

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

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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.

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If you have any questions, please contact my staff at: <u>OESE.Assessment@ed.gov</u>.

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	For the Delaware Communications Portfolio Summary (DCPS):		
Assessments (all	• Evidence that clarifies the use of the DCPS in the context of alternate assessments of		
assessments)	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	For the SAT:		
and Development	• 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	For the SAT:		
Development	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	For the SAT:		
Validity, including Validity Based on	• Evidence requested in critical element 2.1 will satisfy this critical element.		
Content	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	For the SAT:		
Based on Cognitive Processes	• 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	For the SAT:		
Based on Internal Structure	• 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.		

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Critical Element	Evidence Needed
3.4 – Validity based	For DeSSA-Alt in science:
on Other Variables	• 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	For DeSSA-Alt in science:
accessibility	 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	For DeSSA-Alt in science:
Analysis and Ongoing Maintenance	• 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 DeSSA-Alt:
for Including Students with Disabilities (all assessments)	 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 the SAT:
for Including	Documentation of guidance regarding the selection of appropriate accommodations for English learning.
English Learners	for English learners. For the SAT:
5.3 – Accommodations	 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.

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Critical Element Evidence Needed			
	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	For DeSSA-Alt:		
Test Administration for Special Populations	 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	For DeSSA-Alt in science:		
Standards-Setting	• 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	For the SAT:		
and Aligned	• Evidence of how the academic achievement standards are challenging and aligned		
Academic Achievement	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		
Standards	know and be able to do by the time they graduate from high school in order to		
	succeed in college and the workforce.		
	For Doss A Alt.		
	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 		

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Critical Element	Evidence Needed	
	 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	Comments/Notes/Questions/Suggestions Regarding
	reference)	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	No additional evidence required per August 2018 letter to CSDE for SAT	
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 8 th 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.			
Se	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	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	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: o 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. o If a State has developed native language assessments for ELs in		
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.		
0	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.		
Section 1.4 Summary Statement			
No additional evidence is required or			
The	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	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
If the State has developed or amended	State-specific; not applicable.	
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.		
Section 1.5 Summary Statement		
No additional evidence is required or		
The following additional evidence is no	•	
• [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	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	reference) Evidence Document:	Additional evidence requested for the SAT:
The State's test design and test	2.1.a SAT User Group Geometry Review Discussion	A plan and a timeline to address the alignment
development process is well-suited for the	of math, specifically geometry, alignment took place at a	issues identified in the existing alignment studies,
content, is technically sound, aligns the	meeting of state partners and College Board. The	particularly in mathematics.
assessments to the depth and breadth of	analysis resulting from this discussion is included to	particularly in mathematics.
the State's academic content standards	show the ongoing work to ensure the SAT is well	2.1.a SAT User Group Geometry Review
for the grade that is being assessed and	aligned with state standards and classroom expectations.	After a February 27, 2019 meeting with States,
includes:	SAT state partners have conducted independent	College Board wrote a response indicating how the
• Statement(s) of the purposes of the	alignment studies with UConn, HumRRO, and	geometry content is selected for the SAT. Delaware,
assessments and the intended	WebbAlign using SAT test forms and item data as a	Michigan, Connecticut, New Hampshire, Maine, Illinois,
interpretations and uses of results;	resource. We are submitting some examples of these	Rhode Island "agreed that the alignment of the SAT Math
Test blueprints that describe the	documents to be clear that states using the SAT are not	Test to state standards is satisfactory and adequately meets
structure of each assessment in	relying on vendor produced alignment reports to support	their assessment needs" to which College Board provided a
sufficient detail to support the	future submissions by state's using SAT.	summary of the alignment study results, a summary of how
development of assessments that are	Evidence Documents:	the SAT assesses state high school mathematics standards,
technically sound, measure the depth	2.1.b Connecticut SAT Alignment Report Final	and a rationale for why the alignment is sufficient.
and breadth of the State's grade- level academic content standards	June 2016	The rationale stated "there are questions derived from the
and support the intended	2.1.c SAT Alignment Final Report_DE	CCSS high school geometry standards that will align to
interpretations and uses of the results.	2.1.d SAT Alignment Final Report_Maine	other SAT Math Test domains. Therefore, students who
 Processes to ensure that each 	2.1.e WV DRAFT alignment report 12_06_2018	take the SAT Math Test may be exposed to questions that
academic assessment is tailored to the	Evidence Document:	are aligned to the six CCSS conceptual categories under
knowledge and skills included in the	2.1.f SAT Assessment Reporting	high school geometry." The text is intended to provide
State's academic content	Question Analysis screenshot referenced in the notes	evidence that the geometry content assessed on the SAT
standards, reflects appropriate	section. Score reporting resources allow teachers and	Math Test requires a deep understanding of existing high
inclusion of challenging content, and	students to see the content and state specific standards	school geometry standards and is therefore assessing an
requires complex demonstrations or	alignment of each item as part of the reporting process	acceptable breadth of the geometry state standards.
applications of knowledge and skills		
(i.e., higher-order thinking skills).		Page 2 states the independent alignment studies had
If the State administers computer-		different results. Even though the results confirm weak
adaptive assessments, the item pool		alignment to geometry and functions, SAT describes some
and item selection procedures		of the noted gaps as "intended" (p. 3), which makes it
adequately support the test design		sound as though the SAT has not changed the content but
1 7 11		has studied it and defends the quality of the geometry items

- and intended uses and interpretations of results.
- If the State administers a computeradaptive 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.

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 issues.	nent studies.

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.	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	

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:		
	nically sound procedures to develop and select items to a stent and cognitive process, including higher-order think	assess student achievement based on the State's academic king skills.
• Final HumRRO SAT Cognitive Lab Report.		

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.	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 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	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%.

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 Stateprovided

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.

