



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Michael F. Rice
State Superintendent
Michigan Department of Education
608 W. Allegan Street
P.O. Box 30008
Lansing, MI 48909

December 30, 2019

Dear Superintendent Rice:

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 Michigan Department of Education (MDE) to prepare for the peer review, which occurred in February 2019. Specifically, MDE submitted evidence regarding the SAT, its general high school assessment in reading/language arts and mathematics.

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

- Reading/language arts and mathematics general assessments in high school (SAT): **Substantially meets requirements of the ESEA, as amended by the NCLB and ESSA.**

Substantially meets requirements means that these components meet most of the requirements of the statute and regulations but some additional information is required. However, while your State met more of the requirements related to State administration of the SAT, as compared to the initial 2018 peer review, *significant* concerns related to test design and alignment with the State's academic content 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

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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 MDE has not yet met all of the ESEA requirements, the State will continue to have a condition on the Title I, Part A grant award related to those components of the assessment system. To satisfy this condition, MDE 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 MDE to submit is enclosed with this letter. Within 30 days of receipt of this letter, MDE must provide to the Department a plan and timeline by which it will submit the additional documentation. If adequate progress is not made in providing this information, the Department may take additional action.

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

Thank you for your ongoing commitment to improving educational outcomes for all students. I look forward to our continued partnership as we move ahead with this critical work. I appreciate the work you are doing to improve your schools and provide a high-quality education for your students.

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

Sincerely,

/s/
Frank T. Brogan
Assistant Secretary for
Elementary and Secondary Education

Enclosures

cc: Andrew Middlestead, Director, Office Educational Assessment and Accountability

Critical Elements Where Additional Evidence is Needed to Meet the Requirements for Michigan’s Use of the SAT

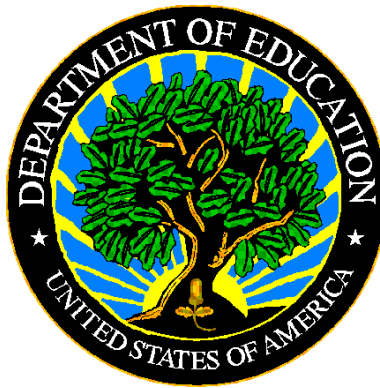
Critical Element	Evidence Needed
2.1 – Test Design and Development	For the SAT: <ul style="list-style-type: none"> • Evidence that the State’s test design and test development process is well-suited for the content, is technically sound, aligns the assessments to the depth and breadth of the State’s 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).
2.2 – Item Development	For the SAT: <ul style="list-style-type: none"> • 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.
3.1 – Overall Validity, including Validity Based on Content	For the SAT: <ul style="list-style-type: none"> • Evidence in 2.1 will satisfy this critical element.
3.2 – Validity Based on Cognitive Processes	For the SAT: <ul style="list-style-type: none"> • Validity evidence that its assessments tap the intended cognitive processes appropriate for high school as represented in the State’s academic content standards.
3.3 – Validity Based on Internal Structure	For the SAT: <ul style="list-style-type: none"> • 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.
5.1 – Procedures for Including Students with Disabilities	For the SAT: <ul style="list-style-type: none"> • Evidence that 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, specifically evidence that students who participate in the general assessment with allowable accommodations receive the same scores as those students who participate in the assessment without accommodations.
5.2 – Procedures for Including English Learners	For the SAT: <ul style="list-style-type: none"> • Evidence that 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. Specifically, evidence that ELs who participate in the general assessment with allowable accommodations receive the same scores as those students who participate in the assessment without accommodations.
5.3 –Accommodations	For the SAT: <ul style="list-style-type: none"> • 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

Critical Element	Evidence Needed
	<p>students who need and receive accommodations and students who do not need and do not receive accommodations.</p> <ul style="list-style-type: none"> • Evidence that accommodations do not deny students with disabilities or ELs the opportunity to participate in the assessment and any benefits from participation in the assessment (evidence requested in critical elements 5.1 and 5.2 would also address this request).
<p>6.3 – Challenging and Aligned Academic Achievement Standards</p>	<p>For the SAT:</p> <ul style="list-style-type: none"> • 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.
<p>6.4 – Reporting</p>	<p>For the SAT:</p> <ul style="list-style-type: none"> ▪ Evidence of 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.

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

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STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

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
<p><u>For academic content standards:</u> 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.</p>	<p>No additional evidence required per August 2018 letter to CSDE for SAT</p>	
<p>Section 1.1 Summary Statement</p>		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

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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
<p><u>For academic content standards:</u> 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.</p>	<p>No additional evidence required per August 2018 letter to CSDE for SAT</p>	
<p>Section 1.2 Summary Statement</p>		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

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Critical Element 1.3 – Required Assessments

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State’s assessment system includes annual general and alternate assessments aligned with <u>grade-level academic achievement standards</u> or alternate academic achievement standards in:</p> <ul style="list-style-type: none"> • 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). <p>AND</p> <p>The State’s <u>academic content assessments</u> must be the same assessments administered to all students in the tested grades, with the following exceptions:</p> <ul style="list-style-type: none"> • 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 	<p>No additional evidence required per August 2018 letter to CSDE for SAT</p>	

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<p>eighth grade and allow the student to take the State end-of-course mathematics test instead.</p> <ul style="list-style-type: none"> 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. 		
<p>Section 1.3 Summary Statement</p>		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> [list additional evidence needed w/brief rationale] 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

Critical Element 1.4 – Policies for Including All Students in Assessments

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>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.</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> ○ Policies state that all ELs must be included in all aspects of the content assessment system, unless the State has chosen the statutory option for recently arrived ELs under which such ELs are exempt from one administration of its reading/ language arts assessment. ○ If a State has developed native language assessments for ELs in R/LA, ELs must be assessed in R/LA in English if they have been enrolled in U.S. schools for three or more consecutive years, except, if a district determines, on a case-by-case basis, that native language assessments would yield more accurate and reliable information, the district may assess a student with native language assessments for a 	<p>No additional evidence required per August 2018 letter to CSDE for SAT</p>	

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

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<p>period not to exceed two additional consecutive years.</p> <ul style="list-style-type: none"> ○ 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. 		
<p>Section 1.4 Summary Statement</p> <p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

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

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

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>If the State has developed or amended challenging academic standards and assessments, the State has conducted meaningful and timely consultation with:</p> <ul style="list-style-type: none"> • 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. 	<p>State-specific; not applicable.</p>	
<p>Section 1.5 Summary Statement</p>		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

SECTION 2: ASSESSMENT SYSTEM OPERATIONS

Critical Element 2.1 – Test Design and Development

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State’s test design and test development process is well-suited for the content, is technically sound, aligns the assessments to <u>the depth and breadth of the State’s academic content standards</u> for the grade that is being assessed and includes:</p> <ul style="list-style-type: none"> • 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 <u>the State’s grade-level academic content standards</u> 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 <u>the State’s academic content standards</u>, reflects appropriate inclusion of challenging content, and requires complex demonstrations or applications of knowledge and skills (i.e., higher-order thinking skills). • If the State administers computer-adaptive assessments, the item pool and item selection procedures adequately support the test design and intended uses and interpretations of results. 	<p>Evidence Document: 2.1.a SAT User Group Geometry Review Discussion of math, specifically geometry, alignment took place at a meeting of state partners and College Board. The analysis resulting from this discussion is included to show the ongoing work to ensure the SAT is well aligned with state standards and classroom expectations. SAT state partners have conducted independent alignment studies with UConn, HumRRO, and WebbAlign using SAT test forms and item data as a resource. We are submitting some examples of these documents to be clear that states using the SAT are not relying on vendor produced alignment reports to support future submissions by state’s using SAT. Evidence Documents: 2.1.b Connecticut SAT Alignment Report Final June 2016 2.1.c SAT Alignment Final Report_DE 2.1.d SAT Alignment Final Report_Maine 2.1.e WV DRAFT alignment report 12_06_2018 Evidence Document: 2.1.f SAT Assessment Reporting Question Analysis screenshot referenced in the notes section. Score reporting resources allow teachers and students to see the content and state specific standards alignment of each item as part of the reporting process</p>	<p>Additional evidence requested for the SAT: A plan and a timeline to address the alignment issues identified in the existing alignment studies, particularly in mathematics.</p> <p>2.1.a SAT User Group Geometry Review After a February 27, 2019 meeting with States, College Board wrote a response indicating how the geometry content is selected for the SAT. Delaware, Michigan, Connecticut, New Hampshire, Maine, Illinois, Rhode Island “agreed that the alignment of the SAT Math Test to state standards is satisfactory and adequately meets their assessment needs” to which College Board provided a summary of the alignment study results, a summary of how the SAT assesses state high school mathematics standards, and a rationale for why the alignment is sufficient. The rationale stated “there are questions derived from the CCSS high school geometry standards that will align to other SAT Math Test domains. Therefore, students who take the SAT Math Test may be exposed to questions that are aligned to the six CCSS conceptual categories under high school geometry.” The text is intended to provide evidence that the geometry content assessed on the SAT Math Test requires a deep understanding of existing high school geometry standards and is therefore assessing an acceptable breadth of the geometry state standards.</p> <p>Page 2 states the independent alignment studies had different results. Even though the results confirm weak alignment to geometry and functions, SAT describes some of the noted gaps as “intended” (p. 3), which makes it sound as though the SAT has not changed the content but has studied it and defends the quality of the geometry items that may be presented to students. SAT does not forecast changing the content to better align to the CCSS.</p>

