

United States Department of Education

office of elementary and secondary education

The Honorable Susan Bunting

Secretary of Education

Delaware Department of Education

The Townsend Building

401 Federal Street, Suite 2

Dover, DE 19901-3639 January 31, 2020

Dear Secretary Bunting:

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 Delaware Department of Education (DDOE) to prepare for the peer review, which occurred in August 2019.

State assessment systems provide essential information that States, districts, principals and teachers can use to identify the academic needs of students, target resources and supports toward students who need them most, evaluate school and program effectiveness and close achievement gaps among students. A high-quality assessment system also provides useful information to parents about their children’s advancement against and achievement of grade-level standards. The Department’s peer review of State assessment systems is designed to provide feedback to States to support the development and administration of high-quality assessments.

External peer reviewers and Department staff carefully evaluated DDOE’s submission, which included several assessments. Based on the recommendations from this peer review and our own analysis of the State’s submission, I have determined the following:

* Reading/language arts and mathematics general assessments for grades 3-8 (Smarter Balanced): **Meets requirements of the ESEA, as amended by ESSA.**

Congratulations on this significant accomplishment. Assessments that produce valid and reliable results are fundamental to a State’s accountability system. Please be aware that approval of DDOE’s use of Smarter Balanced for assessments is not a determination that the system complies with Federal civil rights requirements, including Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, and requirements under the Individuals with Disabilities Education Act. Also, please remember that, if DDOE makes significant changes in its assessments, the State must submit information about those changes to the Department for review and approval.

Regarding the other assessments, the Department found, based on the evidence received, that the components of your assessment system meet many, but not all, of the statutory and regulatory requirements of sections 1111(b)(1) and (2) of the ESEA, as amended by ESSA. Based on the recommendations from this peer review and our own analysis of the State’s submission, I have determined the following:

* Reading/language arts and mathematics general assessments in high school (SAT): **Substantially meets requirements of the ESEA, as amended by ESSA.**
* Reading/language arts, mathematics, and science alternate assessments based on alternate academic achievement standards (AA-AAAS) in grades 3-8 and high school (DeSSA-Alt): **Substantially meets requirements of the ESEA, as amended by ESSA.**

**Substantially meets requirements** means that these components meet most of the requirements of the statute and regulations but some additional information is required. The Department notes that while your State met more of the requirements related to State administration of the SAT, as compared to the initial peer review in 2018, *significant* concerns related to test design and alignment with State standards have not yet been addressed. Alignment to the State’s challenging academic standards is critical to having a valid and reliable assessment system. The Department must see that the State has made substantial progress towards improved evidence of alignment of the SAT with the State’s academic content standards in the next peer review or the Department will take additional enforcement action.

Because the concerns related to test design and alignment have not been addressed over multiple peer reviews, the Department is continuing the condition on the State’s Title I grant award related to those components of the assessment system. To satisfy this condition, DDOE must submit satisfactory evidence to address the items identified in the enclosed list. The condition should remain until all of the evidence has been resubmitted and peer reviewed. If the outcome of the re-review by peers indicates full approval, then the condition should be removed. If adequate progress is not made, the Department may take additional action.

The specific list of items required for DDOE to submit is enclosed with this letter. Within 30 days of receipt of this letter, DDOE must provide to the Department a plan and timeline by which it will submit the additional documentation. If adequate progress is not made in providing this information, 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.

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: OESE.Assessment@ed.gov.

Sincerely,

/s/

Frank T. Brogan

Assistant Secretary for

Elementary and Secondary Education

Enclosures

cc: Theresa Bennett, Director, Office of Assessment

**Critical Elements Where Additional Evidence is Needed to Meet the Requirements for Delaware’s Assessment System**

| **Critical Element** | **Evidence Needed** |
| --- | --- |
| **1.3 – Required Assessments (all assessments)** | For the Delaware Communications Portfolio Summary (DCPS):   * Evidence that clarifies the use of the DCPS in the context of alternate assessments of alternate academic achievement standards (AA-AAAS). If it is used as part of the State’s assessment system, evidence will be required for this component for each critical element. |
| **2.1 – Test Design and Development** | For the SAT:   * Evidence that 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 academic content standards for the grade that is being assessed and includes processes to ensure that each academic assessment is tailored to the knowledge and skills included in the State’s academic content standards, reflects appropriate inclusion of challenging content, and requires complex demonstrations or applications of knowledge and skills (e.g., a plan and a timeline to address and remedy the alignment issues identified in the existing alignment studies, particularly in mathematics).   For DeSSA-Alt in science:   * Evidence of an overall test design and test blueprints that measure the depth and breadth of the State’s grade-level academic content standards in science (e.g., evidence that the test design adequately samples the essential elements in science).   For DCPS:   * Evidence that this assessment is not administered entirely through a portfolio. |
| **2.2 – Item Development** | For the SAT:   * Evidence of reasonable and technically sound procedures to develop and select items to assess student achievement based on the State’s academic content standards in terms of content and cognitive process, including higher-order thinking skills.   For DeSSA-Alt in science:   * Evidence that clarifies how the development and review process for Essential Element Concept Maps (EECMs) contributes to a technically sound test item development process. |
| **3.1 – Overall Validity, including Validity Based on Content** | For the SAT:   * Evidence requested in critical element 2.1 will satisfy this critical element.   For DeSSA-Alt in science:   * Evidence identified in critical element 2.1 relative to addressing the full range of the content standards for science. |
| **3.2 – Validity Based on Cognitive Processes** | For the SAT:   * Validity evidence that its assessments tap the intended cognitive processes appropriate for high school as represented in the State’s academic content standards. |
| **3.3 – Validity Based on Internal Structure** | For the SAT:   * Evidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State’s academic content standards on which the intended interpretations and uses of results are based. |
| **3.4 – Validity based on Other Variables** | For DeSSA-Alt in science:   * Evidence that the science tests are related as expected with similar variables (e.g., other measures of science achievement). |
| **4.1 – Reliability** | For DeSSA-Alt in science:   * Evidence of updated reliability for its assessments for the following measures of reliability for the student population overall and each student group once certain conditions have been met (e.g., expansion of the item pool, increase of number of items per testlet, increase in the number of linkage levels). |
| **4.2 – Fairness and accessibility** | For DeSSA-Alt in science:   * Evidence of reasonable and appropriate steps to ensure that the assessments are accessible to all students and fair across student groups in the design, development and analysis of its assessments. Such evidence may include the following:   + Once sufficient data exists, additional analysis by student subgroup to analyze test fairness.   + Once sufficient data exists, additional item analysis to examine the effects of certain stimuli (e.g., “fictionalized” science stories) and item response characteristics (response order) on test fairness.   + Specific criteria used for external test reviewers and test item writers regarding fairness and accessibility. |
| **4.7 – Technical Analysis and Ongoing Maintenance** | For DeSSA-Alt in science:   * Evidence of a plan to monitor the science test before, during, and after the inclusion of Phase II development items to the test item banks, including clear and technically sound criteria. |
| **5.1 – Procedures for Including Students with Disabilities (all assessments)** | For DeSSA-Alt:   * Evidence of parent-friendly and accessible guidance that provides clear explanations of the differences between assessments based on grade-level academic achievement standards and assessments based on alternate academic achievement standards, and the selection of appropriate accommodations for students with disabilities. * Evidence that the State:   + Monitors implementation of guidelines for IEP teams to apply in determining, on a case-by-case basis, which students with the most significant cognitive disabilities will be assessed based on alternate academic achievement standards, if applicable.   + Ensures that parents of students assessed with an AA-AAAS are informed that their child’s achievement will be measured based on alternate academic achievement standards; and   + Does not preclude a student with the most significant cognitive disabilities who takes an AA-AAAS from attempting to complete the requirements for a regular high school diploma. |
| **5.2 – Procedures for Including English Learners** | For the SAT:   * Documentation of guidance regarding the selection of appropriate accommodations for English learners. |
| **5.3 –Accommodations** | For the SAT:   * 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. * Evidence that children with disabilities and English learners are not denied the opportunity to participate in the assessment and any benefits from participation in the assessment. |
| **5.4 – Monitoring Test Administration for Special Populations** | For DeSSA-Alt:   * Evidence that the State ensures 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. |
| **6.2 – Achievement Standards-Setting** | For DeSSA-Alt in science:   * Evidence of a technically sound method and process that involved panelists with appropriate experience and expertise for setting its alternate academic achievement standards in science to ensure they are valid and reliable. |
| **6.3 – Challenging and Aligned Academic Achievement Standards** | For the SAT:   * Evidence of how the academic achievement standards are challenging and aligned with the State’s academic content standards such that a high school student who scores at the proficient or above level has mastered what students are expected to know and be able to do by the time they graduate from high school in order to succeed in college and the workforce.   For DeSSA-Alt:   * Evidence that the alternate academic achievement standards ensure that students are on track to pursue postsecondary education or employment, as specified in section 1111(b)(1)(E) of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act. DDOE should provide this evidence by December 31, 2020. |
| **6.4 – Reporting** | For the SAT:   * Evidence of reporting that facilitates appropriate interpretations and uses of results for students tested by parents, educators, State officials, policymakers and other stakeholders, and the public, including the production and delivery of individual student interpretive, descriptive, and diagnostic reports after each administration of its assessments that are available in alternate formats (e.g., Braille or large print) upon request and, to the extent practicable, in a native language that parents can understand   For DeSSA-Alt:   * Evidence that the State follows a process and timeline for delivering individual student reports to parents, teachers, and principals as soon as practicable after each test administration. * Evidence that the State provides individual student interpretive, descriptive, and diagnostic reports that:   + 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. |

U. S. Department of Education

**Peer Review of State Assessment Systems**

**August 2019 State 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 Academic Content Standards for All Students

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| **For academic content standards:**  The State formally adopted challenging academic content standards for all students in reading/language arts, mathematics and science and applies its academic content standards to all public schools and public school students in the State. | No additional evidence required per August 2018 letter to CSDE for SAT |  |
| Section 1.1 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 1.2 – Challenging Academic Content Standards

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| **For academic content standards:**  The State’s challenging academic content standards in reading/language arts, mathematics, and science are aligned with entrance requirements for credit-bearing coursework in the system of public higher education in the State and relevant State career and technical education standards. | No additional evidence required per August 2018 letter to CSDE for SAT |  |
| Section 1.2 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 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 annual general and alternate assessments aligned with **grade-level academic achievement standards** or alternate academic achievement standards in:   * Reading/language arts (R/LA) and mathematics in each of grades 3-8 and at least once in high school (grades 9-12); * Science at least once in each of three grade spans (3-5, 6-9 and 10-12).   AND  The State’s **academic content assessments** must be the same assessments administered to all students in the tested grades, with the following exceptions:   * Students with the most significant cognitive disabilities may take an alternate assessment aligned with alternate academic achievement standards. * A State may permit an LEA to administer a nationally recognized high school academic assessment in lieu of the State high school assessment if certain conditions are met. * A State that administers an end-of-course high school mathematics assessment may exempt an 8th grade student from the mathematics assessment typically administered in eighth grade and allow the student to take the State end-of-course mathematics test instead. * The Department may have approved the State, under the Innovative Assessment Demonstration Authority, to permit students in some LEAs to participate in a demonstration assessment system in lieu of participating in the State assessment. | No additional evidence required per August 2018 letter to CSDE for SAT |  |
| Section 1.3 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 1.4 – Policies for Including All Students in Assessments

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State requires the inclusion of all public elementary and secondary school students in its assessment system and clearly and consistently communicates this requirement to districts and schools.   * For students with disabilities, policies state that all students with disabilities in the State, including those children with disabilities publicly placed in private schools as a means of providing special education and related services, must be included in the assessment system; * For ELs: * Policies state that all ELs must be included in all aspects of the content assessment system, unless the State has chosen the statutory option for recently arrived ELs under which such ELs are exempt from one administration of its reading/ language arts assessment. * If a State has developed native language assessments for ELs in R/LA, ELs must be assessed in R/LA in English if they have been enrolled in U.S. schools for three or more consecutive years, except, if a district determines, on a case-by-case basis, that native language assessments would yield more accurate and reliable information, the district may assess a student with native language assessments for a period not to exceed two additional consecutive years. * If the State uses the flexibility for Native American language schools and programs: (1) the State provides the content assessment in the Native American language to all students in the school or program; (2) the State submits such content assessment for peer review as part of its State assessment system; and (3) the State continues to provide ELP assessments and services for ELs as required by law. The State must assess in English the students’ achievement in R/LA in high school. | No additional evidence required per August 2018 letter to CSDE for SAT |  |
| Section 1.4 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 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 **academic** 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. | State-specific; not applicable. |  |
| Section 1.5 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

# SECTION 2: ASSESSMENT SYSTEM OPERATIONS

## Critical Element 2.1 – Test Design and Development

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| 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 academic content** **standards** for the grade that is being assessed 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 grade-level academic content standards** and support the intended interpretations and uses of the results. * Processes to ensure that each academic assessment is tailored to the knowledge and skills included in **the State’s academic content standards,** reflects appropriate inclusion of challenging content, and requires complex demonstrations or applications of knowledge and skills (i.e., higher-order thinking skills). * 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. | **Evidence Document: 2.1.a SAT User Group Geometry Review** Discussion of math, specifically geometry, alignment took place at a meeting of state partners and College Board. The analysis resulting from this discussion is included to show the ongoing work to ensure the SAT is well aligned with state standards and classroom expectations.  SAT state partners have conducted independent alignment studies with UConn, HumRRO, and WebbAlign using SAT test forms and item data as a resource. We are submitting some examples of these documents to be clear that states using the SAT are not relying on vendor produced alignment reports to support future submissions by state’s using SAT.  **Evidence Documents: 2.1.b Connecticut SAT Alignment Report Final June 2016 2.1.c SAT Alignment Final Report\_DE 2.1.d SAT Alignment Final Report\_Maine 2.1.e WV DRAFT alignment report 12\_06\_2018**  **Evidence Document: 2.1.f SAT Assessment Reporting** Question Analysis screenshot referenced in the notes section. Score reporting resources allow teachers and students to see the content and state specific standards alignment of each item as part of the reporting process | Additional evidence requested for the SAT:  **A plan and a timeline to address the alignment issues identified in the existing alignment studies, particularly in mathematics.**  **2.1.a SAT User Group Geometry Review**  After a February 27, 2019 meeting with States,  College Board wrote a response indicating how the geometry content is selected for the SAT. Delaware, Michigan, Connecticut, New Hampshire, Maine, Illinois, Rhode Island “agreed that the alignment of the SAT Math Test to state standards is satisfactory and adequately meets their assessment needs” to which College Board provided a summary of the alignment study results, a summary of how the SAT assesses state high school mathematics standards, and a rationale for why the alignment is sufficient.  The rationale stated “there are questions derived from the CCSS high school geometry standards that will align to other SAT Math Test domains. Therefore, students who take the SAT Math Test may be exposed to questions that are aligned to the six CCSS conceptual categories under high school geometry.” The text is intended to provide evidence that the geometry content assessed on the SAT Math Test requires a deep understanding of existing high school geometry standards and is therefore assessing an acceptable breadth of the geometry state standards.  Page 2 states the independent alignment studies had different results. Even though the results confirm weak alignment to geometry and functions, SAT describes some of the noted gaps as “intended” (p. 3), which makes it sound as though the SAT has not changed the content but has studied it and defends the quality of the geometry items that **may** be presented to students. SAT does not forecast changing the content to better align to the CCSS.  **2.1.b Connecticut SAT Alignment Report Final June 2016**  The CT alignment study examined the SAT framework and the CT standards – items were not used for this alignment study. “Panelists were not asked to comment on the degree of match or the nature of the match.” Instead it seems that the number of panelists claiming a match was used to define strong, moderate, or weak match. Then the process for summarizing ratings of standard-dimension associations implied that panelists DID comment on the degree of match, and the summarization scheme may have produced inflated results.  In the Data Collection Procedures section, “we did not examine the extent to which the CT Core Standards are covered in the CT SAT School Day.” Furthermore, the policy decisions section #1 implies that the one-way alignment study sought to align the test framework to the standards, not to insure the breadth and depth of the standards were apparent in the test framework.  Mathematics table of results: introduction states that weak.no matches are not included. This seems to be an incomplete, possibly misleading representation of the results, if true. But then several rows in the tables that follow include No Match findings.   * Noted alignment gaps: Geometry – CO and Functions * Discussion indicates modest alignment for math. * Demographic information not supplied for panelists.   **2.1.c SAT Alignment Final Report\_DE**  Alignment study also cited flaws in the alignment, particularly for math, in that there are topics in the DE state standards that are not addressed by the SAT (e.g., gaps in content, mathematical practices, grade level, etc.). Report recommends that the state supplement the SAT in such areas to insure they assess the breadth and depth of the standards.  **2.1.d SAT Alignment Final Report\_Maine**  HUMRRO study for Maine, page 15:  “Because the blueprint is not identified in terms of CCSS standards or numbers of items, no statement about how well the test meets the blueprint using the CCSS can be made.” The criteria beginning on page 16 list alignment of items or item specs to standards and other features, but there is not a criterion to measure the assessment of the breadth of the standards.  The Special Study using the CCSSO Criteria evaluated whether the SAT (only one form) aligned to the content standards.  Alignment results indicate poor rigor alignment between the CCSS and the SAT.  Although HUMRRO report indicates that there is non alignment the states could address this in other ways, such as directing teachers to teach the missing concepts. However, there is no State mechanism for monitoring this.  This report also directs Maine to satisfy gaps in how the SAT measure the content standards using supplementary assessments in the state.  **2.1.e WV DRAFT alignment report 12\_06\_2018**  It is of interest to note that Reviewers comments were redacted.   * Table 3 indicates only about half of the ELA standards aligned to one or more test items on the two forms studied. * Table 11 notes several math items are aligned to middle school standards and not to the HS standards. * Table 12 indicates that only 16% of the standards are addressed by at least one test item. Both math forms had weak Range of Knowledge. * Table 13 indicates that MOST of the items on the math forms required major adjustments to achieve sufficient alignment to the standards. * Tables14 and 15 indicates that Geometry and higher concepts in Algebra did not align.   Summary: The available evidence does **not** justify the alignment of the SAT to the breadth and depth of the mathematics state standards or the depth of the state standards in ELA. Several of the cited reports advise states to incorporate additional assessments to complement the SAT to insure the breadth and depth of the standards are assessed. Evidence should be provided as requested. |
| Section 2.1 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * A plan and a timeline to address the alignment issues as identified in the existing alignment studies. | | |