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

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 ne Ilist additional evidence needed w/	-	

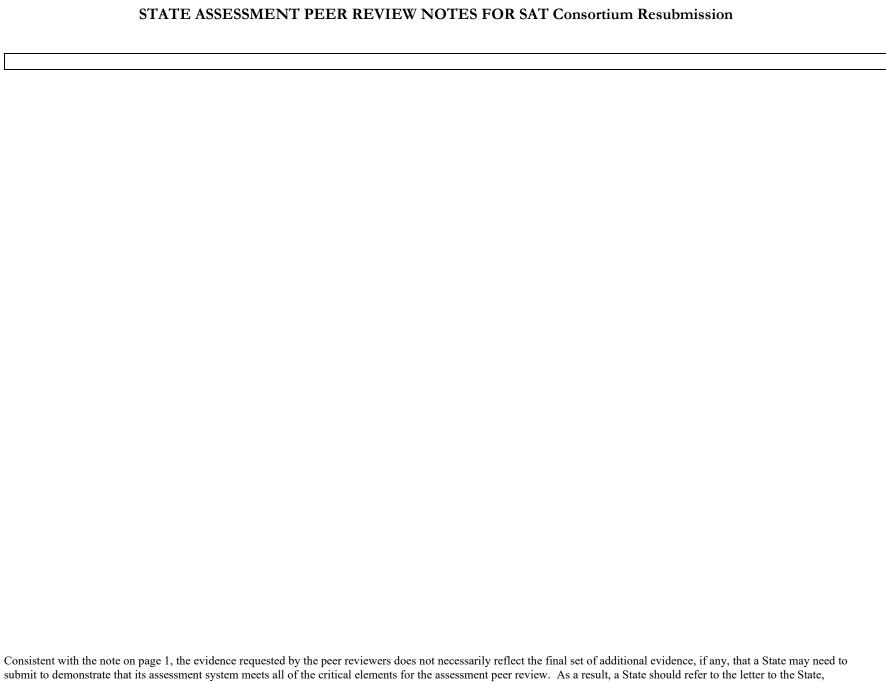
Critical Element 2.5 – Test Security

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	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. Section 2.5 Summary Statement	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 V. No additional axidence is required from SAT		

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

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	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	No additional evidence required per August 2018 letter to CSDE for SAT	
groups. Section 2.6 Summary Statement		
No additional evidence is required or		
The following additional evidence is no	•	
• [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	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State has documented adequate overall validity evidence for its assessments consistent with nationally recognized professional and technical testing standards. The State's validity evidence includes evidence that: 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	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_DE 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.

and cognitive complexity determined in test design to be appropriate for students with the most significant cognitive disabilities.			
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

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State has documented adequate validity evidence 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

The State has documented adequate validity evidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State's academic content standards. Evidence Documents: 3.3.a SAT Suite Technical Manual Appendixes (October)	cumentation or Evidence all evidence requested for the SAT: ce that the scoring and reporting structures sessments are consistent with the sub- structures of the State's academic content
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.	te that the scoring and reporting structures sessments are consistent with the sub-
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. The HU the substitute of the sub	AT Alignment Final Report_DE However, reporting the subscores does not provide al information, statistically, above and beyond the ion offered through the total score used alone. ution should be used in placing too much emphasis er-interpreting what the subscores mean regarding and weaknesses of a student. This cautionary needs to be disseminated down to principals, and anyone who may use the subscores; the semany be misleading if used alone." AT Suite Technical Manual Appendixes er) In evidence that subscores are correlated with each expected (math subscores with each other, ELA se with each other). MRRO study illuminated some of the issues with cores, particularly within the math section. Also, relying issues with these validity critical elements ed to and measure "state's academic standards" e assessment does not appear to be well aligned. But Alignment Final Report_Details and beyond the interpretation of the issues with cores, particularly within the math section. Also, relying issues with these validity critical elements ed to and measure "state's academic standards" e assessment does not appear to be well aligned. But Alignment Final Report_Details and beyond the interpretation of

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

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State has documented adequate validity evidence 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	Comments/Notes/Questions/Suggestions Regarding
The State has documented adequate reliability evidence for its assessments for the following measures of reliability for the State's student population overall and each student group consistent with nationally recognized professional and technical testing standards. If the State's assessments are implemented in multiple States, measures of reliability for the assessment overall and each student group consistent with nationally recognized professional and technical testing standards, including: 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	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	State Documentation or Evidence 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.
produce test forms with adequately precise estimates of <u>a student's</u> academic achievement.		4.1.d 2018 Connecticut SAT Subgroup Reliability

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Citical Element	reference)	State Documentation or Evidence
		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 State	ement	
Section in Summary State		

- _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

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	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 definition¹). 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 4.7.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.

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

	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	

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 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

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

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	No additional evidence required per August 2018 letter	
academic assessments within a content	to CSDE for SAT	
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.		
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

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 paperbased 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 not experience. • [list additional evidence needed water the experience]		

Critical Element 4.7 – Technical Analysis and Ongoing Maintenance

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State:	Evidence Documents:	Additional evidence requested for the SAT:
Has a system for monitoring,	4.7.a Connecticut 2018 TA Report	Evidence of a system for monitoring and
maintaining, and improving, as	4.7.b Delaware 2018 SAT Total Group TA Report	maintaining, and improving as needed, the quality
needed, the quality of its assessment	4.7.c CSDE Debrief Meeting Notes 051818_SAT	of its assessment system, including clear and
system, including clear and		technically sound criteria for the analyses of all of
technically sound criteria for the		the assessments in its assessment system.
analyses of all of the assessments in		4.7.a Connecticut 2018 TA Report
its assessment system (i.e., general		4.7.b Delaware 2018 SAT Total Group TA Report
assessments and alternate		These reports do not indicate that these are used for
assessments), and		monitoring, maintaining, and improving the quality of
Evidence of adequate technical		the assessment system.
quality is made public, including on the State's website.		the abbosoment by stem.
the state's website.		Documents provide states with appropriate data for judgin
		the performance of their students and subgroups of studen
		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
		make changes, and technically sound criteria for analysis
		the assessment are not included. This seems to meet
		monitoring component, but not maintaining and improvin
		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		
 System for maintaining, and imp 	 _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	Comments/Notes/Questions/Suggestions Regarding
	,	
Critical Element 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	Evidence (Record document and page # for future reference) 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	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence 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
cognitive functioning and adaptive behavior; • Provide information for IEP Teams to		accommodations or supports; however, they may not result in college- or scholarship-reportable scores.
inform decisions about student assessments that:		2.3.c CSDE-Test-Day-Training-2272019

