



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

April 28, 2020

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

Dear Superintendent Kishimoto:

Thank you for submitting Hawaii's application for the Innovative Assessment Demonstration Authority (IADA) and the application addendum on April 20, 2020. The IADA is authorized in section 1204 of the Elementary and Secondary Education Act of 1965 (ESEA). It is designed to provide an opportunity for a State to pilot an innovative summative assessment in place of the State's existing assessment in a small number of schools, and to use the results in the State's accountability system, while scaling the innovative assessment over a number of years to eventually become the statewide assessment. I appreciate the work of you and your team to develop this IADA proposal.

As you know, the U.S. Department of Education (the Department) reviewed the Hawaii Department of Education's (HIDOE's) IADA application, including a review conducted by a panel of external peers. These reviews were based upon the requirements in ESEA section 1204 and the selection criteria described in 34 CFR §§ 200.105 and 200.106. The purpose of these reviews was to inform the Department regarding whether the proposed system provides comparable results to the State assessments that are valid, reliable, of high technical quality, consistent with relevant, nationally recognized professional and technical standards, and provide unbiased, rational, and consistent determinations of progress toward meeting the ambitious, State-designed long-term goals for academic achievement.

Based on the peer feedback and our own analysis of the application and application addendum, I find that the State's IADA application does not meet all statutory and regulatory requirements, as detailed in the enclosed table. Therefore, I am declining to approve HIDOE to implement its IADA proposal.

Under section 1204(e)(2)(F)(5) and (6) the State has an opportunity to revise and resubmit the IADA application within 60 days of the date of this letter and may submit additional evidence that the State's IADA application meets the requirements of the statute and regulations. A revised application should specifically address the requirements listed in the attached table.

Please contact my staff at oease.assessment@ed.gov if you have additional questions regarding your IADA application or any of the feedback provided in the attached table. Thank you for the

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

important work that you and your staff are doing to support the innovation that is possible through the ESSA. The Department looks forward to working with you to ensure that all children have the opportunity to reach their full potential.

Sincerely,

/s/

Frank T. Brogan
Assistant Secretary for
Elementary and Secondary Education

Enclosure

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

Items that Require Additional Information or Revision in Hawaii’s Innovative Assessment Demonstration Authority Plan

Regulatory Requirement	Required information from the SEA
<p>(b) Innovative assessment system. A demonstration that the innovative assessment system does or will--</p> <p>(1) Meet the requirements of section 1111(b)(2)(B) of the Act, except that an innovative assessment--</p> <p>(i) Need not be the same assessment administered to all public elementary and secondary school students in the State during the demonstration authority period described in 34 CFR 200.104(b)(2) or extension period described in 34 CFR 200.108 and prior to statewide use consistent with 34 CFR 200.107, if the innovative assessment system will be administered initially to all students in participating schools within a participating LEA, provided that the statewide academic assessments under 34 CFR 200.2(a)(1) and section 1111(b)(2) of the Act are administered to all students in any non-participating LEA or any non-participating school within a participating LEA; and</p> <p>(ii) Need not be administered annually in each of grades 3-8 and at least once in grades 9-12 in the case of reading/language arts and mathematics assessments, and at least once in grades 3-5, 6-9, and 10-12 in the case of science assessments, so long as the statewide academic assessments under 34 CFR 200.2(a)(1) and section 1111(b)(2) of the Act are administered in any required grade and subject under 34 CFR 200.5(a)(1) in which the SEA does not choose to implement an innovative assessment.</p>	<ul style="list-style-type: none"> • Evidence requested in sections (b)(2) and (b)(7) through (b)(9) below.
<p>(2)(i) Align with the challenging State academic content standards under section 1111(b)(1) of the Act, including the depth and breadth of such standards, for the grade in which a student is enrolled; and</p> <p>(ii) May measure a student’s academic proficiency and growth using items above or below the student’s grade level so long as, for purposes of meeting the requirements for reporting and school accountability under sections 1111(c) and 1111(h) of the Act and paragraphs (b)(3)</p>	<ul style="list-style-type: none"> • Evidence that the proposed innovative assessment used for accountability purposes (the shortened summative assessment) is sufficiently aligned to the full depth of the State’s academic content standards, specifically: <ul style="list-style-type: none"> ○ A demonstration that the proposed innovative test blueprint proposed for accountability determinations assesses the same depth of the academic content standards