## Critical Element 2.2 – Item 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 uses reasonable and technically sound procedures to develop and select items to:   * Assess student achievement based on the **State’s academic content standards** in terms of content and cognitive process, including higher-order thinking skills. | The following reviewer guides provide the relevant evidence for item development and selection as requested.  **Evidence Documents: 2.2.a SAT Suite Writing and Language TD Reviewer Guide 2.2.b SAT Suite Reading TD Reviewer Guide**  **2.2.c SAT Suite Test Development Guide for the Reading Test 2.2.d SAT Suite Test Development Guide for the Writing and Language Test 2.2.e SAT Suite Math TD Reviewer Guide** | Additional evidence requested for the SAT:  **Evidence of reasonable and technically sound procedures to develop and select items to assess student achievement based on the State's academic content standards in terms of content and cognitive process, including higher-order thinking skills.**  2.2.a – 2.2.e provide detailed information about test development and review, including item development and test assembly.  **2.2.c SAT Suite Test Development Guide for the Reading Test, pp. 26-37**  **p. 89 – item review criteria -**  **2.2.d SAT Suite Test Development Guide for the Writing and Language Test, pp. 31-40** Evidence submitted in this section did not indicate that the items were created based on any state’s academic content standards.  The evidence did not directly address cognitive processes; however, text complexity is addressed in the test development guides for ELA tests.  **3.2.a Overview of SAT Cognitive Lab Report**  The College Board partnered with HumRRO to conduct a Cognitive Lab Study of the SAT due September 2019 which may provide information on the cognitive process, including higher order thinking skills. This report should be submitted for review.  **2.1.d SAT Alignment Final Report\_Maine**  The HumRRO study submitted for section 2.1 pointed out some of the issues with DOK and reporting category alignment based on state standards.  P. 8 indicates that when comparing item DOK levels with the CB identified standards DOK levels, panelists’ rating demonstrate that the majority of items are either equal to or lower than the grade level standards. (first paragraph, last page.). Teachers also made comments that items were at lower level than CT standards.  P. 39 Item DOK distribution. No evidence provided about CB DOK classification – no blueprints; however, in the report, HumRRO must have known the DOK. What does the blueprint require and how are items assigned to position in blueprint?  What is the plan to address items that have lower DOK than the grade level standards?  Evidence not submitted to meet this component of the critical element.  **Evidence of guidelines for item writers with respect to fairness in the development and review process.**  **2.2.a SAT Suite Writing and Language TD Reviewer Guide 2.2.b SAT Suite Reading TD Reviewer Guide**  **2.2.e SAT Suite Math TD Reviewer Guide**  Test development reviewer guidelines for each content area describe the review process that includes both content and fairness reviews. Fairness reviews use both quantitative and qualitative methods. Fairness review criteria include diversity requirements, topics to avoid, portrayal, stereotyping, group identification, ethnocentrisms, regionalisms, language, testing context, and gender. The cited pages for these test development guides provide clear guidelines for ensuring fairness and diversity in passages, graphics, items, item responses.  Demographic information on the developers and reviewers could have been provided to enhance the fairness and diversity development and review process.  Available evidence justifies appropriate attention to fairness in item development and review phases.  **4.2.a SAT Suite Universal Design Principles**  This document addresses development of items for fairness. |
| Section 2.2 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence of reasonable and technically sound procedures to develop and select items to assess student achievement based on the State's academic content standards in terms of content and cognitive process, including higher-order thinking skills. * Final HumRRO SAT Cognitive Lab Report. | | |

## 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. | While some state partners using the SAT, notably CSDE as lead state for this response, did not receive requests for additional information here, we are including the following additional evidence based on the summary notes in our consortia submission from 2018.  Every testing site receives the following testing manual in time for state specific SAT school day training.  **Evidence Document: 2.3.a SAT-School Day Accommodated Testing Manual State-Provided** Pages 10-11 outline the preparation coordinators and proctors need to make prior to test day Pages 12-13 outline the materials needed for accommodated testing including readers Pages 15-16 includes “Plan for transcribing answers” Page 31 includes the specific process for administering readers and scribes Pages 35-84 for script associated with correct timing and accommodation – as indicated on the roster  Each state makes this training available through live, online, or webinar and tracks participation. The following is a script from the online training available in 2018-19 to all state SAT users as a common example to show that the training includes the specific  Each state makes this training available through live, online, or webinar and tracks participation. The following is a script from the online training available in 2018-19 to all state SAT users as a common example to show that the training includes the specific evidence required.  **Evidence Document: 2.3.b Online Test Day Training\_Script** (page references are to the pages # in the pdf document) Pages 3-7 provide the instructions for planning accommodating testing Pages 22-24 cover how to read the non-standard scripts included in the Accommodated Testing Manual including reinforcement of the policy to practice the scripts in advance of administration.  **Evidence Document: 2.3.c CSDE-Test-Day-Training-2272019** As a state specific example from CSDE, pages 45 & 47 respectively cover the Reader & Scribe policies and processes that were included in the mandatory SAT Coordinator training. Page 90 includes the policy to use the accommodated testing manual (Evidence 2.3.a) for training the staff responsible for administration.  **Evidence Document: 2.3.d SAT School Day Coordinator Manual State- provided** Pages 61-62 have an example of the staff agreement form that each educator responsible for materials and/or room proctor must sign. This allows College Board and state SAT users to have an auditable record that training was completed, and processes followed. | The following additional evidence is needed/provide brief rationale: **Provide evidence to address policies and procedures for standardized test administration that:**  **Has established and communicates to educators clear, thorough and consistent standardized procedures for the administration of its assessments,**  **specifically administration with accommodations, that is, read aloud and scribe;**  **2.3.a SAT-School Day Accommodated Testing Manual State-Provided.** Directions and scripts, as appropriate, for all allowable accommodations are included in this manual. Specific reader scripts are provided to readers and testing must be administered in a one-to-one setting. Directions for administering scribes are provided and this accommodation also must be administered in a one-to-one setting. Associated extend testing times are provided for these accommodations. Directions for transcribing student responses are included.  **Has established procedures to ensure that all individuals responsible for administering the State’s assessment receive training on the State’s established procedures for the administration of its assessments, including verification of training**  **2.3.b Online Test Day Training\_Script**  p. 34 Test Coordinators must complete online training and attain a passing score of 80%.  **2.3.c CSDE-Test-Day-Training-2272019**  p. 66 “All staff must participate in coordinator test training live or online . . .”  Training presentation slides and script reiterate information about accommodations that are in the accommodations manual.  **2.3.d SAT School Day Coordinator Manual State- provided, pp. 61-62.**  The cited pages only require test administrators, proctors, or monitors to agree they have read the manual. Although there is a statement on this document that Test Coordinators must ensure that test administrators are properly trained, there is no completion of training documentation provided in this evidence.  States should submit verification that training was implemented as described in SAT documents. |
| Section 2.3 Summary Statement | | |
| \_\_X\_ No additional evidence is required of SAT  \_\_X\_ The following additional evidence is needed from States:   * States must submit verification that training was implemented as described in SAT documents. | | |

## 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 academic assessments and the AA-AAAS. | State-specific; not applicable. |  |
| Section 2.4 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 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 all assessments in the State system: the general academic assessments and the AA-AAAS. | **Evidence Document:**  **2.3.c CSDE-Test-Day-Training-2272019**  As a state specific example from CSDE, this in-person training is required and tracked for every testing site. Pages 9-10 stress the importance of training and adherence to all security policies and processes outlined in the presentation and manuals provided. They also outline the key policies that have been most relevant to past SAT and other CT state assessments. Pages 105-109 review the handling of test materials. Page 121 covers seating  Pages 126-129 cover the handling of breaks and protection of test materials during administration Pages 138-139 cover the scripts and when/how to dismiss students  Pages 143-159 cover all of the procedures for coordinators to monitor testing and report any conduct that could violate state testing policy  **Evidence Document: 2.3.b Online Test Day Training\_Script** (page references are to the pages # in the pdf document) Key test security processes are covered throughout this training, which is available, and required unless changed by specific state policy, for every testing site. Though every part of administration is applicable to test security, pages 7-13 & 17-29 cover procedures most relevant to test security. | Additional evidence requested for the SAT:  **Evidence of annual training requirements for test security policies and procedures for Connecticut educators for all assessments.**  **2.3.b Online Test Day Training Script**  Page citations communicate clear security policies and procedures for administration of SAT.  **2.3.c CSDE-Test-Day-Training-2272019**  Page citations communicate clear security policies and procedures for administration of SAT. p. 67 states that Test Coordinators must “participate in mandatory Coordinator’s training – either live or online.”  Documentation describes test security safeguards. Although the comments from SAT claim that online training is required, the evidence does not make clear how completion of training is documented. Are there online data collected when a person completes the training?  The documentation offered by the SAT only requires test administrators, proctors, and monitors to agree they have received and read the manual.  Only Connecticut provided evidence for this component of the critical element. |
| Section 2.5 Summary Statement | | |
| \_\_X\_ No additional evidence is required from SAT  \_\_X\_ The following additional evidence is needed from States   * Annual training requirements for test security policies and procedures was conveyed in each state to appropriate staff. | | |

## 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. | No additional evidence required per August 2018 letter to CSDE for SAT |  |
| Section 2.6 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

# 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 academic assessments** measure the knowledge and skills specified in the State’s academic content standards, including:   * Documentation of adequate alignment between the State’s assessments and the academic content standards the assessments are designed to measure in terms of content (i.e., knowledge and process), , balance of content, and cognitive complexity; * Documentation that the assessments address the depth and breadth of the content standards; * If the State has adopted alternate academic achievement standards and administers alternate assessments aligned with those standards, the assessments show adequate alignment to the State’s academic content standards for the grade in which the student is enrolled in terms of content match (i.e., no unrelated content) and the breadth of content and cognitive complexity determined in test design to be appropriate for students with the most significant cognitive disabilities. | **Evidence Document: 2.1.a SAT User Group Geometry Review** Discussion of math, specifically geometry, alignment took place at a meeting of state partners and College Board. The analysis resulting from this discussion is included to show the ongoing work to ensure the SAT is well aligned with state standards and classroom expectations.  SAT state partners have conducted independent alignment studies with UConn, HumRRO, and WebbAlign using SAT test forms and item data as a resource. We are submitting some examples of these documents to be clear that states using the SAT are not relying on vendor produced alignment reports to support future submissions by state’s using SAT.  **Evidence Documents: 2.1.b Connecticut SAT Alignment Report Final June 2016 2.1.c SAT Alignment Final Report\_DE 2.1.d SAT Alignment Final Report\_Maine 2.1.e WV DRAFT alignment report 12\_06\_2018**  **Evidence Document: 2.1.f SAT Assessment Reporting** Question Analysis screenshot referenced in the notes section. Score reporting resources allow teachers and students to see the content and state specific standards alignment of each item as part of the reporting process | Additional evidence requested for the SAT:  **Evidence requested in Critical Element 2.1 will satisfy this Critical Element.**  Please refer to comments in 2.1  Summary: the available evidence does **not** justify the alignment of mathematics to the SAT to the breadth of the mathematics state standards. Several of the cited reports advise states to incorporate additional assessments to complement the SAT to insure the breadth of the standards are assessed. |
| Section 3.1 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * A plan and a timeline to address the alignment issues as identified in the existing alignment studies. | | |

## Critical Element 3.2 – Validity Based on Cognitive 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 cognitive processes** appropriate for each grade level as represented in the State’s academic content standards. | **Evidence Document: 3.2.a Overview of SAT Cognitive Lab Report** | **Additional evidence requested for the SAT: Validity evidence that its assessments tap the**  **intended cognitive processes appropriate for high school as represented in the State's academic content standards.**  **3.2.a Overview of SAT Cognitive Lab Report**  This memo provides a high-level overview of the project and updates as of June 2019. The College Board partnered with HumRRO to conduct a Cognitive Lab Study of the SAT. The purpose of the research study is to learn more about how test takers solve questions (i.e., test items) on the Evidence-based Reading and Writing (ERW) and Math sections of the SAT test. The evidence describes the research questions and sampling for a cognitive lab study. The interview questions and results were not provided. The evidence is insufficient to determine whether the SAT evokes the intended cognitive processes.  A final report should be submitted when it is complete. |
| Section 3.2 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * Validity evidence that its assessments tap the intended cognitive processes appropriate for high school as represented in the State's academic content 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 **academic content standards**. | **Evidence Documents: 3.3.a SAT Suite Technical Manual Appendixes (October)** Page 73 has a table with the section score characteristics  Pages 139-141 (table A-6.9.1 through A-6.9.3) has the raw score correlations for Reading, Writing & Language, and Math on three operational forms of the SAT  Pages 158-160 (table A-6.12.1 through A-6.12.3) has the scaled score correlations for Reading, Writing & Language, and Math on three operational forms of the SAT  **3.3.b StudentScoreReport\_Redacted**  This document shows how the section scores are reported to students & families in the most generic paper report from College Board. It describes the performance related to the SAT benchmarks; states provide supplemental reports for their own performance levels  **3.3.c Delaware parent report**  Provided as an example of how one state provides the intended interpretations in the context of their state content standards and performance descriptors. **3.3.d skills insight sat suite**  Provided as evidence of how College Board presents the students performance in each test section in the context of academic skills. Educators have a map of these skills to specific state standards available to them, dynamically, through online score reporting tools. | Additional evidence requested for the SAT:  **Evidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State's academic content standards on which the intended interpretations and uses of results are based.**  **2.1.c. SAT Alignment Final Report\_DE**  p. 46. “However, reporting the subscores does not provide additional information, statistically, above and beyond the information offered through the total score used alone. Thus, caution should be used in placing too much emphasis on or over-interpreting what the subscores mean regarding strengths and weaknesses of a student. This cautionary message needs to be disseminated down to principals, teachers, and anyone who may use the subscores; the subscores may be misleading if used alone.”  **3.3.a SAT Suite Technical Manual Appendixes (October)**  Provides evidence that subscores are correlated with each other as expected (math subscores with each other, ELA subscores with each other).  The HUMRRO study illuminated some of the issues with the subscores, particularly within the math section. Also, the underlying issues with these validity critical elements are aligned to and measure “state’s academic standards” which the assessment does not appear to be well aligned.  **3.3.b StudentScoreReport\_Redacted**  SAT score report is based on the SAT framework.  The comment provided in the index by SAT implies that the score reports published by the SAT are based on the SAT’s framework. This would imply that states are left with the task of explaining what scores mean in terms of their state standards.  **3.3.c Delaware parent report**  This report is a State-specific (Delaware) example of how results and skills are described and includes a scale of the Delaware Achievement Levels in relation to the student’s SAT scores.  DE report is based on the SAT framework with a section that breaks up the SAT scale into proficiency categories. No correspondence from the SAT framework to the DE standards is offered in the report.  **3.3.d skills insight sat suite**  SAT documents proficiency categories with descriptors based on specific skills and concepts. The comment in the index implies that educators have access to a mapping from the SAT framework to their state standards in the online reporting system; however, this map was not provided in the evidence and apparently is not available to students or parents.  The evidence supplied by the SAT does not illustrate how the reporting structures of its assessments are consistent with the sub-domain structures of the state standards.  The SAT framework does not correspond well to the CCSS or state standards framework. Domains do not map to CCSS domains. Such mapping is available to teachers, but not parents and students. Inferences cannot be made about a student’s knowledge in relation to CCSS based on SAT scores. Skills are described for different score ranges.  However, all of this information is generic and not state-specific.  The evidence provided illustrates how well the test can predict college and career readiness. States are using standards that guide instruction to help students become college and career ready.  However, the evidence submitted does not provide any information on how well students have mastered the state Standards. There is limited evidence that “State Standards” are being measured by the assessment but the overall notion of college and career readiness is. This is a critical point because this assessment can measure college and career readiness but it is not measuring and providing information on how well students mastered the state standards. As the evidence in this peer review has indicated, these are indeed two separate but equally important measurable aspects that have not been integrated into the assessment. |
| Section 3.3 Summary Statement | | |
| \_\_X\_ The following additional evidence that   * Scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State's academic content 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. | No additional evidence required per August 2018 letter to CSDE for SAT |  |
| Section 3.4 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