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
o Provides a clear explanation of		p. 37 lists accommodations that are "Used for state
the differences between		accountability system and college admission."
assessments aligned with grade-		Evidence that students with disabilities are not denied
level academic achievement		the opportunity to participate in the assessment and
standards and those aligned		any benefits from participation in the assessment.
with alternate academic		
achievement standards,		Since this is a CT document, it is not clear if this policy
including any effects of State		applies to all states in this consortium.
and local policies on a student's		••
education resulting from taking		
an AA-AAAS, such as how		
participation in such		It is recommended that States review the accommodation
assessments may delay or		guidelines for college-reportable scores with IEP teams.
otherwise affect the student		gardennes for conego reperment secret with 121 tourner
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		
State's academic content standards		

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
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		
Section 5.1 Summary Statement		
<u>*</u>		
X The following additional evidence is	needed from States	

States follow procedures to request SAA be college-reportable.

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

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

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
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.

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		• 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	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State makes available appropriate		Additional evidence requested for the SAT:
accommodations and ensures that its	Evidence Documents:	Evidence that the State has determined that the
assessments are accessible to students	2.3.a SAT-School Day Accommodated Testing	accommodations it provides (i) are appropriate and
with disabilities and ELs, including ELs	Manual State-Provided	effective for meeting the individual student's
with disabilities. Specifically, the State:	Policy from College Board state user accommodated	need(s) to participate in the assessments, (ii) do not
 Ensures that appropriate 	testing manual is provided to show College Board policy	alter the construct being assessed, and (iii) allow
accommodations, such as,	and procedures are consistent with requirements. This	meaningful interpretations of results and
interoperability with, and ability to	manual, or a state specific one with similar content, is	comparison of scores for students who need and
use, assistive technology, are	sent to every testing site, weeks before testing, so staff	receive accommodations and students who do not
available to measure the academic	can be trained.	need and do not receive accommodations.
achievement of students with	Page 8 includes a table matching the accommodations	
disabilities.	with testing conditions so educators can make informed	Evidence as described in USED Assessment Peer Review
 Ensures that appropriate 	choices about the most appropriate choice for each	Process, p 64, is not provided.
accommodations are available for	student	
ELs;	Pages 12-13 cover the special materials required for	SAT supplies states with appropriate state-level reports to
Has determined that the	each accommodation so educators can make informed	show how students with and without accommodations
accommodations it provides (1) are	choices about the most appropriate choice for each	perform on the SAT. However, none of the evidence
appropriate and effective for meeting	student	supplied for this review showed how states or SAT officials
the individual student's need(s) to	2.3.c CSDE-Test-Day-Training-2272019	compare results of students receiving and not receiving
participate in the assessments, (2) do	This presentation from a required training, publication in	accommodations performed on the SAT.
not alter the construct being assessed,	the state's assessment newsletter, and inclusion on the	No evidence justifies how states or the College Board
and (3) allow meaningful	states Web site is typical of SAT state user's	conclude that assigned accommodations were effective or
interpretations of results and	communication process.	not for meeting students' needs or for interpreting results.
comparison of scores for students	Pages 37-57 cover the processes necessary to select and	
who need and receive	register the most appropriate accommodations for each	2.3.a SAT-School Day Accommodated Testing Manual
accommodations and students who	student; all students are provided the opportunity to	State-Provided, p. 8. Information about accommodations
do not need and do not receive	participate and have a college reportable score under	allowed. Notes from College Board about how exceptions
accommodations;	these policies	are handled – but no real documentation.
Has a process to individually review		
and allow exceptional requests for a		2.3.c CSDE Test Day Training addresses more procedural
small number of students who require		details, but not how accommodations are appropriate and
accommodations beyond those		effective.
routinely allowed.		
• Ensures that accommodations for all		
required assessments do not deny		

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
students with disabilities or ELs the opportunity to participate in the assessment and any benefits from participation in the assessment.		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	Comments/Notes/Questions/Suggestions Regarding
	reference)	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.

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
		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.