Regulatory Requirement	Required information from the SEA
<p>and (b)(7)-(9) of this section, the State measures each student’s academic proficiency based on the challenging State academic standards for the grade in which the student is enrolled;</p>	<p>as the statewide assessment, especially given the proposed differences in item types (e.g., no constructed response items) when compared to the statewide assessment.</p>
<p>7) Generate an annual summative determination of achievement, using the annual data from the innovative assessment, for each student in a participating school in the demonstration authority that describes-- (i) The student’s mastery of the challenging State academic standards under section 1111(b)(1) of the Act for the grade in which the student is enrolled; or (ii) In the case of a student with the most significant cognitive disabilities assessed with an alternate assessment aligned with alternate academic achievement standards under section 1111(b)(1)(E) of the Act, the student’s mastery of those standards</p>	<ul style="list-style-type: none"> • Evidence that the shortened pilot assessment will sufficiently describe the student’s mastery of the State’s challenging academic standards, given that the innovative assessment is substantially different in length than the current statewide assessment, and does not contain constructed response items. Evidence provided to address requirement (b)(2) above may also address the concern for this critical element.
<p>(8) Provide disaggregated results by each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act, including timely data for teachers, principals and other school leaders, students, and parents consistent with 34 CFR 200.8 and section 1111(b)(2)(B)(x) and (xii) and section 1111(h) of the Act, and provide results to parents in a manner consistent with paragraph (b)(4)(i) of this section and part 200.2(e);</p>	<ul style="list-style-type: none"> • Evidence that the pilot assessments will provide disaggregated results by each subgroup of students, including timely data for teachers, principals and other school leaders, students, and parents, given that local assessment results will be reported in conjunction with State assessment results on parent reports (e.g., provide a rationale for reporting results of State assessments on the same document as local assessment results that are not standardized). • Evidence that the local assessment component of the innovative pilot are ready to be implemented and combined with the short summative component in the 2020-21 school year to calculate the overall summative score and to be included as part of the accountability system for participating schools.
<p>(9) Provide an unbiased, rational, and consistent determination of progress toward the State’s long-term goals for academic achievement under section 1111(c)(4)(A) of the Act for all students and each subgroup of students described in section 1111(c)(2) of the Act and a</p>	<ul style="list-style-type: none"> • Evidence requested in section (b)(7) above is also needed to satisfy this requirement.

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<p>comparable measure of student performance on the Academic Achievement indicator under section 1111(c)(4)(B) of the Act for participating schools relative to non-participating schools so that the SEA may validly and reliably aggregate data from the system for purposes of meeting requirements for--</p> <p>(i) Accountability under sections 1003 and 1111(c) and (d) of the Act, including how the SEA will identify participating and non-participating schools in a consistent manner for comprehensive and targeted support and improvement under section 1111(c)(4)(D) of the Act; and</p> <p>(ii) Reporting on State and LEA report cards under section 1111(h) of the Act.</p>	