# 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** |
| --- | --- | --- |
| 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; * 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 **a student’s academic achievement**. | **Evidence Documents: 4.1.b Delaware 2018 SAT SWD TA Report** This document has analysis for students that used testing accommodations during the 2018 SAT administration  The following documents contain reliability data for students with disabilities, English learners, and students who received accommodations. **4.1.c 2016 Michigan SAT Subgroup Reliability 4.1.d 2018 Connecticut SAT Subgroup Reliability 4.1.e 2018 DE SAT Subgroup Reliability** | **Additional evidence requested for the SAT: Reliability data for students with disabilities,**  **English learners, and students who received accommodations.**  **4.1.b Delaware 2018 SAT SWD TA Report**  This document has reliability data for students who used testing accommodations during the 2018 SAT administration. Delaware provided reliabilities for test takers who took test with accommodations and for subgroups, such as gender, race/ethnicity, ELs.  The evidence supplies data and analysis for disaggregated groups of students who took the SAT with accommodations. There appears to be reasonable reliability within this group; however, the performance of this group was low as a whole. No information is supplied that compares this group to the general population of students in terms of their performance. If the TA group’s performance is substantially lower than the general population, what does that say, if anything about the appropriateness of the SAT for these students and the information derived from their scores?  Evidence provided in the following reports is state specific; thus it cannot be evaluated overall.  **4.1.c 2016 Michigan SAT Subgroup Reliability**  Michigan (4.1.c) provided reliabilities by gender, race/ethnicity, ELs, and by accommodations.  **4.1.d 2018 Connecticut SAT Subgroup Reliability**  Connecticut (4.1.d) provided reliabilities by gender, race/ethnicity, ELs, and SWDs, but not according to accommodations.  **4.1.e 2018 DE SAT Subgroup Reliability**  These reports include ELs and students who received accommodations.  State reports of reliability by subgroups indicate lower reliabilities for blacks, Hispanics, ELLs, and SWDs/TAs.  The CB provided the reliability for three subgroups requested. However, the reliability evidence for ELS, students with disabilities and students with disabilities who receive accommodations demonstrates a wide range of reliabilities in comparison with other subgroups. Do states consider this adequate reliability evidence? What concerns do states have about test score interpretations in light of these variable reliabilities? What plans do states have to address the difference in reliabilities across groups? |
| Section 4.1 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence of adequate reliability for students with disabilities, English learners, and students who received accommodations. | | |

## 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 academic assessments,*** assessments should be developed, to the extent practicable, using the principles of universal design for learning (UDL) (see definition[[1]](#footnote-1)).  **For academic content assessments**, the State has taken reasonable and appropriate steps to ensure that its assessments are accessible to all students and fair across student groups in their design, development and analysis. | **Evidence Documents: 4.1.b Delaware 2018 SAT SWD TA Report** This document has analysis for students that used testing accommodations during the 2018 SAT administration **4.1.c 2016 Michigan SAT Subgroup Reliability 4.1.d 2018 CT SAT Subgroup Reliability 4.1.e 2018 DE SAT Subgroup Reliability**  **4.2.a SAT Suite Universal Design Principles Universal Design Principles** This document details how the SAT Suite of Assessments is developed according to the following five principles of universal design defined by Thompson, Johnstone, and Thurlow (2002) | Additional evidence requested for the SAT:  **Evidence that the assessment is fair across student groups in the design, development and**  **analysis of its assessments, including data related to students with disabilities and ELs.**  **4.1.b Delaware 2018 SAT SWD TA Report**  This document has analysis for students that used testing accommodations during the 2018 SAT administration. However, there is no discussion of the implications of the analyses related to the fairness of the assessment for students with disabilities and ELs in relation to students without disabilities and who are not ELs.  **4.1.c 2016 Michigan SAT Subgroup Reliability**  **4.1.d 2018 CT SAT Subgroup Reliability 4.1.e 2018 DE SAT Subgroup Reliability**  As noted above, this evidence reveals lower scores and lower reliabilities for particular subgroups. According to 4.7.b. the Delaware mean scores were up to a half of a SD higher for the general population than the means reported in the executive summary of 4.1.b for traditionally marginalized subgroups of students (Math 404, ELA 424), and many of these students are not completing sections of the test.  The state reports indicate that reliabilities are higher for students who are white.  No discussion of the reliability scores is provided.  **Evidence that the State supports and enhances the accessibility of the assessments through appropriate accommodations for students with disabilities, and, to the extent practicable, by incorporating principles of universal design for learning (UDL) (section 1l 1l(b)(2)(B)(xiii) of the ESEA, as amended by the ESSA).**  **4.2.a SAT Suite Universal Design Principles Universal Design Principles**  pp. 8-11 indicate the accommodations that may be used and that result in college-reportable scores.  pp. 2-3 list five universal design principles that are reportedly used to design test items and support material.  This document includes descriptions of multiple rounds of reviews for content/bias/sensitivity, and fairness.  Evidence was provided that test development processes attended to fairness. Sufficient evidence was not provided to show that student test responses for students with disabilities and ELs indicated fairness.  Evidence is needed that the states have considered the subgroup reliabilities and other score analyses in relation to fairness issues. |
| Section 4.2 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence is needed that the states have considered the subgroup reliabilities and other score analyses in relation to fairness issues. | | |

## 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 **academic assessments**, including performance for high- and low-achieving students. | No additional evidence required per August 2018 letter to CSDE for SAT |  |
| Section 4.3 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 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 that are designed to produce reliable and meaningful results, facilitate valid score interpretations, and report assessment results in terms of the State’s **academic achievement standards**. | No additional evidence required per August 2018 letter to CSDE for SAT |  |
| Section 4.4 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 4.5 – Multiple Assessment Forms

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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 administers multiple forms of **academic assessments** within a content area and grade level, within or across school years, the State ensures that all forms adequately represent the State’s **academic content standards** and yield consistent score interpretations such that the forms are comparable within and across school years. | No additional evidence required per August 2018 letter to CSDE for SAT |  |
| Section 4.5 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 4.6 – Multiple Versions of an Assessment

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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 administers any of its assessments in multiple versions within a subject area (e.g., online versus paper-based delivery; **or a native language version of the academic content assessment**), 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. | No additional evidence required per August 2018 letter to CSDE for SAT |  |
| Section 4.6 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 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. | **Evidence Documents: 4.7.a Connecticut 2018 TA Report 4.7.b Delaware 2018 SAT Total Group TA Report 4.7.c CSDE Debrief Meeting Notes 051818\_SAT** | Additional evidence requested for the SAT:  **Evidence of a system for monitoring and 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.**  **4.7.a Connecticut 2018 TA Report 4.7.b Delaware 2018 SAT Total Group TA Report**  These reports do not indicate that these are used for monitoring, maintaining, and improving the quality of the assessment system.  Documents provide states with appropriate data for judging the performance of their students and subgroups of students on the SAT, which is useful information for states to consider in selecting or developing their assessment systems.  None of the evidence provided suggested how the SAT developers plan to maintain or improve the quality of the SAT. The sample reports detail information about the recent test administration, however, a process to improve or make changes, and technically sound criteria for analysis of the assessment are not included. This seems to meet monitoring component, but not maintaining and improving the assessment, e.g., retiring items or lifespan of a test form, revising blueprint, subgroup analyses, etc.  **4.7.c CSDE Debrief Meeting Notes 051818\_SAT**  The notes from this meeting indicate an opportunity for district test coordinators to provide feedback about various test operational procedures. This feedback, while important to smooth operational procedures, do not appear to be related to improving the quality of the assessment system. |
| Section 4.7 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * System for 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. | | |

# 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 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.  If a State adopts alternate academic achievement standards for students with the most significant cognitive disabilities and administers an alternate assessment aligned with those standards under ESEA section 1111(b)(1)(E) and (b)(2)(D), respectively, the State must:   * Establish guidelines for determining whether to assess a student with an AA-AAAS, including:   + A State definition of “students with the most significant cognitive disabilities” that addresses factors related to cognitive functioning and adaptive behavior; * Provide information for IEP Teams to inform decisions about student assessments that:   + Provides a clear explanation of the differences between assessments aligned with grade-level academic achievement standards and those aligned with alternate academic achievement standards, including any effects of State and local policies on a student's education resulting from taking an AA-AAAS, such as how participation in such assessments may delay or otherwise affect the student from completing the requirements for a regular high school diploma; * Ensure that parents of students assessed with an AA-AAAS are informed that their child’s achievement will be measured based on alternate academic achievement standards; * Not preclude a student with the most significant cognitive disabilities who takes an AA-AAAS from attempting to complete the requirements for a regular high school diploma; and * Promote, consistent with requirements under the IDEA, the involvement and progress of students with the most significant cognitive disabilities in the general education curriculum that is based on the State’s academic content standards for the grade in which the student is enrolled; and * Develop, disseminate information on, and promote the use of appropriate accommodations to ensure that a student with the most significant cognitive disabilities who does not take an AA-AAAS participates in academic instruction and assessments for the grade in which the student is enrolled. * The State has in place and monitors implementation of guidelines for IEP teams to apply in determining, on a case-by-case basis, which students with the most significant cognitive disabilities will be assessed based on alternate academic achievement standards, if applicable. Such guidelines must be developed in accordance with 34 CFR § 200.6(d).[[2]](#footnote-2) | **Evidence Documents: 5.1.a Test Administration Supplement Final** Pages 7-8 identify policies for accommodations and supports  As an example of how this policy is presented by states to the testing site coordinators:  **2.3.c CSDE-Test-Day-Training-2272019** Pages 17-21 cover changes for the 2018-19 administration; these specific slides show how the policies have been updated since the original peer review submission  Pages 37-57 cover the processes necessary to register a student’s accommodations; all students are provided the opportunity to participate and have a college reportable score under these policies | Additional evidence requested for the SAT:  **Evidence of the State's process for ensuring that students with disabilities are included in the SAT with clear guidelines for accommodations and the receipt of college-reportable scores.**  Peers commend the College Board for increasing the number of accommodations for students with disabilities.  **5.1.a Test Administration Supplement Final**  pp. 7-8. **“**In adhering to the practice of standardization and in keeping with the standards, all accommodated administrations are designed to be comparable to the standard administration (AERA, APA, and NCME, 2014).”    **2.3.a SAT-School Day Accommodated Testing Manual State-Provided**  pp. 12-13 Lists of allowable accommodations  p. 14 CB provides the procedure to follow to ensure that a student with an accommodation receives a reportable college score.  p. 18 There is a process whereby states can request college-reportable scores for unique accommodations requested for a student. “State-allowed accommodations (SAAs) may be available depending on your state. If available, SAAs allow students to use defined accommodations or supports; however, they may not result in college- or scholarship-reportable scores.  **2.3.c CSDE-Test-Day-Training-2272019**  p. 37 lists accommodations that are “Used for state accountability system and college admission.”  Evidence that students with disabilities are not denied the opportunity to participate in the assessment and any benefits from participation in the assessment.  Since this is a CT document, it is not clear if this policy applies to all states in this consortium.  It is recommended that States review the accommodation guidelines for college-reportable scores with IEP teams. |
| Section 5.1 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed from States   * States follow procedures to request SAA be college-reportable. | | |

## Critical Element 5.2 – Procedures for Including English Learners in Academic Content Assessments

| **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 ELs in public elementary and secondary schools in the State’s academic content assessments and clearly communicates this information to districts, schools, teachers, and parents, including, at a minimum:   * Procedures for determining whether an EL should be assessed with a linguistic accommodation(s); * Information on accessibility tools and features available to all students and assessment accommodations available for ELs;   + Assistance regarding selection of appropriate linguistic accommodations for ELs, including to the extent practicable, assessments in the language most likely to yield accurate and reliable information on what those students know and can do to determine the students’ mastery of skills in academic content areas until the students have achieved English language proficiency. | **Evidence Document: 2.3.a SAT-School Day Accommodated Testing Manual State-Provided** Policy from the College Board state user accommodated manual is provided to show College Board policy and procedures are consistent with requirements. This manual, or a state specific one with similar content, is sent to every testing site, weeks before testing, so staff can be trained. Page 8 includes an important note about additional time support for EL students and the supports listed for planning purposes Page 10 covers the process to “ensure you have plans in place for testing students with accommodations and EL supports” and the procedure to register them in the system for reporting to the state  **2.3.c CSDE-Test-Day-Training-2272019**  This presentation from a required training, publication in the state’s assessment newsletter, and inclusion on the states Web site is typical of SAT state users’ communication process. Pages 9-13 cover the new processes for accommodation eligibility and selection Pages 37-52 cover the procedures for EL participation with supports | Additional evidence requested for the SAT:  **Evidence of communicating this information to districts, schools, teachers, and parents, including, at a minimum:**  **o Procedures for determining whether an English learner should be assessed with accommodation(s); o Guidance regarding selection of appropriate accommodations for English learners.**  Peers commend the College Board for increasing the number of supports for English Learners.  **2.3.a SAT-School Day Accommodated Testing Manual State-Provided**  p. 8 **“***Students using the 50% extended time EL support receive extended time on the entire assessment.”*  p. 10 **“**Meet with your test coordinator to ensure you have plans in place for testing students with accommodations and EL supports.”  pp. 12-14 Lists of allowable accommodations  **5.1.a Test Administration Supplement Final**  p. 8. EL supports include:  • Translated test directions  • Use of bilingual word-to-word glossaries  • 50% extended testing time  EL students who use supports during SAT School Day will receive scores they can send to colleges.  Students who meet the following criteria at the time of testing can use EL supports: • They are enrolled in an elementary or secondary school in the U.S. or U.S. territories.  • They are an English learner as defined by their state or by federal policy. • They use the same supports in class or for other assessments.  2.3.c CSDE-Test-Day-Training-2272019.  pp. 49, 52. EL students who use 50% extended time will receive a college reportable score.  **Evidence that English learners are not denied the opportunity to participate in the assessment and any benefits from participation in the assessment.**  See evidence cited above which supports this component of the critical element. |
| Section 5.2 Summary Statement | | |
| \_X\_\_ No additional evidence is required | | |