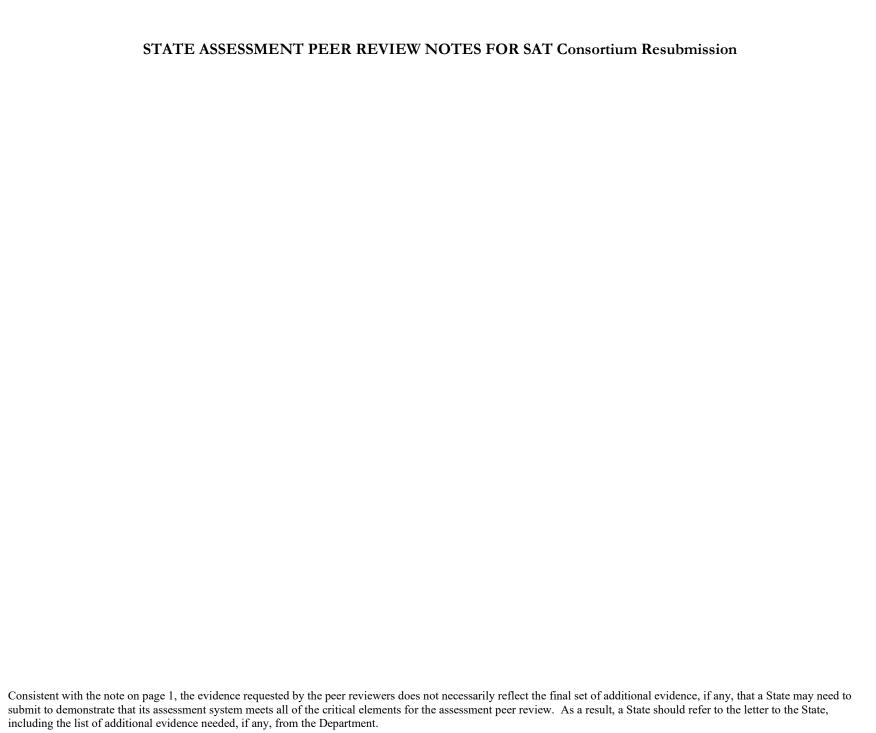
Section 5.4 Summary Statement

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	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
For academic content standards:	No additional evidence required per August 2018 letter to CSDE for SAT	
The State formally adopted challenging	to CSDE for SAT	
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.		
Section 6.1 Summary Statement	<u> </u>	1
No additional evidence is required or		

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The following additional evidence is no [list additional evidence needed w.	<u>.</u>	

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:	No additional evidence required per August 2018 letter to CSDE for SAT	
Academic achievement standards and, as applicable, alternate academic achievement standards.		
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	Comments/Notes/Questions/Suggestions Regarding
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	Evidence (Record document and page # for future reference) 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	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence 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.

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
postsecondary education or competitive integrated employment.		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 Floment 6.4 Departing

content assessments that:

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,	Individual score reports are delivered by College Board to every student tested within weeks of test administration. Evidence Documents:	Additional evidence requested for the SAT: Evidence of reporting that facilitates timely, appropriate, credible, and defensible interpretations and uses of results for students
and defensible interpretations and uses of those results by parents, educators, State officials, policymakers and other stakeholders, and the public.	6.4.a understanding sat scores6.4.b understanding sat scores SpanishThese documents describe the key elements of the	tested by parents, educators, State officials, policymakers and other stakeholders, and the public, including:
The State reports to the public its assessment results on student academic achievement for all students and each	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	1. The production and delivery of individual student interpretive, descriptive, and diagnostic reports after each administration of its assessments that:
student group at each achievement level ³	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	1.a. Report the student's achievement in terms of the State's grade-level academic achievement standards (including performance-level
For <u>academic content assessments</u> , the State reports assessment results, including itemized score analyses, to districts and	in the SAT administration. The SAT Data File Layout tab provides each element with values and comments; student name, school, and	descriptors); 3.3.c Delaware parent report
schools so that parents, teachers, principals, and administrators can interpret the results and address the	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	Includes a sample report based on the state's achievement levels and broad performance-level descriptors.
specific academic needs of students, and the State also provides interpretive guides to support appropriate uses of the assessment results.	especially important for timely turn-around of this report for state purposes. 3.3.d skills insight sat suite	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
The State provides for the production and delivery of individual student interpretive, descriptive, and	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	mention of student achievement in terms of the State's grade-level academic achievement standards.
diagnostic reports after each administration of its academic	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.	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

achievement of particular skills and the state standards are

only directly available to teachers, who have access to a

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.

Critica	Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
0	Provide valid and reliable		mapping between the SAT framework and the state
	information regarding a		standards.
	student's academic		That said, it appears that teachers have to do the work of
	achievement;		interpreting each student's score in terms of the standards
0	Report the student's academic		The evidence indicates that individual reports are
	achievement in terms of the		interpretive and descriptive of students' overall domain
	State's grade-level academic		competence, according to the SAT framework. The
	achievement standards;		evidence does not indicate that individual reports may be
0	Provide information to help		easily interpreted in terms of the state standards nor may
	parents, teachers, and principals		they assist in diagnosing students' particular strengths or
	interpret the test results and		weaknesses.
	address the specific academic		
	needs of students;		Some state reports include four achievement levels with
0	Are provided in an		performance descriptors per domain as a reference for
	understandable and uniform		students and parents to interpret individual scores.
	format;		However, such information is insufficient for identifying
0	Are, to the extent practicable,		how to support student continued progress.
	written in a language that parents		
	and guardians can understand or,		3.3.d Skills Insight SAT Suite
	if it is not practicable to provide		Provides lists of skills and concepts associated with each
	written translations to a parent or		score range. These lists are not presented in terms of the
	guardian with limited English		state content standards. Furthermore, the lists represent
	proficiency, are orally translated		typically the skills that a particular score indicates, not th
	for such parent or guardian;		skills a particular student has or lacks based on their item
0	Upon request by a parent who is		responses. This document does not refer to student's
	an individual with a disability as		achievement in terms of the State's grade-level academic
	defined by the ADA, as		achievement standards.
	amended, are provided in an		
	alternative format accessible to		States must provide this evidence.
	that parent.		
	e State follows a process and		
	eline for delivering individual		
	dent reports to parents, teachers,		
	principals as soon as practicable		
afte	er each test administration.		

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or 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

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		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
TI 0 1	N/A	N/A
The State has established technical	17/1	11/11
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		
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		

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
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 no	•	
[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	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State must have procedures in place to ensure that:	N/A	N/A
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.		

No additional evidence is required or

The following additional evidence is needed/provide brief rationale:

• [list additional evidence needed w/brief rationale]

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence

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 level of the second of the	N/A	N/A
The locally selected, nationally recognized high school academic assessment:		
• Is equivalent to or more rigorous than the		
statewide assessment, with respect to—		
o The coverage of academic content;		
o 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.		

