding vendor plans for future operational analyses. Moreover, it was not clear what CEs the vendor plans would address, or whether the planned studies would yield the necessary evidence (e.g., there would still be some areas unaddressed, such as domain exemptions).  Peers could not find evidence that MS is monitoring its own use of LAS Links as an ELP assessment, such as via the state’s Technical Advisory Committee, or that evidence is made public.  Peers could not find evidence of any type of LAS Links TAC.  Peers could not find evidence for ongoing refreshment of items, item bank, or retirement of dated test forms. |
| Section 4.7 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence of a system for monitoring, maintaining, and improving the quality of its assessment system, including clear and technically sound criteria for the analyses of the assessments; * Evidence that the technical quality is made public, including on the State’s website | | |

# 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** |
| --- | --- | --- |
| The State has in place procedures to ensure the inclusion of all public elementary and secondary school students[[4]](#footnote-4) 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.   * ***For ELP assessments,*** 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). | MS English Learner Guidelines - Regulations,  Funding Guidance, and Instructional Supports -  May 2018R, pgs. 18-19, 31-33  Individualized Education Program Development  Guidance - Rev. 02-07-2014  Individualized Education Program, Rev. 8-24-2018  Mississippi Testing Accommodations Manual,  November 2017R | Evidence indicates that all eligible students in MS are required to participate in the assessment, with the exception of those with the most significant cognitive disabilities. It is not clear what assessment such students are required to take, if any.  In the IEP development guidance document, the state references ELP assessments not adopted, and does not reference LAS Links as an option. This raises serious questions regarding the inclusion of students with disabilities who are ELs, other guidance notwithstanding.  As stated in CE 4.4, while state guidelines indicate “If an EL cannot be assessed on LAS Links Assessment in one or more domains of the English Language Proficiency Test due to a disability, and there is no appropriate accommodation, the student’s English language proficiency will be based on the domains that can be assessed”, there is still the concern regarding exit criteria and equal benefits, given the state’s exit requirements. |
| Section 5.1 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence of alignment between IEP guidance and state policy regarding inclusion of students with disabilities who are ELs; * Evidence to ensure equal benefits for English learners with a disability that precludes assessment of the student in one or more of the required domains/components (listening, speaking, reading, and writing) | | |

## 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** |
| --- | --- | --- |
| * + Note: This critical element does not apply to ELP assessments, as the requirements only apply to the inclusion of ELs in **academic assessments**. |  |  |
| Section 5.2 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

## Critical Element 5.3 – Accommodations

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| 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:   * Ensures that appropriate accommodations are available for ELs; * 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; * Has a process to individually review and allow exceptional requests for a small number of students who require accommodations beyond those routinely allowed. * 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. | MS English Learner Guidelines - Regulations,  Funding Guidance, and Instructional Supports -  May 2018R, pgs. 18-19, 31-33  Individualized Education Program Development  Guidance - Rev. 02-07-2014  Individualized Education Program, Rev. 8-24-2018  Mississippi Testing Accommodations Manual,  November 2017R  MS Language Service Plan (LSP)  LAS Links Accessibility Guide | In the evidence provided, guidance from the state appears to be more restrictive than guidance provided by the vendor regarding which accommodations are allowable. The state restrictions for ELP assessment accommodations also appear to be more strict than for accommodations allowed on other MS statewide assessments.  For example, on pp. 17- 30 of the Mississippi Testing Accommodations Manual, there a number of accommodations marked as “No” for the ELP assessment, including, among others, braille and magnification tools. In a number of rows, LAS Links is the only assessment marked as a “No” for certain accommodations, when it appears that they should be marked “Yes” or “N/A”, based on what the vendor recommends for LAS Links.  It was unclear how the state treated the tools embedded in LAS Links. The table describes the items as universal tools but the introductory text implies they are accommodations.  LAS Links available accommodations are based on the CTB TerraNova (tech manual - pp. 56-57). As such, peers could not find specific evidence for appropriateness, lack of impact on the construct, or support for meaningful and comparable interpretations of LAS Links results. |
| Section 5.3 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence that accommodations do not alter the construct being assessed; * Evidence of consistency in guidance between vendor and state regarding allowable accommodations | | |