## 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, such as, interoperability with, and ability to use, assistive technology, are available to measure the **academic achievement** of students with disabilities. * 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. | **Evidence Documents: 2.3.a SAT-School Day Accommodated Testing Manual State-Provided** Policy from College Board state user accommodated testing manual is provided to show College Board policy and procedures are consistent with requirements. This manual, or a state specific one with similar content, is sent to every testing site, weeks before testing, so staff can be trained. Page 8 includes a table matching the accommodations with testing conditions so educators can make informed choices about the most appropriate choice for each student  Pages 12-13 cover the special materials required for each accommodation so educators can make informed choices about the most appropriate choice for each student  **2.3.c CSDE-Test-Day-Training-2272019**  This presentation from a required training, publication in the state’s assessment newsletter, and inclusion on the states Web site is typical of SAT state user’s communication process. Pages 37-57 cover the processes necessary to select and register the most appropriate accommodations for each student; all students are provided the opportunity to participate and have a college reportable score under these policies | Additional evidence requested for the SAT:  **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.**  Evidence as described in USED Assessment Peer Review Process, p 64, is not provided.  SAT supplies states with appropriate state-level reports to show how students with and without accommodations perform on the SAT. However, none of the evidence supplied for this review showed how states or SAT officials compare results of students receiving and not receiving accommodations performed on the SAT.  No evidence justifies how states or the College Board conclude that assigned accommodations were effective or not for meeting students’ needs or for interpreting results.  **2.3.a SAT-School Day Accommodated Testing Manual State-Provided,** p. 8. Information about accommodations allowed. Notes from College Board about how exceptions are handled – but no real documentation.  **2.3.c CSDE Test Day Training** addresses more procedural details, but not how accommodations are appropriate and effective.  **As noted above in elements 5.1 and 5.2, evidence that children with disabilities are not denied the opportunity to participate in the assessment and any benefits from participation in the assessment (evidence submitted for element 5.1 will address this concern).** |
| Section 5.3 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * 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. | | |

## 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 academic content assessments and AA-AAAS. | **Evidence Document: 5.4.a 2017\_18 SAT State Accountability Layout** This file provides the layout of the final score reporting file for a state’s SAT administration. The SAT Data File Layout provides each element with values and comments; rows 22 & 50-53 allow states to easily monitor performance, access to accommodations, and participation. **2.3.c CSDE-Test-Day-Training-2272019** Pages 17-21 cover changes for the 2018-19 administration; these specific slides show how the policies have been updated since the original peer review submission Pages 37-57 cover the processes necessary to register a student’s accommodations; all students are provided the opportunity to participate and have a college reportable score under these policies. These records are reported along with each student’s testing record. | Additional evidence requested for the SAT:  Evidence that it monitors test administration to ensure that appropriate assessments, with or without appropriate accommodations, are selected for students with disabilities under IDEA, students covered by Section 504, and English learners so that they are appropriately included in assessments and receive accommodations that are:   * Consistent with the State's policies for accommodations; o 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; o Consistent with the assessment accommodations identified by a student's individualized education programs team or 504 team for students with disabilities, or another process for an English learner; and * Administered with fidelity to test   administration procedures.  **5.4.a 2017\_18 SAT State Accountability Layout**  This final score reporting file does provide rows to indicate student name and accommodations used, SAA indicator, Accommodation type used, and college reportable indicator. However, this evidence does not indicate how schools ensure that students actually receive the accommodations they are supposed to use for testing.  States need to provide evidence that this file is used by states to monitor the components of the critical element cited above.  There is no indication that accommodation administration is monitored for fidelity of test administration procedures.  2.3.c CSDE-Test-Day-Training-2272019. There is a slide that indicates monitoring will take place during test administration. However, there is nothing in the Post-administration Test Analysis report or other submitted information to verify this statement.  No State Education Agency or CB monitoring documentation is provided for before, during, or post administration.  States should provide evidence that all components of this requested evidence are included, e.g., in a monitoring protocol. |
| Section 5.4 Summary Statement | | |
| \_\_X\_ No additional evidence is required from SAT  \_\_X\_ The following additional evidence is needed from States:  States monitor test administration to ensure that appropriate assessments, with or without appropriate accommodations, are selected for students with disabilities under IDEA, students covered by Section 504, and English learners 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 individualized education programs team or 504 team for students with disabilities, or another process for an English learner; and * Administered with fidelity to test   administration procedures. | | |

# SECTION 6: ACADEMIC ACHIEVEMENT STANDARDS AND REPORTING

## Critical Element 6.1 – State Adoption of Academic 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 academic content standards:**  The State formally adopted **challenging academic achievement standards** in reading/language arts, mathematics, and science for all students, specifically:   * The State formally adopted academic achievement standards in the required tested grades and, at its option, alternate academic achievement standards for students with the most significant cognitive disabilities; * The State applies its academic achievement standards to all public elementary and secondary school students enrolled in the grade to which they apply, with the exception of students with the most significant cognitive disabilities to whom alternate academic achievement standards may apply;   The State’s academic achievement standards and, as applicable, alternate academic achievement standards, include: (1) at least three levels of achievement, with two for high achievement and a third for lower achievement; (2) descriptions of the competencies associated with each achievement level; and (3) achievement scores that differentiate among the achievement levels. | No additional evidence required per August 2018 letter to CSDE for SAT |  |
| Section 6.1 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 6.2 – 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:   * **Academic achievement standards and, as applicable, alternate academic achievement standards**. | No additional evidence required per August 2018 letter to CSDE for SAT |  |
| Section 6.2 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 6.3 – Challenging and Aligned Academic Achievement Standards

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| **For academic achievement standards:**  The State’s academic achievement standards are challenging and aligned with the State’s academic content standards and with entrance requirements for credit-bearing coursework in the system of public higher education in the State and relevant State career and technical education standards such that a student who scores at the proficient or above level has mastered what students are expected to know and be able to do by the time they graduate from high school in order to succeed in college and the workforce.  If the State has adopted alternate academic achievement standards for students with the most significant cognitive disabilities, the alternate academic achievement standards (1) are aligned with the State’s challenging academic content standards for the grade in which a student is enrolled; (2) promote access to the general curriculum consistent with the IDEA; (3) reflect professional judgment as to the highest possible standards achievable for such students; (4) are designated in the IEP for each student for whom alternate academic achievement standards apply; and (5) are aligned to ensure that a student who meets the alternate academic achievement standards is on track to pursue postsecondary education or competitive integrated employment. | States that chose to use the SAT as their high school assessment for Reading, Writing, and Mathematics standards have high school content standards that are explicitly aligned with college and career readiness. The standard setting process for each state varies, but the evidence of predictive validity between the SAT and post-secondary outcomes is critical to each process. The following documents can provide evidence of that validity and the points in the SAT scale that predict college and career readiness.  **Evidence Documents: 6.3.a National sat validity study** While the whole document is relevant, the abstract (page 4) and the conclusions (page 20) provide the bottom-line evidence for this element.  **6.3.b SAT score relationships with CTE program performance** | Additional evidence requested for the SAT:  **Evidence of how the academic achievement standards are challenging and aligned with the State's academic content standards such that a high school student who scores at the proficient or above level has mastered what students are expected to know and be able to do by the time they graduate from high school in order to succeed in college and the workforce.**  **6.3.a National SAT Validity Study**  **6.3.b SAT score relationships with CTE program performance**  Evidence provided by College Board demonstrates that level 3 scores and higher relate to being “college and career ready,” in general, but not necessarily aligned with state achievement standards.  The evidence provided illustrates how well the test can predict college and career readiness. States are using standards that guide instruction to help students become college and career ready. However, the evidence submitted does not provide any information on how well students have mastered the state Standards. There is limited evidence that “State Standards” are being measured by the assessment but the overall notion of college readiness is. This is a critical point because this assessment can measure college readiness but it is not measuring and providing information on how well students have mastered the state standards. As the evidence in this peer review has indicated, these are indeed two separate but equally important measurable aspects that have not been integrated into the assessment.  Although the evidence confirms predictive validity of the  SAT as a predictor of college success, the available evidence does not make explicit how the achievement standards of the SAT align to the states’ academic content standards. |
| Section 6.3 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * Evidence of how the academic achievement standards are challenging and aligned with the State's academic content standards such that a high school student who scores at the proficient or above level has mastered what students are expected to know and be able to do by the time they graduate from high school. | | |

## 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 **student academic achievement for all students and each student group at each achievement level[[3]](#footnote-3)**  For **academic content assessments**, the State reports assessment results, including itemized score analyses, to districts and schools so that parents, teachers, principals, and administrators can interpret the results and address the **specific academic needs of students**, and the State also provides interpretive guides to support appropriate uses of the assessment results.   * The State provides for the production and delivery of individual student interpretive, descriptive, and diagnostic reports after each administration of its academic content assessments that:   + Provide valid and reliable information regarding a **student’s academic achievement**;   + Report the **student’s academic achievement** in terms of the State’s grade-level academic achievement standards;   + Provide information to help parents, teachers, and principals interpret the test results and address the specific **academic needs of students**;   + 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. * The State follows a process and timeline for delivering individual student reports to parents, teachers, and principals as soon as practicable after each test administration. | Individual score reports are delivered by College Board to every student tested within weeks of test administration.  **Evidence Documents: 6.4.a understanding sat scores 6.4.b understanding sat scores Spanish**  These documents describe the key elements of the online score reports. Students also have access to video tutorials and other help resources to be able to access and understand their results.  **5.4.a 2017\_18 SAT State Accountability Layout**  This file provides the layout of the final score reporting file for a state’s SAT administration. It is delivered in June or early July to all state SAT users with one row per student identified as eligible/required to participate in the SAT administration. The SAT Data File Layout tab provides each element with values and comments; student name, school, and other key information (i.e., SSID in row 22) is reported back to the state’s assessment team in the exact format it was provided to identify the student for testing. This is especially important for timely turn-around of this report for state purposes.  **3.3.d skills insight sat suite**  Provided as evidence of how College Board presents the students performance in each test section in the context of academic skills. Every student gets this report as part of an individual score report. Educators have a map of these skills to specific state standards available to them, dynamically, through online score reporting tools. | Additional evidence requested for the SAT:  **Evidence of reporting that facilitates timely,**  **appropriate, credible, and defensible interpretations and uses of results for students tested by parents, educators, State officials, policymakers and other stakeholders, and the public, including:**  **1. The production and delivery of individual student interpretive, descriptive, and diagnostic reports after each administration of its assessments that:**  **1.a. Report the student's achievement in terms of the State's grade-level academic achievement standards (including performance-level descriptors);**  **3.3.c Delaware parent report**  Includes a sample report based on the state’s achievement levels and broad performance-level descriptors.  **6.4.a Understanding SAT Scores**. “The SAT measures the skills and knowledge that research shows are the most important for success in college and career.” There is no mention of student achievement in terms of the State’s grade-level academic achievement standards.  SAT Reports do not convey student achievement in terms of the state standards. Connections between students’ achievement of particular skills and the state standards are only directly available to teachers, who have access to a mapping between the SAT framework and the state standards.  That said, it appears that teachers have to do the work of interpreting each student’s score in terms of the standards. The evidence indicates that individual reports are interpretive and descriptive of students’ overall domain competence, according to the SAT framework. The evidence does not indicate that individual reports may be easily interpreted in terms of the state standards nor may they assist in diagnosing students’ particular strengths or weaknesses.  Some state reports include four achievement levels with performance descriptors per domain as a reference for students and parents to interpret individual scores. However, such information is insufficient for identifying how to support student continued progress.  **3.3.d Skills Insight SAT Suite**  Provides lists of skills and concepts associated with each score range. These lists are not presented in terms of the state content standards. Furthermore, the lists represent typically the skills that a particular score indicates, not the skills a particular student has or lacks based on their item responses. This document does not refer to student’s achievement in terms of the State’s grade-level academic achievement standards.  States must provide this evidence.  **1.b Are available in alternate formats (e.g., Braille or large print) upon request and, to the extent practicable, in a native language that parents can understand; and**  **6.4.a Understanding SAT Scores**  This document indicates that students have access to  videos and other resources to help them understand their scores, but there is no mention of alternate formats. Not everyone has internet access.  **6.4.b Understanding SAT Scores Spanish**  The actual student report is in English although other information is in Spanish.  It is not indicated in the evidence that reports are available in other languages or are translated orally to parents/guardians upon request.  There is no information on availability of alternate formats of the reports available upon request.  It is not clear if all students and parents receive the skills insight and how do they receive it if it is only online access? Not all families have online access and not all students have SAT access. Although the CB provides a list of students without SAT access so the school may assist in setting this up, there is no verification process to ensure that the student has online access.  **2. A process and timeline for delivering individual student reports to parents, teachers, and principals as soon as practicable after each test administration**    **5.4.a 2017\_18 SAT State Accountability Layout**  This data file is provided to state SAT users in June or early July with one row per student identified as eligible/required to participate in the SAT administration. This file provides the layout of the final score reporting file for a state’s SAT administration. However, no information is provided related to how States use this data file to report or deliver scores to parents, teachers, and principals.  Although SAT asserts that they deliver individual score reports within 4 weeks of the test administration date, whether the state processes reports for more time before sending them to families is not available for review with this evidence.  The submission states that “Individual score reports are delivered by College Board to every student tested within weeks of test administration.” However, there is no process or timeline for delivery to parents of their child’s individual report. CB may have the information available online within 4 weeks, but that does not ensure parental delivery.  Evidence of a process and timeline is needed from states that student reports are provided to teachers, principals and parents as soon as practicable. |
| Section 6.4 Summary Statement | | |
| \_\_X\_ No additional evidence is required of SAT  \_\_X\_ The following additional evidence is needed:  States must provide   * Report the student's achievement in terms of the State's grade-level academic achievement standards (including performance-level descriptors) (except Delaware-already submitted); * Alternate formats are available (e.g., Braille or large print) upon request and, to the extent practicable, in a native language that parents can understand * Evidence of process and timeline is needed from states that student reports are provided to teachers, principals and parents as soon as practicable. | | |

# SECTION 7: LOCALLY SELECTED NATIONALLY RECOGNIZED HIGH SCHOOL ACADEMIC ASSESSMENTS

(if applicable; evidence for this section would be submitted in ADDITION to evidence for sections 1 through 6)

## Critical Element 7.1 – State Procedures for the Use of Locally Selected, Nationally Recognized High School Academic Assessments

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| The State has established technical criteria to use in its review of any submission of a locally selected, nationally recognized high school academic assessment. The State has completed this review using its established technical criteria and has found the assessment meets its criteria **prior to** submitting for the Department’s assessment peer review.  The State’s technical criteria include a determination that the assessment:   * Is aligned with the challenging State academic standards; and * Addresses the depth and breadth of those standards.   AND | N/A | N/A |
| The State has procedures in place to ensure that a district that chooses to use a nationally recognized high school academic assessment administers the same assessment to all high school students in the district except for students with the most significant cognitive disabilities who may be assessed with an AA-AAAS. |  |  |
| AND  The technical criteria established by the State in reviewing a locally selected, nationally recognized high school academic assessment must ensure that the use of appropriate accommodations does not deny a student with a disability or an EL—   * The opportunity to participate in the assessment; and * Any of the benefits from participation in the assessment that are afforded to students without disabilities or students who are not ELs. |  |  |
| Section 7.1 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

## Element 7.2 –State Monitoring of Districts Regarding the Use of Locally Selected, Nationally Recognized High School Academic Assessments

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| The State must have procedures in place to ensure that:  **Before** a district requests approval from the State to use a nationally recognized high school academic assessment, the district notifies all parents of high school students it serves—   * That the district intends to request approval from the State to use a nationally recognized high school academic assessment in place of the statewide academic assessment; * Of how parents and, as appropriate, students may provide meaningful input regarding the district’s request (includes students in public charter schools who would be included in such assessments); and * Of any effect of such request on the instructional program in the district. | N/A | N/A |
| Section 7.2 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

## Element 7.3 –Comparability of the Locally Selected Nationally Recognized High School Academic Assessments with the State Assessments

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| The locally selected, nationally recognized high school academic assessment:   * Is equivalent to or more rigorous than the statewide assessment, with respect to— * The coverage of academic content; * The difficulty of the assessment; * The overall quality of the assessment; and * Any other aspects of the assessment that the State may establish in its technical criteria; * Produces valid and reliable data on student academic achievement with respect to all high school students and each subgroup of high school students in the district that— * Are comparable to student academic achievement data for all high school students and each subgroup of high school students produced by the statewide assessment at each academic achievement level; * Are expressed in terms consistent with the State’s academic achievement standards; and * Provide unbiased, rational, and consistent differentiation among schools within the State for the purpose of the State determined accountability system including calculating the Academic Achievement indicator and annually meaningfully differentiating between schools. | N/A | N/A |
| Section 7.3 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