Critical Element Evidence (Record document and page # for future reference) Comments/Notes/Questions/Suggestions Reg		Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
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:		Not addressed in this submission
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.		
Section 1.1 Summary Statement		
 No additional evidence is required or The following additional evidence is no [list additional evidence needed was 	1	

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 no [list additional evidence needed w/		

Critical Element 1.3 – Required Assessments

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	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).		Not addressed in this submission.
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-		
 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	1	
take the State end-of-course	1	
mathematics test instead.		
The Department may have approved	1	
the State, under the Innovative	1	
Assessment Demonstration	1	
Authority, to permit students in some	1	
LEAs to participate in a	1	
demonstration assessment system in	1	
lieu of participating in the State		
assessment.		
Section 1.3 Summary Statement		
No additional evidence is required or		
The following additional evidence is no	eeded/provide brief rationale:	
• [list additional evidence needed w	/brief rationale]	
	J	

Critical Element 1.4 – Policies for Including All Students in Assessments

	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
Critical Element 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		
language assessments for ELs in R/LA, ELs must be assessed in R/LA in English if they have		

	language assessments for a		
	period not to exceed two		
	additional consecutive years.		
0	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.		
Sectio	n 1.4 Summary Statement		
No	additional evidence is required or		
The	e following additional evidence is ne	eeded/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	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
If the State has developed or amended		Not addressed in this submission.
challenging <u>academic</u> 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.		
Section 1.5 Summary Statement		
No additional evidence is required or		
The following additional evidence is ne	•	
 [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	Comments/Notes/Questions/Suggestions Regarding
Citical Element	reference)	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 gradelevel 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	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.

_		·	
	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 <i>entirely</i> administered		
	through a portfolio.		
	Section 2.1 Summary Statement		
	X_ The following additional evidence is a • A plan and a timeline to address th • See SAT peer review notes.	needed/provide brief rationale: e alignment issues identified in the existing alignment studie	es.

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:	Statement that the college board will provide the necessary evidence	State deferred to evidence provided by the College Board
 Assess student achievement based on the <u>State's academic content</u> <u>standards</u> in terms of content and cognitive process, including higher- order thinking skills. 		

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

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 administrate assessments.	Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
procedures for standardized test administration; specifically, the State: Has established and communicates to educators clear, thorough and consistent standardized procedures for the 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 for all students with disabilities; If the State administration in its standardized procedures for test administration in its standardized procedures for test administration, and established contingency plans to address possible		reference)	State Documentation or Evidence
administration.	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	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	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.)

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		Not addressed in this submission.
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.		
Section 2.4 Summary Statement		
No additional evidence is required or		
The following additional evidence is no	eeded/provide brief rationale:	
 [list additional evidence needed was 	/brief rationale]	

Critical Element 2.5 – Test Security

Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
,	State Documentation or Evidence
2.5.1a page 13	The state appears to have reporting procedures for test
0.5.1	irregularities and security breaches for assessments.
2.5.1.a	D 4 4' C - '4-1 1 1' 4 1
2516	Detection of security breaches are covered in the evidence, however the remediation following a breach is not clear.
2.3.1.0	The responses appear to assume local issues will not cause
252a	major security breaches.
2.3.2.4	magor security oreaches.
2.5.3 and a few others all document forms and training	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.
	Evidence (Record document and page # for future reference) 2.5.1a page 13 2.5.1.b 2.5.2.a 2.5.3 and a few others all document forms and training

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	Comments/Notes/Questions/Suggestions Regarding
Circui Diement	reference)	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		Not addressed in this submission.
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.		
Section 2.6 Summary Statement		

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 validity evidence for its assessments consistent with nationally recognized professional and technical testing standards. The State's validity evidence includes evidence that:	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.
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.		
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 validity evidence 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 • See SAT peer review notes.	needed/provide brief rationale:	

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 validity evidence 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 validity evidence 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	
Section 4.1 Summary Statement	Section 4.1 Summary Statement		
X_ The following additional evidence is A plan to address the lower reliabili Reliability evidence for students wh See SAT peer review notes.	ty estimates for SWD and EL students than the general popu	alation.	

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).	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.
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.		

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.

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

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.	reterencey	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	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
If the State administers multiple forms of		No evidence provided as part of this review
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.		
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]		
- Inst additional evidence needed w/	oner ranonalej	

Critical Element 4.6 – Multiple Versions of an Assessment

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
If the State administers any of its assessments in multiple versions within a subject area (e.g., online versus paperbased 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 no [list additional evidence needed water the content of the content o	•	

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	reterencey	No evidence provided as part of this review
quality is made public, including on the State's website.		
Section 4.7 Summary Statement No additional evidence is required or		
The following additional evidence is not experience of the following additional evidence needed with the following additional evidence needed with the following additional evidence needed with the following additional evidence is required to the following additional evidence is not evidence in the following additional evidenc		

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	Comments/Notes/Questions/Suggestions Regarding
O 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	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence 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.
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		

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
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		
200.0(d).		

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.

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)

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

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	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.	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.

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		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	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
The State makes available appropriate	A variety of evidences were submitted.	None of the provided evidence takes the form of a study
accommodations and ensures that its		demonstrating the validity or reliability of scores for SWD
assessments are accessible to students	☐ Document 5.3.1 DDOE Website-SAT	or EL students. Furthermore, the documents continue to
with disabilities and ELs, including ELs	Accommodations	discuss non-reportable scores for students receiving
with disabilities. Specifically, the State:	☐ Document 5.3.2 SAT Accommodations	accommodations. This leads the reviewer to believe that
Ensures that appropriate	Updates_2017	certain SWD or EL students will be denied some benefit of
accommodations, such as,	☐ Document 5.3.3 SSDC Implementation Handbook	the assessment that students without disabilities receive, in
interoperability with, and ability to	With SAAs	the form of scores that make them eligible for scholarships
use, assistive technology, are	☐ Document 5.1.2a CB Accommodations Webinar	or reporting to colleges for admission decisions.
available to measure the academic	2018 DE 12-01-17 (slides 8-10).	
achievement of students with		The following documents describe policy and procedures
disabilities.		around selecting accommodations:
Ensures that appropriate		5.3.1 DDOE Website-SAT Accommodations
accommodations are available for		5.3.2 SAT Accommodations Updates_2017
ELs;		5.3.3 SSDC Implementation Handbook With SAAs
Has determined that the		5.1.2a CB Accommodations Webinar 2018 DE 12-01-17
accommodations it provides (1) are		
appropriate and effective for meeting		The documents do not describe any data-based evidence
the individual student's need(s) to		(i.e., research or evaluation) of the effectiveness of
participate in the assessments, (2) do		accommodations once used. Such evidence is necessary to
not alter the construct being assessed,		show accommodations have been appropriate, preserve the
and (3) allow meaningful		construct, and allow meaningful interpretations.
interpretations of results and		
comparison of scores for students		5.1.2a CB Accommodations Webinar 2018 DE 12-01-17
who need and receive		slide 9 refers to State Allowed Accommodations which are
accommodations and students who		not college reportable. This policy may violate the equal
do not need and do not receive		protection clause by removing one of the benefits of
accommodations;		participation in the assessment from some students.
Has a process to individually review		
and allow exceptional requests for a		Training documents provided for 5.1 with the materials
small number of students who require		cited here supply educators with information about how to
accommodations beyond those		assign accommodations for instruction and assessment.
routinely allowed.		SAT has a substantial process for reviewing requests for
Ensures that accommodations for all		accommodations, including construct-interference
required assessments do not deny		considerations and reviews by psychometricians to assure