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

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<ul style="list-style-type: none"> • 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. 		<p>2.1.b Connecticut SAT Alignment Report Final June 2016</p> <p>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.</p> <p>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.</p> <p>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.</p> <ul style="list-style-type: none"> • Noted alignment gaps: Geometry – CO and Functions • Discussion indicates modest alignment for math. • Demographic information not supplied for panelists. <p>2.1.c SAT Alignment Final Report_DE</p> <p>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.</p>
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STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

		<p>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.</p> <p>The Special Study using the CCSSO Criteria evaluated whether the SAT (only one form) aligned to the content standards.</p> <p>Alignment results indicate poor rigor alignment between the CCSS and the SAT.</p> <p>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.</p> <p>This report also directs Maine to satisfy gaps in how the SAT measure the content standards using supplementary assessments in the state.</p> <p>2.1.e WV DRAFT alignment report 12_06_2018 It is of interest to note that Reviewers comments were redacted.</p> <ul style="list-style-type: none"> • 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.
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		<ul style="list-style-type: none"> • Table 13 indicates that MOST of the items on the math forms required major adjustments to achieve sufficient alignment to the standards. • Tables 14 and 15 indicates that Geometry and higher concepts in Algebra did not align.
		<p>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.</p>
<p>Section 2.1 Summary Statement</p>		
<p><u> </u>X_ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • A plan and a timeline to address the alignment issues as identified in the existing alignment studies. 		

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STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

Critical Element 2.2 – Item Development

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State uses reasonable and technically sound procedures to develop and select items to:</p> <ul style="list-style-type: none"> Assess student achievement based on the State’s academic content standards in terms of content and cognitive process, including higher-order thinking skills. 	<p>The following reviewer guides provide the relevant evidence for item development and selection as requested.</p> <p>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>	<p>Additional evidence requested for the SAT:</p> <p>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.</p> <p>2.2.a – 2.2.e provide detailed information about test development and review, including item development and test assembly.</p> <p>2.2.c SAT Suite Test Development Guide for the Reading Test, pp. 26-37 p. 89 – item review criteria - 2.2.d SAT Suite Test Development Guide for the Writing and Language Test, pp. 31-40</p> <p>Evidence submitted in this section did not indicate that the items were created based on any state’s academic content standards.</p> <p>The evidence did not directly address cognitive processes; however, text complexity is addressed in the test development guides for ELA tests.</p> <p>3.2.a Overview of SAT Cognitive Lab Report The College Board partnered with HumRRO to conduct a Cognitive Lab Study of the SAT due September 2019 which may provide information on the cognitive process, including higher order thinking skills. This report should be submitted for review.</p> <p>2.1.d SAT Alignment Final Report_Maine The HumRRO study submitted for section 2.1 pointed out some of the issues with DOK and reporting category alignment based on state standards.</p>

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

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		<p>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> <p>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?</p> <p>Evidence not submitted to meet this component of the critical element.</p> <p>Evidence of guidelines for item writers with respect to fairness in the development and review process.</p> <p>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</p> <p>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, ethnocentrism, regionalism, 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.</p>
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Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

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		4.2.a SAT Suite Universal Design Principles This document addresses development of items for fairness.
Section 2.2 Summary Statement		
<p><u> X </u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none">• Evidence of reasonable and technically sound procedures to develop and select items to assess student achievement based on the State's academic content standards in terms of content and cognitive process, including higher-order thinking skills.• Final HumRRO <u>SAT Cognitive Lab Report</u>.		

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

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Critical Element 2.3 – Test Administration

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State implements policies and procedures for standardized test administration; specifically, the State:</p> <ul style="list-style-type: none"> • 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. 	<p>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.</p> <p>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 evidence required. 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.</p> <p>Evidence Document: 2.3.b Online Test Day Training Script (page references are to the pages # in the pdf document) Pages 3-7 provide the instructions for planning accommodating testing Pages 22-24 cover how to read the non-standard scripts</p>	<p>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;</p> <p>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.</p> <p>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</p> <p>2.3.b Online Test Day Training Script p. 34 Test Coordinators must complete online training and attain a passing score of 80%.</p>

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

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	<p>included in the Accommodated Testing Manual including reinforcement of the policy to practice the scripts in advance of administration.</p> <p>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.</p> <p>Evidence Document: 2.3.d SAT School Day Coordinator Manual State-provided Pages 61-62 have an example of the staff agreement form that each educator responsible for materials and/or room proctor must sign. This allows College Board and state SAT users to have an auditable record that training was completed, and processes followed.</p>	<p>2.3.c CSDE-Test-Day-Training-2272019 p. 66 “All staff must participate in coordinator test training live or online . . .”</p> <p>Training presentation slides and script reiterate information about accommodations that are in the accommodations manual.</p> <p>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.</p> <p>States should submit verification that training was implemented as described in SAT documents.</p>
<p>Section 2.3 Summary Statement</p>		
<p><input checked="" type="checkbox"/> No additional evidence is required of SAT</p> <p><input checked="" type="checkbox"/> The following additional evidence is needed from States:</p> <ul style="list-style-type: none"> States must submit verification that training was implemented as described in SAT documents. 		

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

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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
<p>The State adequately monitors the administration of its State assessments to ensure that standardized test administration procedures are implemented with fidelity across districts and schools. Monitoring of test administration should be demonstrated for all assessments in the State system: the general academic assessments and the AA-AAAS.</p>	<p>State-specific; not applicable.</p>	
<p>Section 2.4 Summary Statement</p>		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

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Critical Element 2.5 – Test Security

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State has implemented and documented an appropriate set of policies and procedures to prevent test irregularities and ensure the integrity of test results through:</p> <ul style="list-style-type: none"> • 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. 	<p>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</p> <p>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.</p>	<p>Additional evidence requested for the SAT: Evidence of annual training requirements for test security policies and procedures for Connecticut educators for all assessments.</p> <p>2.3.b Online Test Day Training Script Page citations communicate clear security policies and procedures for administration of SAT.</p> <p>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.”</p> <p>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?</p> <p>The documentation offered by the SAT only requires test administrators, proctors, and monitors to agree they have received and read the manual.</p> <p>Only Connecticut provided evidence for this component of the critical element.</p>
<p>Section 2.5 Summary Statement</p>		
<p><input type="checkbox"/> <u>X</u> No additional evidence is required from SAT</p> <p><input type="checkbox"/> <u>X</u> The following additional evidence is needed from States</p> <ul style="list-style-type: none"> • Annual training requirements for test security policies and procedures was conveyed in each state to appropriate staff. 		