U. S. Department of Education

**Peer Review of State Assessment Systems**

**August 2019 State 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 Academic Content Standards for All Students

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| **For academic content standards:**  The State formally adopted challenging academic content standards for all students in reading/language arts, mathematics and science and applies its academic content standards to all public schools and public school students in the State. |  | Not addressed in this submission |
| Section 1.1 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 1.2 – Challenging Academic Content Standards

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| **For academic content standards:**  The State’s challenging academic content standards in reading/language arts, mathematics, and science are aligned with entrance requirements for credit-bearing coursework in the system of public higher education in the State and relevant State career and technical education standards. |  | Not addressed in this submission |
| Section 1.2 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 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 annual general and alternate assessments aligned with **grade-level academic achievement standards** or alternate academic achievement standards in:   * Reading/language arts (R/LA) and mathematics in each of grades 3-8 and at least once in high school (grades 9-12); * Science at least once in each of three grade spans (3-5, 6-9 and 10-12).   AND  The State’s **academic content assessments** must be the same assessments administered to all students in the tested grades, with the following exceptions:   * Students with the most significant cognitive disabilities may take an alternate assessment aligned with alternate academic achievement standards. * A State may permit an LEA to administer a nationally recognized high school academic assessment in lieu of the State high school assessment if certain conditions are met. * A State that administers an end-of-course high school mathematics assessment may exempt an 8th grade student from the mathematics assessment typically administered in eighth grade and allow the student to take the State end-of-course mathematics test instead. * The Department may have approved the State, under the Innovative Assessment Demonstration Authority, to permit students in some LEAs to participate in a demonstration assessment system in lieu of participating in the State assessment. |  | Not addressed in this submission. |
| Section 1.3 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 1.4 – Policies for Including All Students in Assessments

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State requires the inclusion of all public elementary and secondary school students in its assessment system and clearly and consistently communicates this requirement to districts and schools.   * For students with disabilities, policies state that all students with disabilities in the State, including those children with disabilities publicly placed in private schools as a means of providing special education and related services, must be included in the assessment system; * For ELs: * Policies state that all ELs must be included in all aspects of the content assessment system, unless the State has chosen the statutory option for recently arrived ELs under which such ELs are exempt from one administration of its reading/ language arts assessment. * If a State has developed native language assessments for ELs in R/LA, ELs must be assessed in R/LA in English if they have been enrolled in U.S. schools for three or more consecutive years, except, if a district determines, on a case-by-case basis, that native language assessments would yield more accurate and reliable information, the district may assess a student with native language assessments for a period not to exceed two additional consecutive years. * If the State uses the flexibility for Native American language schools and programs: (1) the State provides the content assessment in the Native American language to all students in the school or program; (2) the State submits such content assessment for peer review as part of its State assessment system; and (3) the State continues to provide ELP assessments and services for ELs as required by law. The State must assess in English the students’ achievement in R/LA in high school. |  | Not addressed in this submission. |
| Section 1.4 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 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)).

|  |  |  |
| --- | --- | --- |
| **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 **academic** 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. |  | Not addressed in this submission. |
| Section 1.5 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

# SECTION 2: ASSESSMENT SYSTEM OPERATIONS

## Critical Element 2.1 – Test Design and Development

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| 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 academic content** **standards** for the grade that is being assessed 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 grade-level academic content standards** and support the intended interpretations and uses of the results. * Processes to ensure that each academic assessment is tailored to the knowledge and skills included in **the State’s academic content standards,** reflects appropriate inclusion of challenging content, and requires complex demonstrations or applications of knowledge and skills (i.e., higher-order thinking skills). * 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. | For SAT alignment;  The state in 3.1.5 mentions an alignment study but does not submit the study itself. | The request was for a timeline to address alignment issues between SAT and DE content standards, particularly in mathematics. DE does not plan to address those alignment issues by revising the SAT. The plan appears to be to encourage teachers to teach beyond the content of the test and to use additional assessments that would presumably cover the other content standards, although these additional assessments would not be part of large-scale reporting.  DDOE Response for SAT lack of alignment to the content standards: Document 3.1.5 describes the state’s position after reviewing the HUMRRO report of alignment between the SAT and the state standards. As noted in the SAT notes, there exists poor alignment particularly for geometry, statistics, and functions. Document 3.1.5 acknowledges the SAT does align well to algebra standards, which are known to align well with college readiness. This document continues to describe other tools teachers and students may use to address geometry and other standards not included in the SAT. Furthermore, the document states that the state has no intention of changing the content of the SAT. This leaves the state with no mechanism for monitoring student achievement of standards not assessed by the SAT. |
| Section 2.1 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * A plan and a timeline to address the alignment issues identified in the existing alignment studies. * See SAT peer review notes. | | |

## 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 achievement based on the **State’s academic content standards** in terms of content and cognitive process, including higher-order thinking skills. | Statement that the college board will provide the necessary evidence | State deferred to evidence provided by the College Board |
| Section 2.2 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * Evidence demonstrating that the State uses reasonable and technically sound procedures to develop and select items. * See SAT peer review notes. | | |

## Critical Element 2.3 – Test Administration

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| 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. | 5.1.2a page 23 details read aloud accommodations including that students must use the entire testing period and are not allowed to complete early.  Page 25 includes dictation to scribe description requiring students to spend the entire allotted time on the section before moving to the next section even if they complete the section early.  5.1.1 d-1 describes procedures for dictation to scribe  5.1.1 d-3 describes read aloud in English procedures. | Requiring a student to sit for the full allotted time when finished even when tested alone does not appear to be appropriate. The state is encouraged to review the decision to mandate students take the entire time allotted.  Procedures appear clear and appropriately detailed.  5.1.2a CB Accommodations Webinar 2018 DE 12-01-17 slides 23 & 25 address read aloud and scribe directions.  5.1.1 Accessibility Guidelines 2018-19, Appendix D (pp. 77-107) includes protocols for several accommodations and for reading various versions of the directions.  No documentation describes how the state monitors that test administrators complete the training modules provided by the SAT. (The SAT documentation also lacks such evidence.) |
| Section 2.3 Summary Statement | | |
| \_X\_\_ No additional evidence is required. | | |

## Critical Element 2.4 – Monitoring Test Administration

|  |  |  |
| --- | --- | --- |
| **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 academic assessments and the AA-AAAS. |  | Not addressed in this submission. |
| Section 2.4 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 2.5 – Test Security

|  |  |  |
| --- | --- | --- |
| **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 all assessments in the State system: the general academic assessments and the AA-AAAS. | 2.5.1a page 13  2.5.1.a  2.5.1.b  2.5.2.a  2.5.3 and a few others all document forms and training | The state appears to have reporting procedures for test irregularities and security breaches for assessments.  Detection of security breaches are covered in the evidence, however the remediation following a breach is not clear. The responses appear to assume local issues will not cause major security breaches.  Test Security Manual contains descriptions of processes for reporting and following up on incidents and irregularities.  No sign-in sheets nor other similar records of who took which training, and when, are provided in the evidence. |
| Section 2.5 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * Clear remediation procedures for when a security violation is identified and reported. * See SAT peer review notes | | |

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

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| 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. |  | Not addressed in this submission. |
| Section 2.6 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

# SECTION 3: TECHNICAL QUALITY – VALIDITY

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

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| 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 academic assessments** measure the knowledge and skills specified in the State’s academic content standards, including:   * Documentation of adequate alignment between the State’s assessments and the academic content standards the assessments are designed to measure in terms of content (i.e., knowledge and process), , balance of content, and cognitive complexity; * Documentation that the assessments address the depth and breadth of the content standards; * If the State has adopted alternate academic achievement standards and administers alternate assessments aligned with those standards, the assessments show adequate alignment to the State’s academic content standards for the grade in which the student is enrolled in terms of content match (i.e., no unrelated content) and the breadth of content and cognitive complexity determined in test design to be appropriate for students with the most significant cognitive disabilities. | **College Board will provide the information requested for the SAT request.** | The state deferred to the College Board for this evidence. The evidence requested could be satisfied if the evidence for CE 2.1 was acceptable. |
| Section 3.1 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * A plan and a timeline to address the alignment issues identified in the existing alignment studies. * See SAT peer review notes. | | |

## Critical Element 3.2 – Validity Based on Cognitive Processes

|  |  |  |
| --- | --- | --- |
| **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 cognitive processes** appropriate for each grade level as represented in the State’s academic content standards. | **College Board will provide the information requested for the SAT request.** | Deferred to College Board for this evidence |
| Section 3.2 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * See SAT peer review notes. | | |

## Critical Element 3.3 – Validity Based on Internal Structure

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| 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 **academic content standards**. |  | The state claims the college board will provide evidence for this critical evidence. |
| Section 3.3 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State’s academic content standards on which the intended interpretations and uses of results are based. * See SAT peer review notes. | | |

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

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State has documented adequate validityevidence that the State’s assessment scores are related as expected with other variables. |  | Not addressed in this submission. |
| Section 3.4 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale: | | |

# 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** |
| --- | --- | --- |
| 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; * 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 **a student’s academic achievement**. | 4.1.b  Critical Evidence 4.1.e Supplemental  SAT Score Reliability Estimates by Subgroup | The correlations between ERW to MSS ranged from 0.74 to 0.85 depending on the measures. The correlations between ERW and MSS are disconcerting since these domains should be separate and not necessarily highly correlated.  The provided evidence (4.1.b) does not answer the question of reliability for either SWD nor EL students. The evidence does not address the impact of accommodations.  In an additional document, the reliability estimates for SWD (math 0.75, ERW 0.85) and EL (math 0.75 and ERW 0.76) students were available. The estimates for both SWD and EL students are less than those of the general population and in three of the four analyses below the estimates usually deemed acceptable. This report does not compare reliabilities for these populations to the reliabilities for the general population. The peers note a noticeable difference in the estimates between the general population and the SWD and EL students. |
| Section 4.1 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * A plan to address the lower reliability estimates for SWD and EL students than the general population. * Reliability evidence for students who received accommodations. * See SAT peer review notes. | | |

## Critical Element 4.2 – Fairness and Accessibility

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| ***For all State academic assessments,*** assessments should be developed, to the extent practicable, using the principles of universal design for learning (UDL) (see definition[[4]](#footnote-4)).  **For academic content assessments**, the State has taken reasonable and appropriate steps to ensure that its assessments are accessible to all students and fair across student groups in their design, development and analysis. | 4.2.a  2.3.d  Defers to college board provided evidence. | Neither document addresses the gap in reliability directly. The College Board provided evidence of fairness in design and accommodations.  State deferred to SAT for this evidence. |
| Section 4.2 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * Evidence that the assessment is fair across student groups, including data related to students with disabilities and English learners. * See SAT peer review notes. | | |

## Critical Element 4.3 – Full Performance Continuum

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State has ensured that each assessment provides an adequately precise estimate of student performance across the full performance continuum for **academic assessments**, including performance for high- and low-achieving students. |  | Not addressed in this submission. |
| Section 4.3 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 4.4 – Scoring

|  |  |  |
| --- | --- | --- |
| **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 that are designed to produce reliable and meaningful results, facilitate valid score interpretations, and report assessment results in terms of the State’s **academic achievement standards**. |  | No evidence provided as part of this review |
| Section 4.4 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 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 **academic assessments** within a content area and grade level, within or across school years, the State ensures that all forms adequately represent the State’s **academic content standards** and yield consistent score interpretations such that the forms are comparable within and across school years. |  | No evidence provided as part of this review |
| Section 4.4 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 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; **or a native language version of the academic content assessment**), 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. |  | No evidence provided as part of this review |
| Section 4.6 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 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. |  | No evidence provided as part of this review |
| Section 4.7 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

# 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 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.  If a State adopts alternate academic achievement standards for students with the most significant cognitive disabilities and administers an alternate assessment aligned with those standards under ESEA section 1111(b)(1)(E) and (b)(2)(D), respectively, the State must:   * Establish guidelines for determining whether to assess a student with an AA-AAAS, including:   + A State definition of “students with the most significant cognitive disabilities” that addresses factors related to cognitive functioning and adaptive behavior; * Provide information for IEP Teams to inform decisions about student assessments that:   + Provides a clear explanation of the differences between assessments aligned with grade-level academic achievement standards and those aligned with alternate academic achievement standards, including any effects of State and local policies on a student's education resulting from taking an AA-AAAS, such as how participation in such assessments may delay or otherwise affect the student from completing the requirements for a regular high school diploma; * Ensure that parents of students assessed with an AA-AAAS are informed that their child’s achievement will be measured based on alternate academic achievement standards; * Not preclude a student with the most significant cognitive disabilities who takes an AA-AAAS from attempting to complete the requirements for a regular high school diploma; and * Promote, consistent with requirements under the IDEA, the involvement and progress of students with the most significant cognitive disabilities in the general education curriculum that is based on the State’s academic content standards for the grade in which the student is enrolled; and * Develop, disseminate information on, and promote the use of appropriate accommodations to ensure that a student with the most significant cognitive disabilities who does not take an AA-AAAS participates in academic instruction and assessments for the grade in which the student is enrolled. * The State has in place and monitors implementation of guidelines for IEP teams to apply in determining, on a case-by-case basis, which students with the most significant cognitive disabilities will be assessed based on alternate academic achievement standards, if applicable. Such guidelines must be developed in accordance with 34 CFR § 200.6(d).[[5]](#footnote-5) | **5.1.2a CB Accommodations Webinar 2018 DE 12-01-17** (slides 8-10).  Document 5.1.2b Participation in the Alternate Assessment Decision Making  Document 5.1.2c State Guidelines and Participation Criteria Overview-January 2019 (slides 17-23)  Document 5.1.3a Testing Accommodations Parents Session\_PIC of Del  Document 5.1.3b What Parents Need to Know PIC of Del | 5.1.2b is not a parent-friendly discussion; it is a helpful document for educators.  5.1.2b Participation in the Alternate Assessment Decision Making addresses the necessary evidence. This is a presentation given to educators, not to parents.  5.1.2c is not a parent friendly discussion.  5.1.2c State Guidelines and Participation Criteria Overview-January 2019also appears to be guidance for educators.  5.1.3a does not explain the differences in accommodations nor does it discuss the issue of SAT non-college/scholarship reportable scores.  5.1.3a Testing Accommodations Parents Session\_PIC of Del provides some policy information, examples of accommodations, and contact information.  5.1.3a only describes accommodations for the general assessments, not the assessments themselves.  5.1.3b is a document discussing Minnesota not DE  5.1.2a CB Accommodations Webinar 2018 DE 12-01-17 slide 9 refers to State Allowed Accommodations which are not college reportable. This policy may violate the equal protection clause by removing one of the benefits of participation in the assessment from some students.  According to 5.1.2.a, students receiving SAT-approved accommodations receive college-reportable scores. Students who receive state-approved accommodations that are not approved by SAT, receive non-college-reportable scores.  None of the cited evidence provides documentation for parents that describes different types of assessments, the standards they assess, or their benefits. The training documentation implies educators are trained and IEP teams are responsible to explain assessment matters to parents. |
| Section 5.1 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * Evidence of parent-friendly and accessible guidance that provides clear explanations of the differences between assessments based on grade-level academic achievement standards and assessments based on alternate academic achievement standards, as well as of the selection of appropriate accommodations for students with disabilities. * Evidence that children with disabilities are not denied the opportunity to participate in the assessment, nor are they denied any benefits from participation in the assessment. * See SAT peer review notes. | | |