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
students with disabilities or ELs the opportunity to participate in the assessment and any benefits from participation in the assessment.		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	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State monitors test administration in		No evidence provided as part of this review
ts districts and schools to ensure that		
ppropriate assessments, with or without		
ccommodations, are selected for all		
tudents with disabilities and ELs so that		
ney are appropriately included in		
ssessments and receive accommodations		
nat 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.		
Section 5.4 Summary Statement	·	
No additional evidence is required or		
1.5 additional of identice is required of		

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The following additional evidence is ne • [list additional evidence needed w/	-	

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	Comments/Notes/Questions/Suggestions Regarding
Citical Element	reference)	State Documentation or Evidence
For academic content standards:		No evidence provided as part of this review
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.		
Section 6.1 Summary Statement	1	
No additional evidence is required or		

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The following additional evidence is no [list additional evidence needed w.	<u>.</u>	

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:		No evidence provided as part of this review
• Academic achievement standards and, as applicable, alternate academic achievement standards.		
Section 6.2 Summary Statement		
No additional evidence is required or The following additional evidence is no	eeded/provide brief rationale:	
[list additional evidence needed w.]		

Critical Element 6.3 – Challenging and Aligned Academic Achievement Standards

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
For academic achievement standards:	6.3a a national study that does not address DE specific standards.	DE does not provide a study demonstrating the SAT is aligned to the DE 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	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	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

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
postsecondary education or competitive integrated employment.		

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	Comments/Notes/Questions/Suggestions Regarding
Civical Element	reference)	State Documentation or Evidence
The State reports its assessment results for all students assessed, and the reporting	6.4.2	6.4.2 does not provide goal nor objective level reporting for the state's standards in ELA nor Math.
facilitates timely, appropriate, credible, and defensible interpretations and uses of those results by parents, educators, State officials, policymakers and other	- Document 2.5.4 DTC Meeting 04-17-2019 (slide 25 - <i>Student and Educator Score releases</i>) - Document 6.4.1 DE-SAT Score Release Dates	2.5.4 DTC Meeting 04-17-2019 and 6.4.1 DE-SAT Score Release Dates address the timeline for providing individualized scores.
stakeholders, and the public.	- Document 6.4.2 Delaware parent report	6.4.2 Delaware parent report provides instructions for interpreting the assessment results.
The State reports to the public its	- Document 5.1.2 Parent consent forms-	
assessment results on student academic	Accommodations	6.4.3 SAA Student score report-Accommodations provides
achievement for all students and each	- Document 6.4.3 SAA Student score report-	reports and interpretive information for students.
student group at each achievement	Accommodations.	
<u>level</u> ⁶		5.1.2 Parent consent forms-Accommodations may violate
		the equal protection clause by removing one of the benefits
For <u>academic content assessments</u> , the		of participation in the assessment from some students.
State reports assessment results, including		
itemized score analyses, to districts and		Evidence of defensible interpretation of the subscale scores
schools so that parents, teachers,		is not provided. On previous review, the point was made
principals, and administrators can		intercorrelations among subscale scores are too high,
interpret the results and address the		indicating they do not represent unique constructs.
specific academic needs of students, and		
the State also provides interpretive guides		Evidence provided indicates that the SAT supplies score
to support appropriate uses of the		information directly to student accounts within a few weeks
assessment results.		of testing.
• The State provides for the production		
and delivery of individual student		Delaware issues enhanced individual reports in July. These
interpretive, descriptive, and		reports show how SAT scores map onto domain
diagnostic reports after each		achievement levels.
administration of its academic		
content assessments that:		

-

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.

Critic	al Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
0	Provide valid and reliable	reference)	SAT-supplied reports contain subscore information which
O	information regarding a		provides parents or students with some information about
	student's academic		strengths and weaknesses in terms of the SAT framework.
	achievement;		strengths and weaknesses in terms of the SAT framework.
0			Reports do not contain information about student progress
O	achievement in terms of the		on the state content standards.
	State's grade-level academic		on the state content standards.
	achievement standards;		English, Spanish, and online reporting tools were described
0			in the SAT evidence. Other formats may be requested,
O	parents, teachers, and principals		according to SAT evidence 6.4.a (SAT pdf "Understanding
	interpret the test results and		your Scores").
	address the specific academic		your scores).
	needs of students;		The date/timeline for delivery of aggregate school/educator
0			data is not clear to the peers.
O	understandable and uniform		data is not clear to the peers.
	format;		The peers did not find a clear discussion of alternate forms
0			of the individual student report.
O	written in a language that parents		of the marriadal stadent report.
	and guardians can understand or,		The subscale scores provided on the report are not the
	if it is not practicable to provide		content subscales based on the state content standards.
	written translations to a parent or		
	guardian with limited English		
	proficiency, are orally translated		
	for such parent or guardian;		
0			
	an individual with a disability as		
	defined by the ADA, as		
	amended, are provided in an		
	alternative format accessible to		
	that parent.		
• T	he State follows a process and		
	meline for delivering individual		
	udent reports to parents, teachers,		
	nd principals as soon as practicable		
	fter each test administration.		