## 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** |
| --- | --- | --- |
| 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:   * Consistent with the State’s policies for accommodations; * Appropriate for addressing a student’s disability or language needs for each assessment administered; * Consistent with accommodations provided to the students during instruction and/or practice; * 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; * Administered with fidelity to test administration procedures; * Monitored for administrations of all required ELP assessments, and AELPA. | Office of Federal Programs FY19 Monitoring  Packet, February 2019 [R]  Testing Irregularity Report Form  MS Test Audit-Monitoring Instrument  MS Public School Accountability Standards, 10-  2018, Appendix F (Standard 16), pgs. 92-102.  MS Public School Accountability Standards,  October 2018, Section 5.3 Special Test Audits,  pg.12, pg. 94 Section 4 Item 5d. | General guidance was provided for test administration monitoring, including general guidance for monitoring of administering assessments with accommodations. As stated in CE 5.3, peers could not find documentation of consistency of guidance between the vendor and the state regarding policies and procedures for administering assessments with accommodations.  The Office of Federal Programs FY 19 Monitoring Packet document does not provide sufficient evidence for this CE. The document refers more to overall program monitoring, including budget, with only some mention of parent notification and test security.  Peers could find no evidence of any systematic process to monitor test administration for special populations, results of any self-assessments conducted, or SEA responses to these self-assessments.  While evidence was provided regarding requirements to train staff in proper administration procedures and procedures to detect irregularities, peers could not find evidence that training included information on administering assessments with accommodations.  The test audit monitoring form includes only one question about ELLs and only one question about SWDs, including appropriate procedures, and whether there was documentation to support accommodations.  It was unclear how many sessions are monitored per year, or whether the monitoring approach includes sampling of ELP assessments. Furthermore, it was unclear how the monitoring approach would address consistency with accommodations provided during instruction, or whether accommodations were appropriate for addressing a student’s accommodations needs during assessment. |
| Section 5.4 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence of monitoring that tests are administered consistent with the State’s policies for accommodations; * Evidence of systematic monitoring that accommodations provided are appropriate for addressing a student’s disability or language needs for each assessment administered; * Evidence that accommodations provided during assessment are consistent with accommodations provided to the students during instruction and/or practice; * Evidence that accommodations provided during assessment are consistent with the student’s IEP under IDEA or accommodations under Section 504; or for students covered by Title II of the ADA, or through another process for an EL; * Evidence that assessments are administered with fidelity to test administration procedures for all special populations | | |

# 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** |
| --- | --- | --- |
| ***For ELP standards:***   * The State adopted ELP achievement standards that address the different proficiency levels of ELs; * 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. | PreK-12 English Language Proficiency Standards  [Augmentation of the World-Class Instructional  Design and Assessment (WIDA) Consortium  English Language Proficiency Standards  MDE-OSA Newsletter – February 24, 2016  MDE-OSA Newsletter - Monthly Update March  2016  LAS Links Notifications (Ongoing)  MS English Learner Guidelines - Regulations,  Funding Guidance, and Instructional Supports -  May 2018R, pg. 27  LAS Links Proficiency Level Descriptors (English  and Spanish)  LAS Links Proficiency Level Definitions (English  and Spanish)  TESOL ELD Standards Alignment to LAS Links  Assessment Forms C and D | Documentation provided does not appear to include evidence of the state officially adopting ELP achievement standards. Documents reference use of TESOL language standards, which are not achievement standards.  There is no evidence that the state has formally adopted the ELP assessment achievement levels, either through legislation, policy, or state board of education action.  On p. 19 of the MS English Learner Guidelines - Regulations, Funding Guidance, and Instructional Supports, reference is made to EL exit criteria adopted in SBE Rule on January 19, 2017. A web search of the [agenda item](https://www.mdek12.org/sites/default/files/documents/MBE/MBE%20-%202017%20(1)/tab-07-ell-exit-criteria-backup.pdf) reveals that only exit criteria were addressed, and overall proficiency levels were not adopted at this meeting. |
| Section 6.1 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence that the State has adopted ELP achievement standards that address the different proficiency levels of ELs | | |

## 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** |
| --- | --- | --- |
| The State used a technically sound method and process that involved panelists with appropriate experience and expertise for setting:   * ***ELP achievement standards and, as applicable, alternate ELP achievement standards***, such that:   + Cut scores are developed for every grade/grade band, content domain/language domain, and/or composite for which proficiency-level scores are reported. | LAS Links Standard Setting Technical Report  LAS Links Approach to Alignment and Item  Development  DRC LAS Links® Second Edition, Forms C and D  Technical Manual, 2018, (Differential Item  Functioning Analysis for LAS Links, pgs. 93-96) | Mississippi relies on the achievement level cuts set by the vendor for LAS Links in 2005. A modified bookmark approach was used to set the original standards, with panels only setting cuts in Grades K, 2, 4, 7, and 11. No rationale for use of this method could be found, including how the cuts were applied across all grades/grade bands.  LAS Links 2nd edition achievement standards were based on a 2-phase cut score review process in 2013, with no rationale provided for the methodology used. Panelists reviewed cuts in all four domains. CTB elected to treat panel recommendations as equivalent to the original cuts.  Peers could find no information as to how the achievement level cuts were applied across all grades/grade bands. As noted in CE 2.1 and 4.4 there appears to be misalignment of standards between LAS Links and the TESOL standards in Grades K-3. This raises questions regarding the appropriateness of the achievement level standards within and across these grades.  The number of standard setting participants was given, none of whom were from MS, but no descriptions of the group members’ qualifications or expertise were provided. On p. 61 of the Technical Manual, they are only described as a “national committee of ELL educators”.  Sections A and B (Executive summary and Workshop Overview) of the standard setting document are blank. Important context and information relevant to this review may have therefore been lost/deleted in the submission.  Peers could not find a plan or evidence for validating the exit criteria, e.g., by comparison of performance on the ELP assessment with performance on MS statewide academic assessments. |
| Section 6.2 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence that the State used a technically sound method and process that involved panelists with appropriate experience and expertise for setting; * Evidence that cut scores are developed for every grade/grade band, and composite for which proficiency-level scores are reported; * Evidence for validating the exit criteria by comparison with achievement on academic assessments | | |