## Critical Element 5.2 – Procedures for Including English Learners in Academic Content Assessments

| **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 ELs in public elementary and secondary schools in the State’s academic content assessments and clearly communicates this information to districts, schools, teachers, and parents, including, at a minimum:   * Procedures for determining whether an EL should be assessed with a linguistic accommodation(s); * Information on accessibility tools and features available to all students and assessment accommodations available for ELs;   + Assistance regarding selection of appropriate linguistic accommodations for ELs, including to the extent practicable, assessments in the language most likely to yield accurate and reliable information on what those students know and can do to determine the students’ mastery of skills in academic content areas until the students have achieved English language proficiency. | 5.1.1 figures 3 and 4, page 22 and Appendix G  Document **5.1.2a CB Accommodations Webinar 2018 DE 12-01-17** (slides 8-10). Slide 8 shows the types of accommodations and supports for the SAT.  Document **5.1.3a Testing Accommodations Parents Session\_PIC of Del**  Document **5.1.3b What Parents Need to Know\_PIC of Del** | For EL students, it appears in the state-provided evidence there is a possibility of a loop where decisions in 3 send the student to tree 4, but tree 4 sends the student back to tree 3. This loop could occur for an EL student with disabilities who is not in their first year in US schools. The language in the trees is not consistent across trees.  5.1.1 Accessibility Guidelines 2018-19 includes a decision tree for assessing ELs. Appendix G (p. 141) indicates some accommodations allowable for large scale assessment may result in non-college reportable scores. This policy may violate the equal protection clause by removing one of the benefits of participation in the assessment from some students.  5.1.2a CB Accommodations Webinar 2018 DE 12-01-17 slide 9 refers to State Allowed Accommodations which are not college reportable, potentially violating the equal protection clause. Slide 10 provides examples of supports for ELs.  According to 5.1.2.a, students receiving SAT-approved accommodations receives college-reportable scores. Students who receive state-approved accommodations that are not approved by SAT, receive non-college-reportable scores.  5.1.3b What Parents Need to Know\_PIC of Del provides additional information and is confusing because it refers to Minnesota rather the Delaware.  Guidance is not provided on which accommodations (e.g., translated directions, glossary, both, neither) are appropriate for which individuals.  According to 5.3.2, EL students may apply to use up to 150% time and receive college reportable scores.  The state documents appear to misalign with the SAT documentation provided to the department, particularly regarding approvable accommodations for EL students. |
| Section 5.2 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * Guidance regarding selection of appropriate accommodations for English learners. * Evidence that English learners are not denied the opportunity to participate in the assessment, nor are they denied any benefits from participation in the assessment. * See SAT peer review notes. | | |

## 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, such as, interoperability with, and ability to use, assistive technology, are available to measure the **academic achievement** of students with disabilities. * 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. | A variety of evidences were submitted.   Document **5.3.1 DDOE Website-SAT Accommodations**   Document **5.3.2 SAT Accommodations Updates\_2017**   Document **5.3.3 SSDC Implementation Handbook With SAAs**   Document **5.1.2a CB Accommodations Webinar 2018 DE 12-01-17** (slides 8-10). | None of the provided evidence takes the form of a study demonstrating the validity or reliability of scores for SWD or EL students. Furthermore, the documents continue to discuss non-reportable scores for students receiving accommodations. This leads the reviewer to believe that certain SWD or EL students will be denied some benefit of the assessment that students without disabilities receive, in the form of scores that make them eligible for scholarships or reporting to colleges for admission decisions.  The following documents describe policy and procedures around selecting accommodations:  5.3.1 DDOE Website-SAT Accommodations  5.3.2 SAT Accommodations Updates\_2017  5.3.3 SSDC Implementation Handbook With SAAs  5.1.2a CB Accommodations Webinar 2018 DE 12-01-17  The documents do not describe any data-based evidence (i.e., research or evaluation) of the effectiveness of accommodations once used. Such evidence is necessary to show accommodations have been appropriate, preserve the construct, and allow meaningful interpretations.  5.1.2a CB Accommodations Webinar 2018 DE 12-01-17 slide 9 refers to State Allowed Accommodations which are not college reportable. This policy may violate the equal protection clause by removing one of the benefits of participation in the assessment from some students.  Training documents provided for 5.1 with the materials cited here supply educators with information about how to assign accommodations for instruction and assessment. SAT has a substantial process for reviewing requests for accommodations, including construct-interference considerations and reviews by psychometricians to assure meaningful results when requested accommodations are used |
| Section 5.3 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence the accommodations the State 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; * As noted above in element 5.1, evidence that children with disabilities are not denied the opportunity to participate in the assessment and any benefits from participation in the assessment. * See SAT peer review notes. | | |

## 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 academic content assessments and AA-AAAS. |  | No evidence provided as part of this review |
| Section 5.4 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

# SECTION 6: ACADEMIC ACHIEVEMENT STANDARDS AND REPORTING

## Critical Element 6.1 – State Adoption of Academic 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 academic content standards:**  The State formally adopted **challenging academic achievement standards** in reading/language arts, mathematics, and science for all students, specifically:   * The State formally adopted academic achievement standards in the required tested grades and, at its option, alternate academic achievement standards for students with the most significant cognitive disabilities; * The State applies its academic achievement standards to all public elementary and secondary school students enrolled in the grade to which they apply, with the exception of students with the most significant cognitive disabilities to whom alternate academic achievement standards may apply;   The State’s academic achievement standards and, as applicable, alternate academic achievement standards, include: (1) at least three levels of achievement, with two for high achievement and a third for lower achievement; (2) descriptions of the competencies associated with each achievement level; and (3) achievement scores that differentiate among the achievement levels. |  | No evidence provided as part of this review |
| Section 6.1 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 6.2 – 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:   * **Academic achievement standards and, as applicable, alternate academic achievement standards**. |  | No evidence provided as part of this review |
| Section 6.2 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 6.3 – Challenging and Aligned Academic Achievement Standards

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| **For academic achievement standards:**  The State’s academic achievement standards are challenging and aligned with the State’s academic content standards and with entrance requirements for credit-bearing coursework in the system of public higher education in the State and relevant State career and technical education standards such that a student who scores at the proficient or above level has mastered what students are expected to know and be able to do by the time they graduate from high school in order to succeed in college and the workforce.  If the State has adopted alternate academic achievement standards for students with the most significant cognitive disabilities, the alternate academic achievement standards (1) are aligned with the State’s challenging academic content standards for the grade in which a student is enrolled; (2) promote access to the general curriculum consistent with the IDEA; (3) reflect professional judgment as to the highest possible standards achievable for such students; (4) are designated in the IEP for each student for whom alternate academic achievement standards apply; and (5) are aligned to ensure that a student who meets the alternate academic achievement standards is on track to pursue postsecondary education or competitive integrated employment. | 6.3a a national study that does not address DE specific standards.  College Board received data from Delaware to be included in this new Validity study **6.3.a National SAT validity study** (p. 20). Delaware data comes from Institution D  6.3.3 Predictive validity study of the SAT as a predictor of first year college GPA | DE does not provide a study demonstrating the SAT is aligned to the DE standards.  Based on previously submitted documentation, DE has adopted SAT cut scores of 480 for ELA and 530 for mathematics, corresponding to an SAT Total of 1,010. Based on Figure 4 (p. 16) of 6.3.a National SAT validity study, a student who attains this minimal score is within the band that has an 80% chance of being retained for a second year in college  Evidence supports that the SAT is a solid predictor of first year college performance. However, no evidence is provided to describe how scores and proficiency categories assigned for SAT performance describe to students and teachers how students are performing in terms of the state’s academic content standards.  No evidence is provided to gauge students’ career readiness, only college readiness |
| Section 6.3 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence of how the academic achievement standards are challenging and aligned with the State’s academic content standards such that a high school student who scores at the proficient or above level has mastered what students are expected to know and be able to do by the time they graduate from high school in order to succeed in college and the workforce. * See SAT peer review notes. | | |

## 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 **student academic achievement for all students and each student group at each achievement level[[6]](#footnote-6)**  For **academic content assessments**, the State reports assessment results, including itemized score analyses, to districts and schools so that parents, teachers, principals, and administrators can interpret the results and address the **specific academic needs of students**, and the State also provides interpretive guides to support appropriate uses of the assessment results.   * The State provides for the production and delivery of individual student interpretive, descriptive, and diagnostic reports after each administration of its academic content assessments that:   + Provide valid and reliable information regarding a **student’s academic achievement**;   + Report the **student’s academic achievement** in terms of the State’s grade-level academic achievement standards;   + Provide information to help parents, teachers, and principals interpret the test results and address the specific **academic needs of students**;   + 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. * The State follows a process and timeline for delivering individual student reports to parents, teachers, and principals as soon as practicable after each test administration. | 6.4.2  - Document **2.5.4 DTC Meeting 04-17-2019** (slide 25 *- Student and Educator Score releases***)**  - Document **6.4.1 DE-SAT Score Release Dates**  - Document **6.4.2 Delaware parent report**  - Document **5.1.2 Parent consent forms-Accommodations**  - Document **6.4.3 SAA Student score report-Accommodations.** | 6.4.2 does not provide goal nor objective level reporting for the state’s standards in ELA nor Math.  2.5.4 DTC Meeting 04-17-2019 and 6.4.1 DE-SAT Score Release Dates address the timeline for providing individualized scores.  6.4.2 Delaware parent report provides instructions for interpreting the assessment results.  6.4.3 SAA Student score report-Accommodations provides reports and interpretive information for students.  5.1.2 Parent consent forms-Accommodations may violate the equal protection clause by removing one of the benefits of participation in the assessment from some students.  Evidence of defensible interpretation of the subscale scores is not provided. On previous review, the point was made intercorrelations among subscale scores are too high, indicating they do not represent unique constructs.  Evidence provided indicates that the SAT supplies score information directly to student accounts within a few weeks of testing.  Delaware issues enhanced individual reports in July. These reports show how SAT scores map onto domain achievement levels.  SAT-supplied reports contain subscore information which provides parents or students with some information about strengths and weaknesses in terms of the SAT framework.  Reports do not contain information about student progress on the state content standards.  English, Spanish, and online reporting tools were described in the SAT evidence. Other formats may be requested, according to SAT evidence 6.4.a (SAT pdf “Understanding your Scores”).  The date/timeline for delivery of aggregate school/educator data is not clear to the peers.  The peers did not find a clear discussion of alternate forms of the individual student report.  The subscale scores provided on the report are not the content subscales based on the state content standards. |
| Section 6.4 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:  For the SAT:   * + - Evidence of reporting that facilitates timely, appropriate, credible, and defensible interpretations and uses of results for students tested by parents, educators, State officials, policymakers and other stakeholders, and the public, including:     - The production and delivery of individual student interpretive, descriptive, and diagnostic reports after each administration of its assessments that are available in alternate formats (e.g., Braille or large print) upon request and, to the extent practicable, in a native language that parents can understand.     - A process and timeline for delivering reports to teachers and principals as soon as practicable after each test administration.     - See SAT peer review notes. | | |

# SECTION 7: LOCALLY SELECTED NATIONALLY RECOGNIZED HIGH SCHOOL ACADEMIC ASSESSMENTS

(if applicable; evidence for this section would be submitted in ADDITION to evidence for sections 1 through 6)

## Critical Element 7.1 – State Procedures for the Use of Locally Selected, Nationally Recognized High School Academic Assessments

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| The State has established technical criteria to use in its review of any submission of a locally selected, nationally recognized high school academic assessment. The State has completed this review using its established technical criteria and has found the assessment meets its criteria **prior to** submitting for the Department’s assessment peer review.  The State’s technical criteria include a determination that the assessment:   * Is aligned with the challenging State academic standards; and * Addresses the depth and breadth of those standards.   AND | N/A | N/A |
| The State has procedures in place to ensure that a district that chooses to use a nationally recognized high school academic assessment administers the same assessment to all high school students in the district except for students with the most significant cognitive disabilities who may be assessed with an AA-AAAS. |  |  |
| AND  The technical criteria established by the State in reviewing a locally selected, nationally recognized high school academic assessment must ensure that the use of appropriate accommodations does not deny a student with a disability or an EL—   * The opportunity to participate in the assessment; and * Any of the benefits from participation in the assessment that are afforded to students without disabilities or students who are not ELs. |  |  |
| Section 7.1 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

## Element 7.2 –State Monitoring of Districts Regarding the Use of Locally Selected, Nationally Recognized High School Academic Assessments

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| The State must have procedures in place to ensure that:  **Before** a district requests approval from the State to use a nationally recognized high school academic assessment, the district notifies all parents of high school students it serves—   * That the district intends to request approval from the State to use a nationally recognized high school academic assessment in place of the statewide academic assessment; * Of how parents and, as appropriate, students may provide meaningful input regarding the district’s request (includes students in public charter schools who would be included in such assessments); and * Of any effect of such request on the instructional program in the district. | N/A | N/A |
| Section 7.2 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

## Element 7.3 –Comparability of the Locally Selected Nationally Recognized High School Academic Assessments with the State Assessments

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| The locally selected, nationally recognized high school academic assessment:   * Is equivalent to or more rigorous than the statewide assessment, with respect to— * The coverage of academic content; * The difficulty of the assessment; * The overall quality of the assessment; and * Any other aspects of the assessment that the State may establish in its technical criteria; * Produces valid and reliable data on student academic achievement with respect to all high school students and each subgroup of high school students in the district that— * Are comparable to student academic achievement data for all high school students and each subgroup of high school students produced by the statewide assessment at each academic achievement level; * Are expressed in terms consistent with the State’s academic achievement standards; and * Provide unbiased, rational, and consistent differentiation among schools within the State for the purpose of the State determined accountability system including calculating the Academic Achievement indicator and annually meaningfully differentiating between schools. | N/A | N/A |
| Section 7.3 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

U. S. Department of Education

**Peer Review of State Assessment Systems**

**August 2019 State 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 Academic Content Standards for All Students

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| **For academic content standards:**  The State formally adopted challenging academic content standards for all students in reading/language arts, mathematics and science and applies its academic content standards to all public schools and public school students in the State. | 1.1.1b  1.1.3a | 1.1.3a - Several areas show what appears to be poor alignment. |
| Section 1.1 Summary Statement | | |
| \_X\_\_ No additional evidence is required. | | |

## Critical Element 1.2 – Challenging Academic Content Standards

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| **For academic content standards:**  The State’s challenging academic content standards in reading/language arts, mathematics, and science are aligned with entrance requirements for credit-bearing coursework in the system of public higher education in the State and relevant State career and technical education standards. |  | Content standards were reviewed as part of the general assessment review. |
| Section 1.2 Summary Statement | | |
| \_X\_\_ No additional evidence is required | | |

## 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 annual general and alternate assessments aligned with **grade-level academic achievement standards** or alternate academic achievement standards in:   * Reading/language arts (R/LA) and mathematics in each of grades 3-8 and at least once in high school (grades 9-12); * Science at least once in each of three grade spans (3-5, 6-9 and 10-12).   AND  The State’s **academic content assessments** must be the same assessments administered to all students in the tested grades, with the following exceptions:   * Students with the most significant cognitive disabilities may take an alternate assessment aligned with alternate academic achievement standards. * A State may permit an LEA to administer a nationally recognized high school academic assessment in lieu of the State high school assessment if certain conditions are met. * A State that administers an end-of-course high school mathematics assessment may exempt an 8th grade student from the mathematics assessment typically administered in eighth grade and allow the student to take the State end-of-course mathematics test instead. * The Department may have approved the State, under the Innovative Assessment Demonstration Authority, to permit students in some LEAs to participate in a demonstration assessment system in lieu of participating in the State assessment. |  | Reviewed as part of the general assessment review. |
| Section 1.3 Summary Statement | | |
| \_\_x\_ No additional evidence is required x | | |

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

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State requires the inclusion of all public elementary and secondary school students in its assessment system and clearly and consistently communicates this requirement to districts and schools.   * For students with disabilities, policies state that all students with disabilities in the State, including those children with disabilities publicly placed in private schools as a means of providing special education and related services, must be included in the assessment system; * For ELs: * Policies state that all ELs must be included in all aspects of the content assessment system, unless the State has chosen the statutory option for recently arrived ELs under which such ELs are exempt from one administration of its reading/ language arts assessment. * If a State has developed native language assessments for ELs in R/LA, ELs must be assessed in R/LA in English if they have been enrolled in U.S. schools for three or more consecutive years, except, if a district determines, on a case-by-case basis, that native language assessments would yield more accurate and reliable information, the district may assess a student with native language assessments for a period not to exceed two additional consecutive years. * If the State uses the flexibility for Native American language schools and programs: (1) the State provides the content assessment in the Native American language to all students in the school or program; (2) the State submits such content assessment for peer review as part of its State assessment system; and (3) the State continues to provide ELP assessments and services for ELs as required by law. The State must assess in English the students’ achievement in R/LA in high school. |  | Reviewed as part of the general assessment review. |
| Section 1.4 Summary Statement | | |
| \_\_x\_ No additional evidence is required | | |

## 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)).

|  |  |  |
| --- | --- | --- |
| **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 **academic** 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. |  | Delaware adopted the Common State Standards for all students in August 2010 and the Next Generation Science Standards in 2013, so this requirement does not apply. |
| Section 1.5 Summary Statement | | |
| \_\_x\_ No additional evidence is required | | |