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
C4' (1 C C4-4	_	

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.	N/A	N/A
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		
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		

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
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 Evidence (Record document and page # for future Comments/Notes/Questions/Suggestions Regarding Critical Element **State Documentation or Evidence** reference) N/A N/A 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. **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]

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence

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 levelle educated making the manageria dibide	N/A	N/A
The locally selected, nationally recognized high school academic assessment:		
• Is equivalent to or more rigorous than the		
statewide assessment, with respect to—		
o The coverage of academic content;		
o The difficulty of the assessment;		
o 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.		

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence	
Section 7.3 Summary Statement	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	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	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).		Reviewed as part of the general assessment review.
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.		
Se	Section 1.3 Summary Statement		
,	No additional evidence is required x		

Critical Element 1.4 – Policies for Including All Students in Assessments

he State requires the inclusion of all ablic elementary and secondary school udents in its assessment system and	reference)	State Documentation or Evidence Reviewed as part of the general assessment review.
ablic elementary and secondary school		Reviewed as part of the general assessment review.
early and consistently communicates is 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,		

			
	language assessments for a		
	period not to exceed two		
	additional consecutive years.		
0	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.		
Section 1.4 Summary Statement			
x N	o 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	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	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, ather staff, and paraprate.		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.
other staff, and parents. Section 1.5 Summary Statement		
V		
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	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	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	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.

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.		
Section 2.1 Summary Statement		
X_ The following additional evidence is • See DLM science peer review. • Evidence of alignment between D.	needed/provide brief rationale: E science content standards and the DLM science assessmen	t.

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:	DLM has provided the information relevant to this section.	Relies on DLM meeting this critical element Deferred to DLM
Assess student achievement based on the <u>State's academic content</u> <u>standards</u> in terms of content and cognitive process, including higher-order thinking skills.	DE referred to DLM for this evidence	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	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State implements policies and procedures for standardized test	Some documents were only available on the DLM website.	Training information deferred to DLM.
 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 	DE implements DLM trainings. Refer to DLM documentation for information about the quality of the training materials.	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.
technology challenges during test		
administration.		
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	Comments/Notes/Questions/Suggestions Regarding
Citical Element	reference)	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 appliedif 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	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State has documented adequate overall validity evidence for its assessments consistent with nationally recognized professional and technical testing standards. The State's validity evidence includes evidence that:		No evidence provided by the state for this critical elemen State deferred to DLM for this CE.
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		

and cognitive complexity determined in test design to be appropriate for students with the most significant cognitive disabilities.	
_X The following additional evidence is See DLM science peer review note	

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 validity evidence 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		

<u>Critical Element 3.3 – Validity Based on Internal Structure</u>

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State has documented adequate validity evidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State's 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 validity evidence 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	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State has documented adequate		No evidence provided by the state for this critical element
reliability evidence for its assessments for		
the following measures of reliability for		
the State's student population overall and		Control of the DIMC of CE
each student group consistent with		State deferred to DLM for this CE.
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 <u>a student's</u>		
academic achievement.		

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence	
Section 4.1 Summary Statement	Section 4.1 Summary Statement		
_X The following additional evidence is • See DLM Science peer review not			

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).		No evidence provided by the state for this critical element
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.		
Section 4.2 Summary Statement		

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

• See science DLM peer review notes.

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

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		

• 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	No evidence provided by the state for this critical	State deferred to DLM for this CE.
academic assessments within a content	element	
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.		
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		

• 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	Comments/Notes/Questions/Suggestions Regarding
C1111011 2101110111	reference)	State Documentation or Evidence
The State has in place procedures to	5.1.3b	5.1.3b is a Minnesota document; it does not mention DE.
ensure the inclusion of all public		
elementary and secondary school students	A variety of other documents	There is no provided evidence that the state monitors,
with disabilities in the State's assessment		reviews, or otherwise has systemic methods to ensure
system. Decisions about how to assess	- Document 1.3.1 DE Administrative Code_Title 14_	students using the alternate assessment have the assessment
students with disabilities must be made by	Education, Section 151 Paragraph f (p.18); and	as part of their IEP, LEP or 504 plan; nor that the
a student's IEP Team under IDEA, the	Paragraph j (p.19) Subchapter III (pp.18-19) Section 151	accommodations used are the same as used during
placement team under Section 504, or the	Paragraphs a through f.	instruction.
individual or team designated by a district	- Document 5.1.1a About the DeSSA-Alt for Parents	
to make that decision under Title II of the	- Document 5.1.1b DeSSA-Alt Website	There does not appear to be a single document that explains
ADA, as applicable, based on each		the differences of the assessments and the resulting
student's individual abilities and needs.	- Document 2.3.2d DeSSA-Alt Revised Participation	outcomes for parents.
	Guidelines Form (p.126) Appendix F-1 includes	
	statement for parents to understand the repercussions of	The documents mix DE GBEs and DLM essential elements
If a State adopts alternate academic	participating in the Alternate assessment)	and appear to contradict each other. The peers suggest
achievement standards for students with		updating the complete set of documents to reflect the
the most significant cognitive disabilities	- Document 2.3.2c DOE-Approved Process	current practice or writing a single all-encompassing
and administers an alternate assessment	Accessibility Guidelines and Appendix Training	current document.
aligned with those standards under ESEA	2018. Coordinators how to request special	
section 1111(b)(1)(E) and (b)(2)(D),	accommodations for our students on the general	From the provided documentation, it is unclear to the peers
respectively, the State must:	assessment.	that the state has one set of academic content standards for
Establish guidelines for determining	- Document 5.1.2b Participation in the Alternate	all students, and it appears that the assessment is based on
whether to assess a student with an	Assessment Decision Making (Training for IEP team	an alternate achievement standard.
AA-AAAS, including:	leaders and teachers)	
 A State definition of "students 		These documents also are unclear as to what standards are
with the most significant	- Document 5.1.2c State Guidelines & Participation	being used, common core or Delaware specific standards.
cognitive disabilities" that	Criteria Overview-January 2019 (all slides)	This leads to misunderstandings about what is actually
addresses factors related to		being assessed.
cognitive functioning and	- Document 2.3.1b Presentation to Governor's	
adaptive behavior;	Advisor Council for Exceptional Citizens (GACEC)	There appears to be mixed messaging about content vs.
Provide information for IEP Teams to	Oct 13, 2018	achievement standards and if discussing achievement
inform decisions about student		standards, which ones are being discussed (general or
assessments that:		extended?