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

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

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Critical Element 2.6 – Systems for Protecting Data Integrity and Privacy

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State has policies and procedures in place to protect the integrity and confidentiality of its test materials, test-related data, and personally identifiable information, specifically:</p> <ul style="list-style-type: none"> • 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. 	<p>No additional evidence required per August 2018 letter to CSDE for SAT</p>	
<p>Section 2.6 Summary Statement</p>		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

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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
<p>The State has documented adequate overall validity evidence for its assessments consistent with nationally recognized professional and technical testing standards. The State’s validity evidence includes evidence that:</p> <p><u>The State’s academic assessments</u> measure the knowledge and skills specified in the State’s academic content standards, including:</p> <ul style="list-style-type: none"> • 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 	<p>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.</p> <p>Evidence Documents: 2.1.b Connecticut SAT Alignment Report Final June 2016 2.1.c SAT Alignment Final Report_DE 2.1.d SAT Alignment Final Report_Maine 2.1.e WV DRAFT alignment report 12_06_2018</p> <p>Evidence Document: 2.1.f SAT Assessment Reporting</p> <p>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</p>	<p>Additional evidence requested for the SAT: Evidence requested in Critical Element 2.1 will satisfy this Critical Element.</p> <p>Please refer to comments in 2.1</p> <p>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.</p>

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

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in test design to be appropriate for students with the most significant cognitive disabilities.		
Section 3.1 Summary Statement		
<input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale: <ul style="list-style-type: none">• A plan and a timeline to address the alignment issues as identified in the existing alignment studies.		

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

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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
<p>The State has documented adequate validity evidence that its assessments tap: <u>the intended cognitive processes</u> appropriate for each grade level as represented in the State’s academic content standards.</p>	<p>Evidence Document: 3.2.a Overview of SAT Cognitive Lab Report</p>	<p>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.</p> <p>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.</p>
<p>Section 3.2 Summary Statement</p>		
<p><u> </u>X_ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Validity evidence that its assessments tap the intended cognitive processes appropriate for high school as represented in the State's academic content standards. 		

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

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Critical Element 3.3 – Validity Based on Internal Structure

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State has documented adequate validity evidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State’s <u>academic content standards</u>.</p>	<p>Evidence Documents: 3.3.a SAT Suite Technical Manual Appendixes (October) Page 73 has a table with the section score characteristics Pages 139-141 (table A-6.9.1 through A-6.9.3) has the raw score correlations for Reading, Writing & Language, and Math on three operational forms of the SAT Pages 158-160 (table A-6.12.1 through A-6.12.3) has the scaled score correlations for Reading, Writing & Language, and Math on three operational forms of the SAT 3.3.b StudentScoreReport_Redacted This document shows how the section scores are reported to students & families in the most generic paper report from College Board. It describes the performance related to the SAT benchmarks; states provide supplemental reports for their own performance levels 3.3.c Delaware parent report Provided as an example of how one state provides the intended interpretations in the context of their state content standards and performance descriptors. 3.3.d skills insight sat suite Provided as evidence of how College Board presents the students performance in each test section in the context of academic skills. Educators have a map of these skills to specific state standards available to them, dynamically, through online score reporting tools.</p>	<p>Additional evidence requested for the SAT: Evidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State's academic content standards on which the intended interpretations and uses of results are based.</p> <p>2.1.c. SAT Alignment Final Report_DE p. 46. “However, reporting the subscores does not provide additional information, statistically, above and beyond the information offered through the total score used alone. Thus, caution should be used in placing too much emphasis on or over-interpreting what the subscores mean regarding strengths and weaknesses of a student. This cautionary message needs to be disseminated down to principals, teachers, and anyone who may use the subscores; the subscores may be misleading if used alone.”</p> <p>3.3.a SAT Suite Technical Manual Appendixes (October) Provides evidence that subscores are correlated with each other as expected (math subscores with each other, ELA subscores with each other).</p> <p>The HUMRRO study illuminated some of the issues with the subscores, particularly within the math section. Also, the underlying issues with these validity critical elements are aligned to and measure “state’s academic standards” which the assessment does not appear to be well aligned.</p> <p>3.3.b StudentScoreReport_Redacted SAT score report is based on the SAT framework. The comment provided in the index by SAT implies that the score reports published by the SAT are based on the SAT’s framework. This would imply that states are left</p>

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

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		<p>with the task of explaining what scores mean in terms of their state standards.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
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Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.

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		<p>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.</p>
Section 3.3 Summary Statement		
<p><u> X </u> The following additional evidence that</p> <ul style="list-style-type: none">• 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.		

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

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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		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

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SECTION 4: TECHNICAL QUALITY – OTHER

Critical Element 4.1 – Reliability

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State has documented adequate reliability evidence for its assessments for the following measures of reliability for the State’s student population overall and each student group consistent with nationally recognized professional and technical testing standards. If the State’s assessments are implemented in multiple States, measures of reliability for the assessment overall and each student group consistent with nationally recognized professional and technical testing standards, including:</p> <ul style="list-style-type: none"> • 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 academic achievement.</u> 	<p>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</p> <p>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</p>	<p>Additional evidence requested for the SAT: Reliability data for students with disabilities, English learners, and students who received accommodations.</p> <p>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?</p> <p>Evidence provided in the following reports is state specific; thus it cannot be evaluated overall.</p> <p>4.1.c 2016 Michigan SAT Subgroup Reliability Michigan (4.1.c) provided reliabilities by gender, race/ethnicity, ELs, and by accommodations.</p> <p>4.1.d 2018 Connecticut SAT Subgroup Reliability</p>

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

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Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		<p>Connecticut (4.1.d) provided reliabilities by gender, race/ethnicity, ELs, and SWDs, but not according to accommodations.</p> <p>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.</p> <p>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?</p>
Section 4.1 Summary Statement		
<p><input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> Evidence of adequate reliability for students with disabilities, English learners, and students who received accommodations. 		

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

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Critical Element 4.2 – Fairness and Accessibility

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p><i>For all State academic assessments,</i> assessments should be developed, to the extent practicable, using the principles of universal design for learning (UDL) (see definition¹).</p> <p>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.</p>	<p>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</p> <p>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)</p>	<p>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.</p> <p>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.</p> <p>4.1.c 2016 Michigan SAT Subgroup Reliability 4.1.d 2018 CT SAT Subgroup Reliability 4.1.e 2018 DE SAT Subgroup Reliability</p> <p>As noted above, this evidence reveals lower scores and lower reliabilities for particular subgroups. According to 4.7.b. the Delaware mean scores were up to a half of a SD higher for the general population than the means reported in the executive summary of 4.1.b for traditionally marginalized subgroups of students (Math 404, ELA 424), and many of these students are not completing sections of the test. The state reports indicate that reliabilities are higher for students who are white.</p> <p>No discussion of the reliability scores is provided.</p>

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

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

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		<p>Evidence that the State supports and enhances the accessibility of the assessments through appropriate accommodations for students with disabilities, and, to the extent practicable, by incorporating principles of universal design for learning (UDL) (section 11 11(b)(2)(B)(xiii) of the ESEA, as amended by the ESSA).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Evidence is needed that the states have considered the subgroup reliabilities and other score analyses in relation to fairness issues.</p>
<p>Section 4.2 Summary Statement</p>		
<p><u> X </u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Evidence is needed that the states have considered the subgroup reliabilities and other score analyses in relation to fairness issues. 		