# SECTION 2: ASSESSMENT SYSTEM OPERATIONS

## Critical Element 2.1 – Test Design and Development

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| 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 academic content** **standards** for the grade that is being assessed 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 grade-level academic content standards** and support the intended interpretations and uses of the results. * Processes to ensure that each academic assessment is tailored to the knowledge and skills included in **the State’s academic content standards,** reflects appropriate inclusion of challenging content, and requires complex demonstrations or applications of knowledge and skills (i.e., higher-order thinking skills). * 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. | DLM provided and resent via DE  DLM submitted information on behalf of several states, not including DE  - Document 2.1.1a **DLM Peer\_Review\_2014-15\_YE\_Model\_Submission 2016**  - Document 2.1.1b **DLM\_YE\_Assessment\_Peer\_Review\_Notes\_Feb\_2018** | If the DLM evidence was appropriate based on DLM peer review this is fine, otherwise the state needs to provide evidence for this critical element.  1.1.3a demonstrates an alignment study between DLM and Delaware’s Grade Band Extensions in ELA and Math. Some weaknesses appear to have been identified. This document also refers to a positive alignment study result between common core standards and DE GBEs in 2013.  DLM\_YE\_Assessment\_Peer\_Review\_Notes\_Feb\_2018 indicates February 2018 ELA and Math YE model review panel accepted evidence for CE 2.1 without request for additional information. This evidence is acceptable to the degree Delaware’s state content standards are aligned with those of the reviewed states, presumably all using Common Core State Standards  According to the State index for CE 1.2, the state adopted the DLM Essential Elements and associated assessments for students with significant cognitive disabilities. DLM ELA and Math YE model peer review 2018 did not request more evidence for 2.1.  See DLM science assessment peer review notes. |
| Section 2.1 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * See DLM science peer review. * Evidence of alignment between DE science content standards and the DLM science assessment. | | |

## 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 achievement based on the **State’s academic content standards** in terms of content and cognitive process, including higher-order thinking skills. | DLM has provided the information relevant to this section.  DE referred to DLM for this evidence | Relies on DLM meeting this critical element  Deferred to DLM  DLM ELA and Math YE peer review 2018 did not request more evidence for 2.2. |
| Section 2.2 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * See DLM science peer review notes. | | |

## Critical Element 2.3 – Test Administration

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| 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. | Some documents were only available on the DLM website.  DE implements DLM trainings. Refer to DLM documentation for information about the quality of the training materials. | Training information deferred to DLM.  Documents (2.31a, , 2.3.2a-d, 2.3.3a-h, 2.3.4, 5.1.2) collectively establish clear and thorough administration procedures, as well as trainings to ensure educators know how to administer the assessments including assessments to special groups.  Technology requirements and contingency plans were not clearly included in the submission. This information is among the DLM materials.  DLM documentation of available and required training is available at the DLM/Delaware website.  Documents for 2.3 describe several levels of informational meetings and training events, including samples of sign-in sheets that provide documentation of individuals who have been trained.  DLM publishes a Technology Manual describing requirements for testing. |
| Section 2.3 Summary Statement | | |
| \_\_X\_ No additional evidence is required | | |

## Critical Element 2.4 – Monitoring Test Administration

|  |  |  |
| --- | --- | --- |
| **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 academic assessments and the AA-AAAS. |  | DDOE provided evidence of monitor training, a protocol, and completed reports to schools. This is sufficient to meet the requirements of this critical element. However, Department staff note that there was no information in the protocol or the training on how to review the use of accommodations, even though this is included in the final report. This concern is noted in critical element 5.4. |
| Section 2.4 Summary Statement | | |
| \_\_x\_ No additional evidence is required | | |

## Critical Element 2.5 – Test Security

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| 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 all assessments in the State system: the general academic assessments and the AA-AAAS. | 2.5.1a-c | The provided documentation evidences reporting systems for irregularities but does not describe the procedures taken when security violations occur. Specifically, what is done to mitigate the impact of an item release etc.?  Documents collectively indicate an appropriate set of policies and procedures to ensure integrity. Test security manuals and training (2.5.1a-c) address prevention, detection, and investigation of irregularities.  Several documents and manuals describe appropriate test security safeguards. The forms for monitoring and reporting irregularities did not appear to be specialized for the alternate assessments.  After looking at the TA Guide for DLM, there appears to be training on security within the Moodle training modules. |
| Section 2.5 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * Clear remediation procedures when a security violation is identified and reported | | |

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

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| 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. | 2.6.8 | Minimum N is 15 but also cell values of less than 5 or within 5 of the population are repressed.  The state’s method appears to be a valid way to decrease the risk of releasing personally identifiable information if the converse is also applied….if the cell value encompasses 95% or more of the population. i.e., 94% of the grade passed and that is of 16 students revealing that one student failed.  State provided sufficient evidence of protection of the integrity and confidentiality of test-related data (documents 1.3.1, 2.6.1, 2.6.2a-d, 2.6.3) and student assessment data (documents 2.6.4 – 2.6.7), including cell size rules addressing suppression (2.6.8; the population for the cell must be 15 or more and there cannot be a cell value less than 5, nor within 5 of the population value).  The state provided documentation of policies and technology permissions that illustrate mechanisms for protecting personal and assessment data. |
| Section 2.6 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * Evidence the state masks cells that reveal less than 5 students by exclusion (i.e., where the percent passing reveals a single student failing). | | |

# SECTION 3: TECHNICAL QUALITY – VALIDITY

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

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| 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 academic assessments** measure the knowledge and skills specified in the State’s academic content standards, including:   * Documentation of adequate alignment between the State’s assessments and the academic content standards the assessments are designed to measure in terms of content (i.e., knowledge and process), , balance of content, and cognitive complexity; * Documentation that the assessments address the depth and breadth of the content standards; * If the State has adopted alternate academic achievement standards and administers alternate assessments aligned with those standards, the assessments show adequate alignment to the State’s academic content standards for the grade in which the student is enrolled in terms of content match (i.e., no unrelated content) and the breadth of content and cognitive complexity determined in test design to be appropriate for students with the most significant cognitive disabilities. |  | No evidence provided by the state for this critical element  State deferred to DLM for this CE. |
| Section 3.1 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * See DLM science peer review notes. | | |

## Critical Element 3.2 – Validity Based on Cognitive Processes

|  |  |  |
| --- | --- | --- |
| **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 cognitive processes** appropriate for each grade level as represented in the State’s academic content standards. |  | No evidence provided by the state for this critical element  State deferred to DLM for this CE. |
| Section 3.2 Summary Statement | | |
| \_X\_\_ No additional evidence is required | | |

## Critical Element 3.3 – Validity Based on Internal Structure

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| 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 **academic content standards**. |  | No evidence provided by the state for this critical element  State deferred to DLM for this CE. |
| Section 3.3 Summary Statement | | |
| \_X\_\_ No additional evidence is required | | |

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

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State has documented adequate validityevidence that the State’s assessment scores are related as expected with other variables. |  | No evidence provided by the state for this critical element  State deferred to DLM for this CE. |
| Section 3.4 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * See DLM science peer review notes. | | |

# 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** |
| --- | --- | --- |
| 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; * 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 **a student’s academic achievement**. |  | No evidence provided by the state for this critical element  State deferred to DLM for this CE. |
| Section 4.1 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * See DLM Science peer review notes. | | |

## Critical Element 4.2 – Fairness and Accessibility

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| ***For all State academic assessments,*** assessments should be developed, to the extent practicable, using the principles of universal design for learning (UDL) (see definition[[7]](#footnote-7)).  **For academic content assessments**, the State has taken reasonable and appropriate steps to ensure that its assessments are accessible to all students and fair across student groups in their design, development and analysis. |  | No evidence provided by the state for this critical element  State deferred to DLM for this CE. |
| Section 4.2 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * See science DLM peer review notes. | | |

## Critical Element 4.3 – Full Performance Continuum

|  |  |  |
| --- | --- | --- |
| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| The State has ensured that each assessment provides an adequately precise estimate of student performance across the full performance continuum for **academic assessments**, including performance for high- and low-achieving students. |  | No evidence provided by the state for this critical element  State deferred to DLM for this CE. |
| Section 4.3 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * See DLM science peer review notes. | | |

## Critical Element 4.4 – Scoring

|  |  |  |
| --- | --- | --- |
| **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 that are designed to produce reliable and meaningful results, facilitate valid score interpretations, and report assessment results in terms of the State’s **academic achievement standards**. |  | No evidence provided by the state for this critical element  State deferred to DLM for this CE. |
| Section 4.4 Summary Statement | | |
| \_X\_\_ No additional evidence is required | | |

## 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 **academic assessments** within a content area and grade level, within or across school years, the State ensures that all forms adequately represent the State’s **academic content standards** and yield consistent score interpretations such that the forms are comparable within and across school years. | No evidence provided by the state for this critical element | State deferred to DLM for this CE. |
| Section 4.5 Summary Statement | | |
| \_X\_\_ No additional evidence is required | | |

## 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; **or a native language version of the academic content assessment**), 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. | No evidence provided by the state for this critical element | State deferred to DLM for this CE. |
| Section 4.6 Summary Statement | | |
| \_X\_\_ No additional evidence is required | | |

## 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. | No evidence provided by the state for this critical element | State deferred to DLM for this CE. |
| Section 4.7 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * See DLM science peer review notes. | | |

# 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 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.  If a State adopts alternate academic achievement standards for students with the most significant cognitive disabilities and administers an alternate assessment aligned with those standards under ESEA section 1111(b)(1)(E) and (b)(2)(D), respectively, the State must:   * Establish guidelines for determining whether to assess a student with an AA-AAAS, including:   + A State definition of “students with the most significant cognitive disabilities” that addresses factors related to cognitive functioning and adaptive behavior; * Provide information for IEP Teams to inform decisions about student assessments that:   + Provides a clear explanation of the differences between assessments aligned with grade-level academic achievement standards and those aligned with alternate academic achievement standards, including any effects of State and local policies on a student's education resulting from taking an AA-AAAS, such as how participation in such assessments may delay or otherwise affect the student from completing the requirements for a regular high school diploma; * Ensure that parents of students assessed with an AA-AAAS are informed that their child’s achievement will be measured based on alternate academic achievement standards; * Not preclude a student with the most significant cognitive disabilities who takes an AA-AAAS from attempting to complete the requirements for a regular high school diploma; and * Promote, consistent with requirements under the IDEA, the involvement and progress of students with the most significant cognitive disabilities in the general education curriculum that is based on the State’s academic content standards for the grade in which the student is enrolled; and * Develop, disseminate information on, and promote the use of appropriate accommodations to ensure that a student with the most significant cognitive disabilities who does not take an AA-AAAS participates in academic instruction and assessments for the grade in which the student is enrolled. * The State has in place and monitors implementation of guidelines for IEP teams to apply in determining, on a case-by-case basis, which students with the most significant cognitive disabilities will be assessed based on alternate academic achievement standards, if applicable. Such guidelines must be developed in accordance with 34 CFR § 200.6(d).[[8]](#footnote-8) | 5.1.3b  A variety of other documents  - Document 1.3.1 **DE Administrative Code\_Title 14\_ Education**, Section 151 Paragraph f (p.18); and Paragraph j (p.19) Subchapter III (pp.18-19) Section 151 Paragraphs a through f.  - Document 5.1.1a **About the DeSSA-Alt for Parents**  - Document 5.1.1b **DeSSA-Alt Website**  - Document 2.3.2d **DeSSA-Alt Revised Participation Guidelines Form** (p.126) Appendix F-1 includes statement for parents to understand the repercussions of participating in the Alternate assessment)  - Document 2.3.2c **DOE-Approved Process Accessibility Guidelines and Appendix Training 2018.** Coordinators how to request special accommodations for our students on the general assessment.  - Document 5.1.2b **Participation in the Alternate Assessment Decision Making** (Training for IEP team leaders and teachers)  - Document 5.1.2c **State Guidelines & Participation Criteria Overview-January 2019** (all slides)  - Document 2.3.1b **Presentation to Governor’s Advisor Council for Exceptional Citizens (GACEC) Oct 13, 2018**  - Document 5.1.3a **Testing Accommodations Parent Session\_PIC of Del** (p.3)  - Document 5.1.3b **What Parents Need to Know\_PIC of Del**  - Document 5.1.2 **Accessibility Guidelines 2018-19 FINAL**   (Section II. for SWDs outlines the decision making-process for SWDs participation in regular or alternate State assessments.   Figure 2. p.17 includes the decision tree for assessing SWDs)   (Section III, p.18, for ELLs, Figure 3. p.22 includes the decision tree for assessing ELLs).   (Section IV, p.23, for students that are both SWD and ELL) | 5.1.3b is a Minnesota document; it does not mention DE.  There is no provided evidence that the state monitors, reviews, or otherwise has systemic methods to ensure students using the alternate assessment have the assessment as part of their IEP, LEP or 504 plan; nor that the accommodations used are the same as used during instruction.  There does not appear to be a single document that explains the differences of the assessments and the resulting outcomes for parents.  The documents mix DE GBEs and DLM essential elements and appear to contradict each other. The peers suggest updating the complete set of documents to reflect the current practice or writing a single all-encompassing current document.  From the provided documentation, it is unclear to the peers that the state has one set of academic content standards for all students, and it appears that the assessment is based on an alternate achievement standard.  These documents also are unclear as to what standards are being used, common core or Delaware specific standards. This leads to misunderstandings about what is actually being assessed.  There appears to be mixed messaging about content vs. achievement standards and if discussing achievement standards, which ones are being discussed (general or extended?  There appears to be a waiver parents are asked to sign stating that students who continue to use the DLM assessment will not earn a regular diploma.  The provided evidence does not explicitly lead the peers to understand that students who use the DLM assessment may have the opportunity to earn a regular diploma in some manner.  It is unclear whether or how the state promotes the involvement of students with the most significant cognitive disabilities in the general education curriculum. This information may be relevant to CE 3.1, because evidence indicating alignment between the DeSSA-Alt and the Common Core State Standards would imply involvement in the grade level general education curriculum.  5.1.2 The flow chart on p. 17 clarifies a student with a significant cognitive disability may take a general assessment with accommodations if the IEP team feels doing so is appropriate. Much of this information is repeated in 2.3.1b. These documents are not parent-friendly. It is unclear how widely disseminated the possibility of a student with a significant cognitive disability taking the general assessment with accommodations is.  Descriptions of the importance of communicating the distinctions between different assessments to parents is presented 5.1.2.b and 5.1.2.c.  5.1.2.c contains a definition of students who qualify as students with significant cognitive disabilities.  5.1.2 page 15 contains language that discusses the rules for students that switch between Alt and GenEd assessments.  Ample evidence is included in the State and DLM documentation about implementing accessibility features as well as available and needed supports/accommodations. |
| Section 5.1 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * Evidence of a systemic method for monitoring that the student’s assessment is aligned to the individual student’s educational plan which is aligned to the student’s classroom instruction. * Documentation that is accessible for parents that describes the nature of the assessment options and the consequences of the assessment choice. * Documentation that uses clear language that makes it obvious that the state has one set of content standards, as well as one set of general achievement standards and one set of alternate achievement standards. * Documentation of policy and procedures that allow a student to move from an alternate assessment to the general assessment and the process by which a student who has used an alternate assessment may still earn a regular diploma. | | |