Application Selection Criteria	Required information from the SEA
<p>(a)(3) If the system will initially be administered in a subset of schools or LEAs in a State--</p> <p>(i) The strategies the SEA, including each SEA in a consortium, will use to scale the innovative assessment to all schools statewide, with a rationale for selecting those strategies;</p> <p>(ii) The strength of the SEA’s or consortium’s criteria that will be used to determine LEAs and schools that will initially participate and when to approve additional LEAs and schools, if applicable, to participate during the requested demonstration authority period; and</p> <p>(iii) The SEA’s plan, including each SEA in a consortium, for how it will ensure that, during the demonstration authority period, the inclusion of additional LEAs and schools continues to reflect high-quality and consistent implementation across demographically diverse LEAs and schools, or contributes to progress toward achieving such implementation across demographically diverse LEAs and schools, including diversity based on enrollment of subgroups of students described in section 1111(c)(2) of the Act and student achievement.</p>	<ul style="list-style-type: none"> • Evidence that the State has a plan that includes annual benchmarks toward achieving high-quality and consistent implementation across participating schools that are, as a group, demographically similar to the State as a whole during the demonstration authority period, using the demographics of initially participating schools as a baseline (e.g., how is school or regional leadership engaged in identifying schools to participate in the innovative pilot assessment).

Application Selection Criteria	Required information from the SEA
<p>The plan must also include annual benchmarks toward achieving high-quality and consistent implementation across participating schools that are, as a group, demographically similar to the State as a whole during the demonstration authority period, using the demographics of initially participating schools as a baseline.</p>	
<p>(b)(2) The extent and depth of SEA, including each SEA in a consortium, and LEA capacity to implement the innovative assessment system considering the availability of technological infrastructure; State and local laws; dedicated and sufficient staff, expertise, and resources; and other relevant factors. An SEA or consortium may also describe how it plans to enhance its capacity by collaborating with external partners that will be participating in or supporting its demonstration authority. In evaluating the extent and depth of capacity, the Secretary considers--</p> <p>(i) The SEA’s analysis of how capacity influenced the success of prior efforts to develop and implement innovative assessments or innovative assessment items; and</p> <p>(ii) The strategies the SEA is using, or will use, to mitigate risks, including those identified in its analysis, and support successful implementation of the innovative assessment.</p>	<ul style="list-style-type: none"> • Evidence of the strategies HIDOE is using, or will use, to mitigate risks and support successful implementation of the local assessment component of the innovative assessment.
<p>(d)(2) The strategies the SEA or consortium has developed and will use to familiarize students and parents with the innovative assessment system;</p>	<ul style="list-style-type: none"> • Evidence that there are plans to make various materials accessible to all parents, specifically for: <ul style="list-style-type: none"> ○ Those parents without Internet access. ○ Parents who have limited English proficiency. ○ Parents with a disability as defined by the Americans with Disabilities Act (ADA).
<p>(d)(4) If the system includes assessment items that are locally developed or locally scored, the strategies and safeguards (e.g., test blueprints, item and task specifications, rubrics, scoring tools, documentation of quality control procedures, inter-rater reliability checks, audit plans) the SEA or consortium has developed, or plans to develop, to validly and reliably score such items, including how the</p>	<ul style="list-style-type: none"> • Evidence of a detailed description of the strategies and safeguards (e.g., test blueprints, item and task specifications, rubrics, scoring tools, documentation of quality control procedures, inter-rater reliability checks, audit plans) HIDOE has developed, or plans to develop, in order to validly and reliably score local assessment items.

Application Selection Criteria	Required information from the SEA
<p>strategies engage and support teachers and other staff in designing, developing, implementing, and validly and reliably scoring high-quality assessments; how the safeguards are sufficient to ensure unbiased, objective scoring of assessment items; and how the SEA will use effective professional development to aid in these efforts.</p>	
<p>(e)(1) The strength of the proposed evaluation of the innovative assessment system included in the application, including whether the evaluation will be conducted by an independent, experienced third party, and the likelihood that the evaluation will sufficiently determine the system’s validity, reliability, and comparability to the statewide assessment system consistent with the requirements of 34 CFR part200.105(b)(4) and (9);</p>	<ul style="list-style-type: none"> • Evidence that the proposed third-party evaluation will address the innovative assessment system’s validity and reliability, specifically plans to independently verify alignment of the two assessments (the short summative State test and the local assessments) with the State’s academic content standards. • Evidence of plans to address the comparability and alignment between the short Statewide summative assessment and the local assessments.