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

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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		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

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Critical Element 4.4 – Scoring

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State has established and documented standardized scoring procedures and protocols for its assessments that are designed to produce reliable and meaningful results, facilitate valid score interpretations, and report assessment results in terms of the State’s <u>academic achievement standards</u>.</p>	<p>No additional evidence required per August 2018 letter to CSDE for SAT</p>	
<p>Section 4.4 Summary Statement</p>		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

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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
<p>If the State administers multiple forms of academic assessments within a content area and grade level, within or across school years, the State ensures that all forms adequately represent the State’s academic content standards and yield consistent score interpretations such that the forms are comparable within and across school years.</p>	<p>No additional evidence required per August 2018 letter to CSDE for SAT</p>	
<p>Section 4.5 Summary Statement</p>		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

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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
<p>If the State administers any of its assessments in multiple versions within a subject area (e.g., online versus paper-based delivery; <u>or a native language version of the academic content assessment</u>), grade level, or school year, the State:</p> <ul style="list-style-type: none"> • 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. 	<p>No additional evidence required per August 2018 letter to CSDE for SAT</p>	
<p>Section 4.6 Summary Statement</p>		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

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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
<p>The State:</p> <ul style="list-style-type: none"> 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. 	<p>Evidence Documents: 4.7.a Connecticut 2018 TA Report 4.7.b Delaware 2018 SAT Total Group TA Report 4.7.c CSDE Debrief Meeting Notes 051818_SAT</p>	<p>Additional evidence requested for the SAT: Evidence of a system for monitoring and maintaining, and improving as needed, the quality of its assessment system, including clear and technically sound criteria for the analyses of all of the assessments in its assessment system.</p> <p>4.7.a Connecticut 2018 TA Report 4.7.b Delaware 2018 SAT Total Group TA Report These reports do not indicate that these are used for monitoring, maintaining, and improving the quality of the assessment system.</p> <p>Documents provide states with appropriate data for judging the performance of their students and subgroups of students on the SAT, which is useful information for states to consider in selecting or developing their assessment systems.</p> <p>None of the evidence provided suggested how the SAT developers plan to maintain or improve the quality of the SAT. The sample reports detail information about the recent test administration, however, a process to improve or make changes, and technically sound criteria for analysis of the assessment are not included. This seems to meet monitoring component, but not maintaining and improving the assessment, e.g., retiring items or lifespan of a test form, revising blueprint, subgroup analyses, etc.</p> <p>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.</p>

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

Section 4.7 Summary Statement

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

- System for maintaining, and improving as needed, the quality of its assessment system, including clear and technically sound criteria for the analyses of all of the assessments in its assessment system.

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

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SECTION 5: INCLUSION OF ALL STUDENTS

Critical Element 5.1 – Procedures for Including Students with Disabilities

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State has in place procedures to ensure the inclusion of all public elementary and secondary school students with disabilities in the State’s assessment system. Decisions about how to assess students with disabilities must be made by a student’s IEP Team under IDEA, the placement team under Section 504, or the individual or team designated by a district to make that decision under Title II of the ADA, as applicable, based on each student’s individual abilities and needs.</p> <p>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:</p> <ul style="list-style-type: none"> • Establish guidelines for determining whether to assess a student with an AA-AAAS, including: <ul style="list-style-type: none"> ○ A State definition of “students with the most significant cognitive disabilities” that addresses factors related to cognitive functioning and adaptive behavior; • Provide information for IEP Teams to inform decisions about student assessments that: 	<p>Evidence Documents:</p> <p>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:</p> <p>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</p>	<p>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.</p> <p>Peers commend the College Board for increasing the number of accommodations for students with disabilities.</p> <p>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).”</p> <p>2.3.a SAT-School Day Accommodated Testing Manual State-Provided pp. 12-13 Lists of allowable accommodations</p> <p>p. 14 CB provides the procedure to follow to ensure that a student with an accommodation receives a reportable college score.</p> <p>p. 18 There is a process whereby states can request college-reportable scores for unique accommodations requested for a student. “State-allowed accommodations (SAAs) may be available depending on your state. If available, SAAs allow students to use defined accommodations or supports; however, they may not result in college- or scholarship-reportable scores.</p> <p>2.3.c CSDE-Test-Day-Training-2272019</p>

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<ul style="list-style-type: none"> ○ Provides a clear explanation of the differences between assessments aligned with grade-level academic achievement standards and those aligned with alternate academic achievement standards, including any effects of State and local policies on a student's education resulting from taking an AA-AAAS, such as how participation in such assessments may delay or otherwise affect the student from completing the requirements for a regular high school diploma; ● Ensure that parents of students assessed with an AA-AAAS are informed that their child's achievement will be measured based on alternate academic achievement standards; ● Not preclude a student with the most significant cognitive disabilities who takes an AA-AAAS from attempting to complete the requirements for a regular high school diploma; and ● Promote, consistent with requirements under the IDEA, the involvement and progress of students with the most significant cognitive disabilities in the general education curriculum that is based on the State's academic content standards for the grade in which the student is enrolled; and 		<p>p. 37 lists accommodations that are "Used for state accountability system and college admission." Evidence that students with disabilities are not denied the opportunity to participate in the assessment and any benefits from participation in the assessment.</p> <p>Since this is a CT document, it is not clear if this policy applies to all states in this consortium.</p> <p>It is recommended that States review the accommodation guidelines for college-reportable scores with IEP teams.</p>

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

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Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<ul style="list-style-type: none"> 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		
<p><input checked="" type="checkbox"/> The following additional evidence is needed from States</p> <ul style="list-style-type: none"> States follow procedures to request SAA be college-reportable. 		

² See the full regulation at 34 CFR § 200.6(d) (online at https://www.ecfr.gov/cgi-bin/text-idx?SID=07e168e9e7a6c5931b4549cc15547ee9&mc=true&node=se34.1.200_16&rgn=div8)

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

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

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>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:</p> <ul style="list-style-type: none"> • 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. 	<p>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</p>	<p>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.</p> <p>Peers commend the College Board for increasing the number of supports for English Learners.</p> <p>2.3.a SAT-School Day Accommodated Testing Manual State-Provided p. 8 “<i>Students using the 50% extended time EL support receive extended time on the entire assessment.</i>” p. 10 “Meet with your test coordinator to ensure you have plans in place for testing students with accommodations and EL supports.”</p> <p>pp. 12-14 Lists of allowable accommodations</p> <p>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.</p>

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

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Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		<ul style="list-style-type: none"> • They use the same supports in class or for other assessments. <p>2.3.c CSDE-Test-Day-Training-2272019. pp. 49, 52. EL students who use 50% extended time will receive a college reportable score.</p> <p>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.</p>
Section 5.2 Summary Statement		
<input checked="" type="checkbox"/> No additional evidence is required		

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

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Critical Element 5.3 – Accommodations

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

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

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Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>opportunity to participate in the assessment and any benefits from participation in the assessment.</p>		<p>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).</p>
<p>Section 5.3 Summary Statement</p>		
<p><u> X </u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • 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. 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

Critical Element 5.4 – Monitoring Test Administration for Special Populations

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State monitors test administration in its districts and schools to ensure that appropriate assessments, with or without accommodations, are selected for all students with disabilities and ELs so that they are appropriately included in assessments and receive accommodations that are:</p> <ul style="list-style-type: none"> • 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. 	<p>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.</p>	<p>Additional evidence requested for the SAT:</p> <p>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:</p> <ul style="list-style-type: none"> • Consistent with the State's policies for accommodations; <ul style="list-style-type: none"> 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; <ul style="list-style-type: none"> 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. <p>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.</p>

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		<p>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.</p> <p>No State Education Agency or CB monitoring documentation is provided for before, during, or post administration.</p> <p>States should provide evidence that all components of this requested evidence are included, e.g., in a monitoring protocol.</p>
Section 5.4 Summary Statement		
<p><input checked="" type="checkbox"/> No additional evidence is required from SAT</p> <p><input type="checkbox"/> 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:</p> <ul style="list-style-type: none"> • 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. 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

SECTION 6: ACADEMIC ACHIEVEMENT STANDARDS AND REPORTING

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

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p><u>For academic content standards:</u></p> <p>The State formally adopted <u>challenging academic achievement standards</u> in reading/language arts, mathematics, and science for all students, specifically:</p> <ul style="list-style-type: none"> • 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; <p>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.</p>	<p>No additional evidence required per August 2018 letter to CSDE for SAT</p>	
<p>Section 6.1 Summary Statement</p>		
<p>___ No additional evidence is required or</p>		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

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
<p>The State used a technically sound method and process that involved panelists with appropriate experience and expertise for setting:</p> <ul style="list-style-type: none"> • <u>Academic achievement standards and, as applicable, alternate academic achievement standards.</u> 	<p>No additional evidence required per August 2018 letter to CSDE for SAT</p>	
<p>Section 6.2 Summary Statement</p>		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

Critical Element 6.3 – Challenging and Aligned Academic Achievement Standards

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p><u>For academic achievement standards:</u></p> <p>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.</p> <p>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</p>	<p>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.</p> <p>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</p>	<p>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.</p> <p>6.3.a National SAT Validity Study 6.3.b SAT score relationships with CTE program performance</p> <p>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.</p> <p>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.</p> <p>Although the evidence confirms predictive validity of the</p>