## Critical Element 5.2 – Procedures for Including English Learners in Academic Content Assessments

| **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 ELs in public elementary and secondary schools in the State’s academic content assessments and clearly communicates this information to districts, schools, teachers, and parents, including, at a minimum:   * Procedures for determining whether an EL should be assessed with a linguistic accommodation(s); * Information on accessibility tools and features available to all students and assessment accommodations available for ELs;   + Assistance regarding selection of appropriate linguistic accommodations for ELs, including to the extent practicable, assessments in the language most likely to yield accurate and reliable information on what those students know and can do to determine the students’ mastery of skills in academic content areas until the students have achieved English language proficiency. | 5.1.2  - Document 1.3.1 **DE Administrative Code\_Title 14\_Education;** Subchapter III (pp.18-19) Section 151 Paragraphs a through f.  - Document 1.3.2a **DE\_Requirement to Test Students.**  - Document 1.3.2b **DE\_Requirement to Test Students.Spanish**  - Document 5.2.1 **Assessment Updates for EL Coordinator Meeting 4-12-2018** (Sections III and IV of Accessibility Guidelines for specific information)  - Document 5.1.2 **Accessibility Guidelines 2018-19 FINAL** provided information on Accessibility Guidelines to EL workgroup for inclusion in state’s assessment system. These are for regular students with needed accommodations but it is always good practice to remind educators of what is allowed on Alternate assessment (no restrictions) and other assessments where students need accommodations.   Section III - English Learners (pg. 18).   Section III, Fig. 3 (p.22) – Decision tree for accessing ELLs   Section III, Justifiable Rationale for Selection and Deletion of EL Accommodations   Section IV - Students that are both SWD and ELL) (p.23)  Appendix D-5 - Read Aloud Protocol for Spanish accommodations, (p.95), Covers the qualifications for test readers, the preparation, general guidelines and post-administration requirements.   Appendix D-6, (p.102), for suggested Spanish test Reader Script   Appendix F – Alternate Assessment Forms  Appendix F-2 is the ACCESS-Alt Participation Guidelines (p.127)  Appendix F-3 is the ACCESS-Alt Participation Criteria Decision Tree (p.128) | The system for inclusion of EL students is not clear and figures 3 and 4 point the student from one to the other without answering the question of eligibility.  1.3.1, 1.3.2a-b, and 5.2.1 indicate the requirement for including all students in the statewide assessment system.  5.1.2 Accessibility Guidelines 2018-19 includes a decision tree for assessing ELs, as well as information on available universal tools, designated supports, and accommodations. Appendix G (p. 141) indicates some accommodations allowable for large scale assessment may result in non-college reportable scores. This policy may violate the equal protection clause by removing one of the benefits of participation in the assessment from some students.  Guidance is not provided on which accommodations (e.g., translated directions, glossary, both, neither) are appropriate for which individuals.  5.1.2 contains sections pertaining to assigning ELs to appropriate assessments as well as information about particular accommodations that are available for different assessments. |
| Section 5.2 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * Clear documentation providing guidance to educators on selection of appropriate linguistic accommodations for Els to use on the assessment. | | |

## 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, such as, interoperability with, and ability to use, assistive technology, are available to measure the **academic achievement** of students with disabilities. * 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.’ | - Document 5.1.1b **DeSSA-Alt Website**  - Document 5.1.2b **Participation in the Alternate Assessment Decision Making** | 5.1.2 ensures appropriate accommodations are available to measure academic achievement of students with disabilities, and are available to ELs. Unique accommodations request forms are included (pp. 121-122).  The documents do not describe any data-based evidence (i.e., research or evaluation) of the effectiveness of accommodations once used. Such evidence is necessary to show accommodations have been appropriate, preserve the construct, and allow meaningful interpretations. However, the DLM peer review found the assessment to meet this critical element. As data becomes available, studies measuring the effectiveness of accommodations in improving the reliability of scores, the validity of inferences, and the fairness of outcomes between students with and without disabilities should be undertaken and published.  2.6.2.a discusses DE expectations to comply with interoperability standards for data access and transmission. |
| Section 5.3 Summary Statement | | |
| \_X\_\_ No additional evidence is required | | |

## 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 academic content assessments and AA-AAAS. | - Document 2.4.1a **2018 School Visits Training**  - Document 2.4.1b **DeSSA ALT Site Visit Observation Form 2018**  - Document 2.4.1c **Brennen School DeSSA-ALT Site Visit Report-2018**  - Document 2.4.1d **Charlton School DeSSA-ALT Site Visit Report-2018**  - Document 2.4.2 **DTC\_Meeting\_6-19-18** (slides 7-12)  - Document 5.4.1 **DDOE-Approved Tests Accommodations Summary 2017-18** | The state has not demonstrated that a systemic process is in place to ensure the student’s educational plan accommodations are aligned to classroom instructional accommodations and assessment accommodations.  Data does not address whether accommodations for individual students are consistent with instruction, nor whether they are consistent with those selected by the team.  The state documentation, primarily items numbers 2.4.x with 5.4.1, provides evidence that there are established procedures and forms to document observations of test administrations to ensure the integrity of the assessment system.  Because DLM assessments are assigned at the student level, local monitors are unable to check whether students have received the “right” testlet with the correct accessibility features made available during testing. Is there a report of actual test administrations and accommodations and whether they matched the PNP settings and student profiles? |
| Section 5.4 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * Evidence of a systemic method for monitoring that the student’s assessment is aligned to the individual student’s educational plan which is aligned to the student’s classroom instruction. | | |

# SECTION 6: ACADEMIC ACHIEVEMENT STANDARDS AND REPORTING

## Critical Element 6.1 – State Adoption of Academic 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 academic content standards:**  The State formally adopted **challenging academic achievement standards** in reading/language arts, mathematics, and science for all students, specifically:   * The State formally adopted academic achievement standards in the required tested grades and, at its option, alternate academic achievement standards for students with the most significant cognitive disabilities; * The State applies its academic achievement standards to all public elementary and secondary school students enrolled in the grade to which they apply, with the exception of students with the most significant cognitive disabilities to whom alternate academic achievement standards may apply;   The State’s academic achievement standards and, as applicable, alternate academic achievement standards, include: (1) at least three levels of achievement, with two for high achievement and a third for lower achievement; (2) descriptions of the competencies associated with each achievement level; and (3) achievement scores that differentiate among the achievement levels. | 6.1.1  - Document 5.1.1b **DeSSA\_Alt Website**.  - Document 6.1.1a **SBE Standard Setting Presentation** (slides 2,6-7, 12-17)  - Document 6.1.1b **DeSSA-Alt Performance Levels 2018**  - Document 6.1.1c **ELA-YE-PLDs-2017-FINAL**  - Document 6.1.1d **Math-YE-PLDs-2017-FINAL**  - Document 6.1.1e **Science-PLDs-2017-FINAL**  - Document 6.1.2a **SBE Dec2018 Agenda**  - Document 6.1.2b **SBE DeSSA-Alt Cut Scores and PLDs Presentation-Dec 2018**  - Document 6.1.2c **SBE Alternate Cut Scores Approval-Draft** | DLM was adopted and previously approved through peer review. The scores differentiating among achievement levels were established by DLM.  Documents (6.1.1a-d, 6.1.2a-c) collectively indicate the state formally adopted alternate academic achievement standards. These standards include four levels of achievement, descriptions associated with each achievement level, and scores that differentiate among achievement levels.  State deferred to DLM for this CE.  The PLDs consist of 4 levels, with detailed descriptions and numerical cut scores established by DLM for the consortium of states using the DLM alternate assessments. |
| Section 6.1 Summary Statement | | |
| \_\_X\_ No additional evidence is required | | |

## Critical Element 6.2 – 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:   * **Academic achievement standards and, as applicable, alternate academic achievement standards**. | - Document 6.1.1a **SBE Standard Setting Presentation** (slides 2,6-7, 12-17)  - Document 6.1.1b **DeSSA-Alt Performance Levels 2018** | The standard setting appears to follow standard protocols except that the standard setting appears to have occurred before DE had adopted the DLM essential elements for the content being measured.  Partially deferred to DLM.  6.1.1a indicated the Condensed Mastery Profile method of standard setting was used.  State deferred to DLM for this CE. The state also provided evidence of having communicated the alternate academic achievement standards. |
| Section 6.2 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * See DLM science peer review notes. | | |

## Critical Element 6.3 – Challenging and Aligned Academic Achievement Standards

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| **For academic achievement standards:**  The State’s academic achievement standards are challenging and aligned with the State’s academic content standards and with entrance requirements for credit-bearing coursework in the system of public higher education in the State and relevant State career and technical education standards such that a student who scores at the proficient or above level has mastered what students are expected to know and be able to do by the time they graduate from high school in order to succeed in college and the workforce.  If the State has adopted alternate academic achievement standards for students with the most significant cognitive disabilities, the alternate academic achievement standards (1) are aligned with the State’s challenging academic content standards for the grade in which a student is enrolled; (2) promote access to the general curriculum consistent with the IDEA; (3) reflect professional judgment as to the highest possible standards achievable for such students; (4) are designated in the IEP for each student for whom alternate academic achievement standards apply; and (5) are aligned to ensure that a student who meets the alternate academic achievement standards is on track to pursue postsecondary education or competitive integrated employment. | The state defers to DLM  See Critical Elements 1.1, 1.2, and 6.1 | 2.3.2d is used to document the alternate academic achievement standards are designated in the IEP.  State deferred to DLM for this CE. |
| Section 6.3 Summary Statement | | |
| \_\_X\_ The following additional evidence is needed/provide brief rationale:   * Please provide evidence that your alternate achievement standards ensure that students are on track to pursue college and career. | | |

## 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 **student academic achievement for all students and each student group at each achievement level[[9]](#footnote-9)**  For **academic content assessments**, the State reports assessment results, including itemized score analyses, to districts and schools so that parents, teachers, principals, and administrators can interpret the results and address the **specific academic needs of students**, and the State also provides interpretive guides to support appropriate uses of the assessment results.   * The State provides for the production and delivery of individual student interpretive, descriptive, and diagnostic reports after each administration of its academic content assessments that:   + Provide valid and reliable information regarding a **student’s academic achievement**;   + Report the **student’s academic achievement** in terms of the State’s grade-level academic achievement standards;   + Provide information to help parents, teachers, and principals interpret the test results and address the specific **academic needs of students**;   + 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. * The State follows a process and timeline for delivering individual student reports to parents, teachers, and principals as soon as practicable after each test administration. | - Document 1.3.1 **DE Administrative Code\_Title 14\_Education,** Section 155 (p.22)  - Document 6.4.1 **DeSSA Executive State Summary 2018** (pp.50-61)  - Document 6.4.2 **Assessment Reporting. DLM ALT**  - Document 6.4.3 **DSARA Users guide v2.0** (DDOE and District Data Access overview)  - Document 6.4.4 **DeSSA-Alt Participation Data\_Spring 2018** shows all students  disaggregated by group and state assessment types.  - Document 6.4.5a **DeSSA-Alt Sample Parent report**  - Document 6.4.5b **Parent Interpretive Guide-2017-18**  - Document 6.4.5c **Parent Interpretive Guide -2017-18\_Spanish**  - Document 6.4.5d **Talking to Parents about Score Reports\_DLM**  - Document 1.3.4 **DE Parent Brochure. final (2017-18)** | Partially deferred to DLM.  6.4.1 reports participation rates and the percentages of students at various proficiency levels across grades and content areas. This information is not disaggregated by group (ethnic groups, gender, SES, etc).  6.4.4 provides a breakdown of the ethnicities of students taking alternate assessments by content area, but not the performance of these groups of students.  6.4.2 provides examples and interpretive information for individualized reports. Subdomains are reported within each content area, addressing specific academic needs. Whether these needs provide valid and reliable information is difficult to evaluate without evidence of validity and reliability included in this review. For example, it is often the case with alternate assessments that subdomain scores correlate at a range that is unacceptable for being reported as measuring different constructs or domains. It is unknown whether that is the case for DLM and the subdomain scores being reported. The state did not provide in other critical elements the documentation needed to allow peers to determine if the subscales are meaningful enough to help educators and others identify the specific learning needs of the student.  6.4.5a-d collectively show individualized score reports, with interpretive information in English and in Spanish, providing guidance to both parents and teachers. Scores are reported in terms of alternate academic achievement standards and levels. The information is understandable and uniform.  It is unclear from the provided information how a parent who does not speak English or Spanish would access the material, how a parent with a disability would request information in an alternate format, or what the timeline for reporting is.  Question about 6.4.3: What is DCAS-Alt-1? How is this related to DLM assessments? DLM is not included in this document about reporting.  Although the state deferred to DLM, peers did not locate evidence describing timeliness of reports to parents and teachers or aggregate reports that provide diagnostic information for ongoing educational decision making. |
| Section 6.4 Summary Statement | | |
| \_X\_\_ The following additional evidence is needed/provide brief rationale:   * Documentation on how to request alternative forms of the parent report beyond English and Spanish versions (i.e., additional languages or other formats). * Timelines for reporting to parents and the public. * Disaggregated reports of student performance. | | |

# SECTION 7: LOCALLY SELECTED NATIONALLY RECOGNIZED HIGH SCHOOL ACADEMIC ASSESSMENTS

(if applicable; evidence for this section would be submitted in ADDITION to evidence for sections 1 through 6)

## Critical Element 7.1 – State Procedures for the Use of Locally Selected, Nationally Recognized High School Academic Assessments

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| The State has established technical criteria to use in its review of any submission of a locally selected, nationally recognized high school academic assessment. The State has completed this review using its established technical criteria and has found the assessment meets its criteria **prior to** submitting for the Department’s assessment peer review.  The State’s technical criteria include a determination that the assessment:   * Is aligned with the challenging State academic standards; and * Addresses the depth and breadth of those standards.   AND | N/A | N/A |
| The State has procedures in place to ensure that a district that chooses to use a nationally recognized high school academic assessment administers the same assessment to all high school students in the district except for students with the most significant cognitive disabilities who may be assessed with an AA-AAAS. |  |  |
| AND  The technical criteria established by the State in reviewing a locally selected, nationally recognized high school academic assessment must ensure that the use of appropriate accommodations does not deny a student with a disability or an EL—   * The opportunity to participate in the assessment; and * Any of the benefits from participation in the assessment that are afforded to students without disabilities or students who are not ELs. |  |  |
| Section 7.1 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

## Element 7.2 –State Monitoring of Districts Regarding the Use of Locally Selected, Nationally Recognized High School Academic Assessments

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| The State must have procedures in place to ensure that:  **Before** a district requests approval from the State to use a nationally recognized high school academic assessment, the district notifies all parents of high school students it serves—   * That the district intends to request approval from the State to use a nationally recognized high school academic assessment in place of the statewide academic assessment; * Of how parents and, as appropriate, students may provide meaningful input regarding the district’s request (includes students in public charter schools who would be included in such assessments); and * Of any effect of such request on the instructional program in the district. | N/A | N/A |
| Section 7.2 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

## Element 7.3 –Comparability of the Locally Selected Nationally Recognized High School Academic Assessments with the State Assessments

| **Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence** |
| --- | --- | --- |
| The locally selected, nationally recognized high school academic assessment:   * Is equivalent to or more rigorous than the statewide assessment, with respect to— * The coverage of academic content; * The difficulty of the assessment; * The overall quality of the assessment; and * Any other aspects of the assessment that the State may establish in its technical criteria; * Produces valid and reliable data on student academic achievement with respect to all high school students and each subgroup of high school students in the district that— * Are comparable to student academic achievement data for all high school students and each subgroup of high school students produced by the statewide assessment at each academic achievement level; * Are expressed in terms consistent with the State’s academic achievement standards; and * Provide unbiased, rational, and consistent differentiation among schools within the State for the purpose of the State determined accountability system including calculating the Academic Achievement indicator and annually meaningfully differentiating between schools. | N/A | N/A |
| Section 7.3 Summary Statement | | |
| \_\_\_ No additional evidence is required or  \_\_\_ The following additional evidence is needed/provide brief rationale:   * [list additional evidence needed w/brief rationale] | | |

1. 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-1)
2. See the full regulation at 34 CFR § 200.6(d) (online at <https://www.ecfr.gov/cgi-bin/text-idx?SID=07e168e9e7a6c5931b4549cc15547ee9&mc=true&node=se34.1.200_16&rgn=div8>) [↑](#footnote-ref-2)
3. Although all students with disabilities must be included in a State’s assessment system, requirements for public reporting in ESEA section 1111(h)(1)(C)(ii) apply only to children with disabilities as defined in section 602(3) of the IDEA. [↑](#footnote-ref-3)
4. 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-4)
5. See the full regulation at 34 CFR § 200.6(d) (online at <https://www.ecfr.gov/cgi-bin/text-idx?SID=07e168e9e7a6c5931b4549cc15547ee9&mc=true&node=se34.1.200_16&rgn=div8>) [↑](#footnote-ref-5)
6. Although all students with disabilities must be included in a State’s assessment system, requirements for public reporting in ESEA section 1111(h)(1)(C)(ii) apply only to children with disabilities as defined in section 602(3) of the IDEA. [↑](#footnote-ref-6)
7. 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-7)
8. See the full regulation at 34 CFR § 200.6(d) (online at <https://www.ecfr.gov/cgi-bin/text-idx?SID=07e168e9e7a6c5931b4549cc15547ee9&mc=true&node=se34.1.200_16&rgn=div8>) [↑](#footnote-ref-8)
9. Although all students with disabilities must be included in a State’s assessment system, requirements for public reporting in ESEA section 1111(h)(1)(C)(ii) apply only to children with disabilities as defined in section 602(3) of the IDEA. [↑](#footnote-ref-9)