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
 Provides a clear explanation of the differences between assessments aligned with grade- level academic achievement standards and those aligned 	- 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	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.
with alternate academic achievement standards, including any effects of State and local policies on a student's education resulting from taking	- 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	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.
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;	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)	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.
 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 		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.
to complete the requirements for a regular high school diploma; and Promote, consistent with requirements under the IDEA, the involvement and progress of students		Descriptions of the importance of communicating the distinctions between different assessments to parents is presented 5.1.2.b and 5.1.2.c.
with the most significant cognitive disabilities in the general education curriculum that is based on the State's academic content standards		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
	anyogtad by the mean new expense does not measure it well at the fine	students that switch between Alt and GenEd assessments.

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
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		Ample evidence is included in the State and DLM documentation about implementing accessibility features as well as available and needed supports/accommodations.
 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		

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.

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)

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

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	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.	- 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, 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 postadministration requirements. □ Appendix D-6, (p.102), for suggested Spanish test Reader Script □ Appendix F - Alternate Assessment Forms	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 noncollege 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.

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	Appendix F-2 is the ACCESS-Alt Participation Guidelines (p.127) Appendix F-3 is the ACCESS-Alt Participation Criteria Decision Tree (p.128)	
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	Comments/Notes/Questions/Suggestions Regarding
	reference)	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	- Document 5.1.1b DeSSA-Alt Website - Document 5.1.2b Participation in the Alternate Assessment Decision Making	State Documentation or Evidence 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.

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
students with disabilities or ELs the opportunity to participate in the assessment and any benefits from participation in the assessment.'		
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	Comments/Notes/Questions/Suggestions Regarding
	reference)	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	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	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.	- 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	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
For academic achievement standards:	The state defers to DLM	2.3.2d is used to document the alternate academic achievement standards are designated in the IEP.
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.	See Critical Elements 1.1, 1.2, and 6.1	State deferred to DLM for this CE.
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		

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
postsecondary education or competitive		
integrated employment.		
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	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
The State reports its assessment results for all students assessed, and the reporting facilitates timely, appropriate, credible,	- Document 1.3.1 DE Administrative Code_Title 14_Education , Section 155 (p.22)	Partially deferred to DLM. 6.4.1 reports participation rates and the percentages of
and defensible interpretations and uses of those results by parents, educators, State officials, policymakers and other	- Document 6.4.1 DeSSA Executive State Summary 2018 (pp.50-61) - Document 6.4.2 Assessment Reporting. DLM ALT	students at various proficiency levels across grades and content areas. This information is not disaggregated by group (ethnic groups, gender, SES, etc).
stakeholders, and the public.	- Document 6.4.3 DSARA Users guide v2.0 (DDOE	6.4.4 provides a breakdown of the ethnicities of students taking alternate assessments by content area, but not the
The State reports to the public its assessment results on student academic	and District Data Access overview)	performance of these groups of students.
achievement for all students and each student group at each achievement level ²	- Document 6.4.4 DeSSA-Alt Participation Data_Spring 2018 shows all students disaggregated by group and state assessment types.	6.4.2 provides examples and interpretive information for individualized reports. Subdomains are reported within each content area, addressing specific academic needs.
For <u>academic content assessments</u> , 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	- 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	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
 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 	- Document 1.3.4 DE Parent Brochure. final (2017-18)	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.
interpretive, descriptive, and diagnostic reports after each administration of its academic content assessments that:		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

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.

Critical Element		Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	B '1 1'1 1 1'11	reference)	State Documentation or Evidence
0	Provide valid and reliable		standards and levels. The information is understandable
	information regarding a		and uniform.
	student's academic		
	achievement;		It is unclear from the provided information how a parent
0	Report the student's academic		who does not speak English or Spanish would access the
	achievement in terms of the		material, how a parent with a disability would request
	State's grade-level academic		information in an alternate format, or what the timeline for
	achievement standards;		reporting is.
0	Provide information to help		
	parents, teachers, and principals		Question about 6.4.3: What is DCAS-Alt-1? How is this
	interpret the test results and		related to DLM assessments? DLM is not included in this
	address the specific <u>academic</u>		document about reporting.
	needs of students;		
0	Are provided in an		Although the state deferred to DLM, peers did not locate
	understandable and uniform		evidence describing timeliness of reports to parents and
	format;		teachers or aggregate reports that provide diagnostic
0	Are, to the extent practicable,		information for ongoing educational decision making.
	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;		
0	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.		
	ne State follows a process and		
	neline for delivering individual		
	udent reports to parents, teachers,		
	d principals as soon as practicable		
af	ter each test administration.		

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding	
Citical Element	reference)	State Documentation or Evidence	
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
TI C 1	N/A	N/A
The State has established technical	17/1	11/11
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		
The State has an eadynes in place to		
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		

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
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 no [list additional evidence needed water	•	

Element 7.2 -State Monitoring of Districts Regarding the Use of Locally Selected, Nationally Recognized High School

Academic Assessments Evidence (Record document and page # for future Comments/Notes/Questions/Suggestions Regarding Critical Element **State Documentation or Evidence** reference) N/A N/A 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. **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]

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence

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
	N/A	N/A
Γhe locally selected, nationally recognized high	IVA	IVA
chool 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;		
o 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.		

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
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] 		