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STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

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.		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		
<p><u> X </u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • 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. 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

Critical Element 6.4 – Reporting

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State reports its assessment results for all students assessed, and the reporting facilitates timely, appropriate, credible, and defensible interpretations and uses of those results by parents, educators, State officials, policymakers and other stakeholders, and the public.</p> <p>The State reports to the public its assessment results on <u>student academic achievement for all students and each student group at each achievement level</u>³</p> <p>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 <u>specific academic needs of students</u>, and the State also provides interpretive guides to support appropriate uses of the assessment results.</p> <ul style="list-style-type: none"> The State provides for the production and delivery of individual student interpretive, descriptive, and diagnostic reports after each administration of its academic content assessments that: 	<p>Individual score reports are delivered by College Board to every student tested within weeks of test administration.</p> <p>Evidence Documents: 6.4.a understanding sat scores 6.4.b understanding sat scores Spanish</p> <p>These documents describe the key elements of the online score reports. Students also have access to video tutorials and other help resources to be able to access and understand their results.</p> <p>5.4.a 2017_18 SAT State Accountability Layout This file provides the layout of the final score reporting file for a state’s SAT administration. It is delivered in June or early July to all state SAT users with one row per student identified as eligible/required to participate in the SAT administration.</p> <p>The SAT Data File Layout tab provides each element with values and comments; student name, school, and other key information (i.e., SSID in row 22) is reported back to the state’s assessment team in the exact format it was provided to identify the student for testing. This is especially important for timely turn-around of this report for state purposes.</p> <p>3.3.d skills insight sat suite Provided as evidence of how College Board presents the students performance in each test section in the context of academic skills. Every student gets this report as part of an individual score report. Educators have a map of these skills to specific state standards available to them, dynamically, through online score reporting tools.</p>	<p>Additional evidence requested for the SAT: Evidence of reporting that facilitates timely, appropriate, credible, and defensible interpretations and uses of results for students tested by parents, educators, State officials, policymakers and other stakeholders, and the public, including:</p> <p>1. The production and delivery of individual student interpretive, descriptive, and diagnostic reports after each administration of its assessments that:</p> <p>1.a. Report the student's achievement in terms of the State's grade-level academic achievement standards (including performance-level descriptors);</p> <p>3.3.c Delaware parent report Includes a sample report based on the state’s achievement levels and broad performance-level descriptors.</p> <p>6.4.a Understanding SAT Scores. “The SAT measures the skills and knowledge that research shows are the most important for success in college and career.” There is no mention of student achievement in terms of the State’s grade-level academic achievement standards.</p> <p>SAT Reports do not convey student achievement in terms of the state standards. Connections between students’ achievement of particular skills and the state standards are only directly available to teachers, who have access to a</p>

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.

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STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<ul style="list-style-type: none"> ○ Provide valid and reliable information regarding a <u>student’s academic achievement</u>; ○ Report the <u>student’s academic achievement</u> in terms of the State’s grade-level academic achievement standards; ○ Provide information to help parents, teachers, and principals interpret the test results and address the specific <u>academic needs of students</u>; ○ Are provided in an understandable and uniform format; ○ Are, to the extent practicable, written in a language that parents and guardians can understand or, if it is not practicable to provide written translations to a parent or guardian with limited English proficiency, are orally translated for such parent or guardian; ○ Upon request by a parent who is an individual with a disability as defined by the ADA, as amended, are provided in an alternative format accessible to that parent. ● The State follows a process and timeline for delivering individual student reports to parents, teachers, and principals as soon as practicable after each test administration. 		<p>mapping between the SAT framework and the state standards.</p> <p>That said, it appears that teachers have to do the work of interpreting each student’s score in terms of the standards. The evidence indicates that individual reports are interpretive and descriptive of students’ overall domain competence, according to the SAT framework. The evidence does not indicate that individual reports may be easily interpreted in terms of the state standards nor may they assist in diagnosing students’ particular strengths or weaknesses.</p> <p>Some state reports include four achievement levels with performance descriptors per domain as a reference for students and parents to interpret individual scores. However, such information is insufficient for identifying how to support student continued progress.</p> <p>3.3.d Skills Insight SAT Suite</p> <p>Provides lists of skills and concepts associated with each score range. These lists are not presented in terms of the state content standards. Furthermore, the lists represent typically the skills that a particular score indicates, not the skills a particular student has or lacks based on their item responses. This document does not refer to student’s achievement in terms of the State’s grade-level academic achievement standards.</p> <p>States must provide this evidence.</p>

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STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		<p>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</p> <p>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.</p> <p>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.</p> <p>There is no information on availability of alternate formats of the reports available upon request.</p> <p>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.</p> <p>2. A process and timeline for delivering individual student reports to parents, teachers, and principals as soon as practicable after each test administration</p> <p>5.4.a 2017_18 SAT State Accountability Layout This data file is provided to state SAT users in June or early July with one row per student identified as eligible/required to participate in the SAT administration.</p>

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		<p>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.</p> <p>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.</p> <p>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.</p> <p>Evidence of a process and timeline is needed from states that student reports are provided to teachers, principals and parents as soon as practicable.</p>
Section 6.4 Summary Statement		
<p><input type="checkbox"/> <u>X</u> No additional evidence is required of SAT</p> <p><input type="checkbox"/> <u>X</u> The following additional evidence is needed: States must provide</p> <ul style="list-style-type: none"> • 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. 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

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
<p>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.</p> <p>The State’s technical criteria include a determination that the assessment:</p> <ul style="list-style-type: none"> • Is aligned with the challenging State academic standards; and • Addresses the depth and breadth of those standards. <p>AND</p> <p>The State has procedures in place to ensure that a district that chooses to use a nationally recognized high school academic assessment administers the same assessment to all high school students in the district except for students with the most significant cognitive disabilities who may be assessed with an AA-AAAS.</p>	<p>N/A</p>	<p>N/A</p>

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>AND</p> <p>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—</p> <ul style="list-style-type: none"> • 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		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

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

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State must have procedures in place to ensure that:</p> <p>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—</p> <ul style="list-style-type: none"> • 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. 	<p>N/A</p>	<p>N/A</p>
<p>Section 7.2 Summary Statement</p>		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

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STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

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
<p>The locally selected, nationally recognized high school academic assessment:</p> <ul style="list-style-type: none"> • Is equivalent to or more rigorous than the statewide assessment, with respect to— <ul style="list-style-type: none"> ○ 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— <ul style="list-style-type: none"> ○ Are comparable to student academic achievement data for all high school students and each subgroup of high school students produced by the statewide assessment at each academic achievement level; ○ Are expressed in terms consistent with the State’s academic achievement standards; and ○ Provide unbiased, rational, and consistent differentiation among schools within the State for the purpose of the State determined accountability system including calculating the Academic Achievement indicator and annually meaningfully differentiating between schools. 	N/A	N/A

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

STATE ASSESSMENT PEER REVIEW NOTES FOR SAT Consortium Resubmission

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
Section 7.3 Summary Statement		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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.

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.

STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

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

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STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

SECTION 1: STATEWIDE SYSTEM OF STANDARDS AND ASSESSMENTS

Critical Element 1.4 – Policies for Including All Students in Assessments

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>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.</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> ○ Policies state that all ELs must be included in all aspects of the content assessment system, unless the State has chosen the statutory option for recently arrived ELs under which such ELs are exempt from one administration of its reading/ language arts assessment. ○ If a State has developed native language assessments for ELs in R/LA, ELs must be assessed in R/LA in English if they have been enrolled in U.S. schools for three or more consecutive years, except, if a district determines, on a case-by-case basis, that native language assessments 	<p>Evidence #1.4e: M-STEP Test Administration Manual (Spring 2019) Page 31 demonstrates an explicit statement: “Students with disabilities publicly placed in private schools as a means of receiving special education and related services are required to be included in the statewide assessment system.”</p> <p>Evidence #1.4f: MI-Access Functional Independence Test Administration Manual (Spring 2019) Page 14 demonstrates an explicit statement: “Students with disabilities publicly placed in private schools as a means of receiving special education and related services are required to be included in the statewide assessment system.”</p> <p>Evidence #1.4g: MI-Access Participation and Supported Independence Test Administration Manual (Spring 2019) Page 14 demonstrates an explicit statement: “Students with disabilities publicly placed in private schools as a means of receiving special education and related services are required to be included in the statewide assessment system.”</p>	<p>For all assessments:</p> <ul style="list-style-type: none"> • Evidence that students with disabilities publicly placed in private schools as a means of providing special education and related services are required to be included in the statewide assessment system (e.g., guidance provided to local educational agencies that states this requirement). <p>Michigan provided evidence of updated test administration manuals for M-STEP (which includes SAT) and other assessments, with explicit language stating that students with disabilities publicly placed in private schools as a means of providing special education and related services are required to be included in the statewide assessment system.</p>

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<p>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.</p> <ul style="list-style-type: none"> ○ 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. 		
<p>Section 1.4 Summary Statement</p>		
<ul style="list-style-type: none"> • <input checked="" type="checkbox"/> No additional evidence is required 		

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

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

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>If the State has developed or amended challenging academic standards and assessments, the State has conducted meaningful and timely consultation with:</p> <ul style="list-style-type: none"> • 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. 	<p>Reviewed by Department Staff Only</p>	<p>Michigan adopted its content standards in 2010; therefore, this critical element does not apply.</p>
<p>Section 1.5 Summary Statement</p>		
<p style="text-align: center;">x No additional evidence is required</p>		

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SECTION 2: ASSESSMENT SYSTEM OPERATIONS

Critical Element 2.1 – Test Design and Development

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State’s test design and test development process is well-suited for the content, is technically sound, aligns the assessments to <u>the depth and breadth of the State’s academic content standards</u> for the grade that is being assessed and includes:</p> <ul style="list-style-type: none"> • 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 <u>the State’s grade-level academic content standards</u> 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 <u>the State’s academic content standards</u>, 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 	<p>The College Board has indicated that they will address this issue collectively for all states in their final submission.</p> <p>Evidence #2.1b: SAT Alignment work February 2018.</p> <p><u>Evidence #2.1c Meeting Minutes - Alignment Meeting 20180207.docx</u></p> <p>Evidence #2.1: SAT – MI yearly review of new SAT form, February 6, 2019</p> <p><u>Evidence #4.7a Meeting Notes - July 2017 Planning Meeting</u></p>	<p>For the SAT:</p> <ul style="list-style-type: none"> • A plan and a timeline to address the alignment issues identified in the existing alignment studies for the SAT, particularly in mathematics. <p>This evidence was submitted by College Board for a different peer review panel. Notes from that panel indicate additional evidence is requested to meet this Critical Element.</p> <p>Evidence #2.1b: Items are listed but it is difficult to interpret what items are aligned to standards. There is no discussion as to what it is aligned to or who was part of the process for this work.</p> <p>MI indicates it conducts annual alignment checks. What about independent reviewers? An external alignment of the MI academic content standards is not provided.</p> <p>MI provided Evidence 2.1b: SAT Alignment February 2018 as part of its further evidence to address the depth and breadth of the State’s academic content standards for its state but the listing of the number of items for reading, writing and language, and math across standards does not provide sufficient information. An independent review may be a way to address the information requested.</p> <p>Evidence 2.1c: lists the agenda but the action items to move forward is not provided.</p> <p>MI says that College Board will be engaged in dialogue about standards coverage. When will this occur?</p>

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<p>and intended uses and interpretations of results.</p> <ul style="list-style-type: none"> • 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. 		<p>Evidence #4.7a <u>Meeting Notes - July 2017 Planning Meeting</u> does indicate future standard setting.</p> <p>There is no evidence presented of alignment for bullet point 3. Cognitive complexity does not seem to be considered in these documents. There is no plan or timeline to address alignment issues which includes math-specific focus on addressing alignment issues as requested.</p> <p>Suggested evidence could include external alignment study, including addressing cognitive complexity, demonstrating the breadth and depth of the standards are assessed.</p>
Section 2.1 Summary Statement		
<p><input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • A plan and a timeline to address the alignment issues identified in the existing alignment studies for the SAT, particularly in mathematics. 		

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

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Critical Element 2.2 – Item Development

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State uses reasonable and technically sound procedures to develop and select items to:</p> <ul style="list-style-type: none"> Assess student achievement based on the State’s academic content standards in terms of content and cognitive process, including higher-order thinking skills. 	<p>The College Board has indicated that they will address this issue collectively for all states in their final submission.</p>	<p>For the SAT:</p> <ul style="list-style-type: none"> 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. Evidence of guidelines for item writers with respect to fairness in the development and review process. <p>This evidence was submitted by College Board for a different peer review panel. Notes from that panel indicate additional evidence is requested to meet this Critical Element.</p> <p>From SAT Review</p> <ul style="list-style-type: none"> Evidence of reasonable and technically sound procedures to develop and select items to assess student achievement based on the State's academic content standards in terms of content and cognitive process, including higher-order thinking skills. Final HumRRO SAT Cognitive Lab Report. <p>The SAT review requests 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.</p>
<p>Section 2.2 Summary Statement</p>		
<p><u> X </u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> 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 example: The HumRRO Sat Cognitive Lab Report. 		

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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
<p>The State has documented adequate overall validity evidence for its assessments consistent with nationally recognized professional and technical testing standards. The State’s validity evidence includes evidence that:</p> <p><u>The State’s academic assessments</u> measure the knowledge and skills specified in the State’s academic content standards, including:</p> <ul style="list-style-type: none"> • 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 		<p>Evidence requested in critical element 2.1 will satisfy this critical element.</p> <p>See notes on CE 2.1.</p> <p>This evidence was submitted by College Board for a different peer review panel. Notes from that panel indicate additional evidence is requested to meet this Critical Element.</p> <p>SAT Review</p> <ul style="list-style-type: none"> • A plan and a timeline to address the alignment issues as identified in the existing alignment studies.

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students with the most significant cognitive disabilities.		
Section 3.1 Summary Statement		
<input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale: <ul style="list-style-type: none">• A plan and a timeline to address the alignment issues as identified in the existing alignment studies.		

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

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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
<p>The State has documented adequate validity evidence that its assessments tap: <u>the intended cognitive processes</u> appropriate for each grade level as represented in the State’s academic content standards.</p>	<p>The College Board has indicated that they will address this issue collectively for all states in their final submission.</p>	<p>Validity evidence that its assessments tap the intended cognitive processes appropriate for high school as represented in the State’s academic content standards.</p> <p>This evidence was submitted by College Board for a different peer review panel. Notes from that panel indicate additional evidence is requested to meet this Critical Element.</p> <p>It is possible that the final HumRRO SAT Cognitive Lab Report may address this area.</p> <p>From SAT Review</p> <ul style="list-style-type: none"> • Validity evidence that its assessments tap the intended cognitive processes appropriate for high school as represented in the State's academic content standards.
<p>Section 3.2 Summary Statement</p>		
<p><u> X </u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Validity evidence that its assessments tap the intended cognitive processes appropriate for high school as represented in the State's academic content standards. 		

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Critical Element 3.3 – Validity Based on Internal Structure

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State has documented adequate validity evidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State’s <u>academic content standards</u>.</p>	<p>The College Board has indicated that they will address this issue collectively for all states in their final submission.</p>	<p>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.</p> <p>This evidence was submitted by College Board for a different peer review panel. Notes from that panel indicate additional evidence is requested to meet this Critical Element.</p> <p>From SAT review</p> <ul style="list-style-type: none"> 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.
<p>Section 3.3 Summary Statement</p>		
<p><u>X</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> 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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SECTION 4: TECHNICAL QUALITY – OTHER

Critical Element 4.2 – Fairness and Accessibility

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p><i>For all State academic assessments,</i> assessments should be developed, to the extent practicable, using the principles of universal design for learning (UDL) (see definition⁴).</p> <p><u>For academic content assessments,</u> 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.</p>	<p>2.3d: Student Supports and Accommodations Table</p> <p>The College Board has indicated that they will address this issue collectively for all states in their final submission.</p>	<p>For the SAT:</p> <ul style="list-style-type: none"> • 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 English learners. • Evidence that the State supports and enhances the accessibility of the assessments through appropriate accommodations for students with disabilities, and, to the extent practicable, by incorporating principles of universal design for learning. <p>The evidence listed doesn't meet either requirement. What happens if the MDE finds that an accommodation does affect the test construct?</p> <p>From the SAT Review</p> <ul style="list-style-type: none"> • Evidence is needed that the states have considered the subgroup reliabilities and other score analyses in relation to fairness issues. • 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.
<p>Section 4.2 Summary Statement</p>		
<p><u> </u> <input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Evidence is needed that the states have considered the subgroup reliabilities and other score analyses in relation to fairness issues. 		