## 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** |
| --- | --- | --- |
| ***For ELP achievement standards*:**  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.  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. | LAS Links Standard Setting Technical Report  LAS Links Approach to Alignment and Item  Development  DRC LAS Links® Second Edition, Forms C and D  Technical Manual, 2018 | Performance level descriptors are documented, but peers could not find sufficient evidence of the process used to develop them.  LAS Links Approach to Alignment and Item  Development document does not apply to this CE. Moreover, the statement offered by the State in the Submission Index addresses the ELP language standards, not the performance standards, thus offering no support for this CE.  Peers could find no evidence of correspondence between the PLDs developed in the CTB standards review process and the TESOL standards used in the state, or of how the state addressed the differences in grade band configuration between TESOL standards and LAS Links.  It should be noted here that, as stated previously in CE 1.1 and elsewhere, peers could find no evidence that the state has formally adopted any ELP language standards. This is a prerequisite to meeting many requirements throughout several CEs, including this one. |
| Section 6.3 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence, including a plan and timeline, to ensure that ELP assessment results are expressed in terms that are clearly aligned with the State’s formally-adopted ELP standards, and its ELP performance-level descriptors | | |

## Critical Element 6.4 – Reporting

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| 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.  The State reports to the public its assessment results on ***English language proficiency for all ELs*** ***including the number and percentage of ELs attaining ELP***.  For the ***ELP assessment***, the State provides coherent and timely information about each student’s attainment of the State’s ELP standards to parents that:   * + Reports the ***ELs’ English proficiency*** in terms of the State’s grade level/grade-band ELP standards (including performance-level descriptors);   + Are provided in an understandable and uniform format;   + 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;   + 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. | Welcome to DRC Online Reporting - Sample email  sent to local districts  LAS Links Sample Reports, January 2019  LAS Links Online Second Edition Sample Reports  for Forms C and D – Peers note that this document has the same content as LAS Links Second Edition Sample Reports  MS Report Card for English Learners, 2017-2018 | The MS Report Card for English Learners, 2017-2018 provides the minimum requirements of number and percentage of students who were proficient, and percent making expected growth. However, peers could not find required summary data by grade, nor by domain. This report appears to be intended for accountability purposes as well. If so, there does not appear to be sufficient evidence to support appropriate, credible, and defensible interpretations of the information provided. Similarly, peers could find no link between reports and program decisions, with the exception of criteria for program exit.  While not cited for this CE, the LAS Links Interpretive Guide, Section 3 does provide sample reports including Home Reports. However, it is unclear whether the document is sufficiently tailored to parents or teachers, nor is it clear if this document is provided to the state’s stakeholders. Moreover, it is unclear what other materials, if any, the state makes available to support appropriate interpretation and uses of results, or where this material can be located by stakeholders. Also, it is unclear if there are resources to support appropriate interpretation of results relative to the state’s ELP standards.  Peers could not find evidence of which LAS Links reports are used in the state, timeliness of reporting of state results, processes for accessing reports in other languages, or information on ADA-accessible versions.  Evidence provided indicates a contract for translated reports, but peers could not find evidence that these were used. |
| Section 6.4 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence that 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;   + Evidence that the State reports the ELs’ English proficiencyin terms of the State’s grade level/grade-band ELP standards (including performance-level descriptors);   + Evidence that reports are provided in an understandable and uniform format and 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;   + Evidence that reports, 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 | | |

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

1. 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) [↑](#footnote-ref-1)
2. 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) [↑](#footnote-ref-2)
3. 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> ) [↑](#footnote-ref-3)
4. For ELP peer review, this refers to ELs with disabilities. [↑](#footnote-ref-4)