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

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SECTION 5: INCLUSION OF ALL STUDENTS

Critical Element 5.1 – Procedures for Including Students with Disabilities

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State has in place procedures to ensure the inclusion of all public elementary and secondary school students with disabilities in the State’s assessment system. Decisions about how to assess students with disabilities must be made by a student’s IEP Team under IDEA, the placement team under Section 504, or the individual or team designated by a district to make that decision under Title II of the ADA, as applicable, based on each student’s individual abilities and needs.</p> <p>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:</p> <ul style="list-style-type: none"> • Establish guidelines for determining whether to assess a student with an AA-AAAS, including: <ul style="list-style-type: none"> ○ A State definition of “students with the most significant cognitive disabilities” that addresses factors related to cognitive functioning and adaptive behavior; • Provide information for IEP Teams to inform decisions about student assessments that: 	<p>5.1c Michigan Accommodations Manual</p> <p>5.1d Assessment Selection Guidelines Training screenshot</p> <p>5.1e Assessment Selection Guidance Interactive Tool screenshot</p> <p>5.1f Selecting and Assigning Universal Tools Designated Supports and Accommodations</p> <p>5.1g Accessibility Webinar - HI Student</p> <p>5.1h Accessibility Webinar - VI Student</p> <p>5.1i Accessibility Webinar - EL Student</p> <p>5.1j Accessibility Webinar - Read Aloud TTS</p> <p>5.1k Supports and Accommodations FAQ</p> <p>5.1l Tool 4 Accessibility Supports in the Classroom</p> <p>5.1m Tool 5 After-test Accessibility Questions</p>	<p>For the SAT:</p> <ul style="list-style-type: none"> • Evidence of the State’s process for ensuring that students with disabilities are included in the SAT with clear guidelines for educators and parents about accommodations and the receipt of college-reportable scores. • Evidence that children with disabilities are not denied the opportunity to participate in the assessment and any benefits from participation in the assessment. <p>Document 5.1c provides no SAT-specific evidence. Document 5.1g doesn’t distinguish whether this accommodation results in college-reportable scores or not. No documents were provided that meet the requirement of providing clear guidelines to educators and parents about accommodations and the receipt of college-reportable scores.</p> <p>The State appears to have met the requirement of providing evidence that children with disabilities are not denied the opportunity to participate in the assessment, but given the lack of clarity on college-reportable vs. non-college-reportable accommodations, including a lack of guidelines for parents and students to explain these differences, the state has not met the second portion of this requirement (evidence that children with disabilities are not denied any benefits from participation in the assessment).</p> <p>MDE says there are six accommodations that do not result in a college reportable score. How many students receive these six accommodations? How many students received a non-reportable score? What documentation does MI have that parents and students were</p>

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Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<ul style="list-style-type: none"> ○ Provides a clear explanation of the differences between assessments aligned with grade-level academic achievement standards and those aligned with alternate academic achievement standards, including any effects of State and local policies on a student's education resulting from taking an AA-AAAS, such as how participation in such assessments may delay or otherwise affect the student from completing the requirements for a regular high school diploma; • Ensure that parents of students assessed with an AA-AAAS are informed that their child's achievement will be measured based on alternate academic achievement standards; • Not preclude a student with the most significant cognitive disabilities who takes an AA-AAAS from attempting to complete the requirements for a regular high school diploma; and • Promote, consistent with requirements under the IDEA, the involvement and progress of students with the most significant cognitive disabilities in the general education curriculum that is based on the State's academic content standards 		<p>fully informed of the consequences of receiving these accommodations, or what document did the State provide to school IEP teams that could be shared with parents and students?</p> <p>From SAT Review</p> <ul style="list-style-type: none"> • States follow procedures to request SAA be college-reportable. <p>It is recommended that States review the accommodation guidelines for college-reportable scores with IEP teams.</p> <p>Evidence 5.1l: Tool 4 Accessibility Supports in the Classroom provides teacher tool to help inform decision making on assessment accessibility supports based on instructional use.</p> <p>Evidence 5.1m: Tool 5 After-test Accessibility Questions provided student feedback after test. How is this used, what were the results?</p> <p>Peers commented on the use of the after-test questions for student feedback as an efficient and effective avenue to ensure that accommodations are available for students.</p>

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STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>for the grade in which the student is enrolled; and</p> <ul style="list-style-type: none"> • 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 		
Section 5.1 Summary Statement		
<p><u> X </u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Evidence of the State’s process for ensuring that students with disabilities are included in the SAT with clear guidelines for parents about accommodations and the receipt of college-reportable scores. 		

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)

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

STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

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

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>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:</p> <ul style="list-style-type: none"> • 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. 	<p>See response for Critical Element 5.1.</p> <p>See accommodations manual 5.1c</p>	<p>For the SAT:</p> <ul style="list-style-type: none"> • Evidence of communicating information to districts, schools, teachers, and parents, including, at a minimum: <ul style="list-style-type: none"> ○ Procedures for determining whether an English learner should be assessed with accommodation(s). ○ Guidance regarding selection of appropriate accommodations for English learners. • Evidence that English learners are not denied the opportunity to participate in the assessment and any benefits from participation in the assessment. <p>Evidence 5.1c Michigan Accommodations Manual Evidence 5.1F: Selecting and Assigning Universal Tools Designated Supports and Accommodations provides information for all MI assessments.</p> <p>Evidence 5.1i: Accessibility Webinar - EL Student outlines the accommodations and supports framework but defers selection and guidance to local teams. Evidence of procedures and guidance in the selection of appropriate accommodations for English learners is not provided.</p> <p>Evidence is provided that English learners are not denied the opportunity to participate in the assessment (5.1i) but do not see evidence that they are not denied benefits from participation, since there is no clarification on implications of non-college-reportable scores. In 5.1i, slide 13, indicates a state allowable non college reportable score is reading directions and questions in the student’s native language.</p>
<p>Section 5.2 Summary Statement</p>		
<p><u> X </u> The following additional evidence is needed/provide brief rational</p> <ol style="list-style-type: none"> a. Evidence of communicating information to districts, schools, teachers, and parents, including, at a minimum <ul style="list-style-type: none"> • Guidance regarding selection of appropriate accommodations for English learners and its implications on college reportable score. • Evidence that English learners are not denied benefits from participation in the assessment. 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

Critical Element 5.3 – Accommodations

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State makes available appropriate accommodations and ensures that its assessments are accessible to students with disabilities and ELs, including ELs with disabilities. Specifically, the State:</p> <ul style="list-style-type: none"> • Ensures that appropriate accommodations, such as, interoperability with, and ability to use, assistive technology, are available to measure the academic achievement of students with disabilities. • Ensures that appropriate accommodations are available for ELs; • Has determined that the accommodations it provides (1) are appropriate and effective for meeting the individual student’s need(s) to participate in the assessments, (2) do not alter the construct being assessed, and (3) allow meaningful interpretations of results and comparison of scores for students who need and receive accommodations and students who do not need and do not receive accommodations; • Has a process to individually review and allow exceptional requests for a small number of students who require accommodations beyond those routinely allowed. • Ensures that accommodations for all required assessments do not deny 	<p>See responses under Critical elements 4.2 and 5.1.</p>	<p>For the SAT:</p> <ul style="list-style-type: none"> • 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. • 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 (evidence submitted for element 5.1 will address this concern). <p>Evidence 2.3d: Lists accommodations but does not provide evidence that these accommodations do not alter the construct being assessed and allow meaningful interpretations of results and comparison of scores. Suggested evidence could include a review of the research on each accommodation, with evidence from research that the accommodation does not alter the construct being assessed and does allow meaningful interpretations of results and comparison of scores. Note that this may differ for accommodations, depending on the construct being measured (for example, read aloud of passages could alter the reading comprehension construct, while it may not alter a mathematics construct).</p> <p>From SAT Review</p> <ul style="list-style-type: none"> • 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

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STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

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.		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.
Section 5.3 Summary Statement		
<p><u> X </u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Evidence of the State’s process for ensuring that students with disabilities are included in the SAT with clear guidelines for parents about accommodations and the receipt of college-reportable scores. • 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. 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

Critical Element 5.4 – Monitoring Test Administration for Special Populations

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State monitors test administration in its districts and schools to ensure that appropriate assessments, with or without accommodations, are selected for all students with disabilities and ELs so that they are appropriately included in assessments and receive accommodations that are:</p> <ul style="list-style-type: none"> • 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. 	<p>Evidence #5.4c: Spring 18 Accommodations Correspondence. Xlsx.</p> <p>Evidence #5.4d: SAT Accommodations Monitoring (Spring 2019) Pages 4-6 demonstrate the addition of accommodations monitoring to standard security monitoring. Monitoring as a whole was previously reviewed under Critical Element 2.4. The two components of accommodations monitoring are post-observation interviews (section 3.3) and data analysis (section 3.7).</p> <p>Evidence #5.4e: Accommodations Monitoring List – College Board.xlsx (Spring 2019) This demonstrates the list of schools contacted for accommodations monitoring for College Board assessments in Michigan. This is the list referenced under “3.1 Monitoring List” in Evidence #5.4c.</p>	<p>For all assessments:</p> <ul style="list-style-type: none"> • Evidence that it monitors test administration in to ensure that appropriate assessments, with or without appropriate accommodations, are selected for students with disabilities under the Individuals with Disabilities Education Act, students covered by Section 504, and English learners so that they are appropriately included in assessments and receive accommodations that are: <ul style="list-style-type: none"> o Consistent with the State’s policies for accommodations. o Appropriate for addressing a student’s disability or language needs for each assessment administered. o 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. o Administered with fidelity to test administration procedures. <p>3.6 MDE interview questions for document 5.4d.</p> <p>The monitoring protocol meets the required critical elements.</p> <p>The pilot was implemented in a reasonable approach to addressing accommodation need and use providing valuable information for continuous improvement in the training and administration updates for the assessment. The follow-up process for the error correction would be helpful to provide as part of the process.</p> <p>The scale up plan for the monitoring process was not provided from the 2018 pilot. Are there results of the 2019 monitoring?</p>

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STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		<p>What is the plan for implementation? In MDE response they said there was a case where 20 students without IEP/504 received an accommodation. How did MDE include the results for those 20 students? What actions did MDE implement to avoid this in the future?</p> <p>Evidence 5.4e: there are only 8 schools for monitoring? What % of high schools does that represent and will the State consider that enough to demonstrate fidelity of implementation or is this part of the pilot and decisions have not been made.</p>
Section 5.4 Summary Statement		
X No additional evidence is required		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

SECTION 6: ACADEMIC ACHIEVEMENT STANDARDS AND REPORTING

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

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>For academic content standards: The State formally adopted challenging academic achievement standards in reading/language arts, mathematics, and science for all students, specifically:</p> <ul style="list-style-type: none"> 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; <p>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.</p>	<p>Evidence #6.1c: 2019 Michigan SAT Standard Setting Report (July 2019) PDF pages 3-4 and 32-33 (page numbers 4-5 and a misprinted 37-38 that should be 31-32 in the printed document) demonstrate four levels of achievement including two for high achievement and two for lower achievement. These pages also demonstrate achievement scores that differentiate among the achievement levels. PDF pages 44-53 (page numbers 43-52 in the printed document) demonstrate descriptions of the competencies associated with each achievement level.</p> <p>Evidence #6.1d: College Board Cuts (May 2019) Page 1 demonstrates that Michigan formally adopted academic achievement standards in grade 11. In Michigan, the State Superintendent has that authority, without needing approval from the State Board of Education, and the Interim State Superintendent is Sheila Alles. Page 1 also demonstrates four levels of achievement including two for high achievement and two for lower achievement.</p>	<p>For the SAT:</p> <ul style="list-style-type: none"> Evidence that the State’s 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. <p>4 levels of achievement, competencies associated with each level were provided.</p>
<p>Section 6.1 Summary Statement</p>		
<p><input checked="" type="checkbox"/> No additional evidence is required</p>		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

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

STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

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
<p>The State used a technically sound method and process that involved panelists with appropriate experience and expertise for setting:</p> <ul style="list-style-type: none"> • <u>Academic achievement standards and, as applicable, alternate academic achievement standards.</u> 	<p>Evidence #6.1c: 2019 Michigan SAT Standard Setting Report (July 2019) PDF pages 8-18 (page numbers 7-17 in the printed document) demonstrate that Michigan used a technically sound method and process involving panelists with appropriate experience and expertise, including Michigan teachers and psychometric experts, for setting grade 11 academic achievement standards.</p>	<p>For the SAT: • Evidence of a technically sound method and process that involved panelists with appropriate experience and expertise for setting its academic achievement standards.</p> <p>Evidence 6.1c: pages 19-20, panelists seem appropriate. Method described is technically sound. CE is met.</p> <p>Process is listed in the 2019 Michigan SAT Standard Setting Report</p>
<p>Section 6.2 Summary Statement</p>		
<p>X No additional evidence is required</p>		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

Critical Element 6.3 – Challenging and Aligned Academic Achievement Standards

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p><u>For academic achievement standards:</u></p> <p>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.</p> <p>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</p>	<p>Evidence #6.1c: 2019 Michigan SAT Standard Setting Report (July 2019)</p> <p>PDF pages 44-53 (page numbers 43-52 in the printed document) demonstrate that Michigan’s academic achievement standards for 11th grade ELA and math are challenging and aligned with Michigan’s academic content standards for career- and college-ready education.</p>	<p>For the SAT:</p> <ul style="list-style-type: none"> • Evidence of how the academic achievement standards are challenging and aligned with the State’s academic content standards. <p>It was not clear that the PLDs provided demonstrate alignment with Michigan’s content standards. They may be based on MI’s content standards, evidence to support it was not provided. The concerns are related to CE 2.1 and alignment with academic content standards.</p> <p>From SAT Review</p> <ul style="list-style-type: none"> • 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. • 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- information on how well students have mastered the state standards.

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

STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

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		
<p><u> X </u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Evidence of how the academic achievement standards are challenging and aligned with the State’s academic content standards. <ul style="list-style-type: none"> ○ The concerns are related to CE 2.1 and alignment with academic content standards. 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

Critical Element 6.4 – Reporting

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>The State reports its assessment results for all students assessed, and the reporting facilitates timely, appropriate, credible, and defensible interpretations and uses of those results by parents, educators, State officials, policymakers and other stakeholders, and the public.</p> <p>The State reports to the public its assessment results on <u>student academic achievement for all students and each student group at each achievement level⁶</u></p> <p>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 <u>specific academic needs of students</u>, and the State also provides interpretive guides to support appropriate uses of the assessment results.</p> <ul style="list-style-type: none"> The State provides for the production and delivery of individual student interpretive, descriptive, and diagnostic reports after each administration of its academic content assessments that: 	<p>Reports on student academic achievement at each achievement level. See Critical Element 6.1</p> <p>Alternate Formats The College Board has indicated that they will address this issue collectively for all states in their final submission.</p> <p>For reports made available through Michigan directly, this will be supplemented through technological and human supports.</p> <ul style="list-style-type: none"> Student-level reports are made available online, and Michigan has been working extensively with the US Department of Justice, Office of Civil Rights to ensure that State of Michigan websites comply with the Americans with Disabilities Act. Electronic reports can be made available through individuals’ preferred accessibility supports, such as screen readers or refreshable Braille. Data is also being reported to student information systems through a system called MI-LEARN, which will allow leverage of those systems’ existing supports. Upon request through the assessment office, the Michigan Department of Education – Low Incidence Outreach can assist parents and students individually in ensuring that their support needs are met, such as through finding service delivery tools or converting materials as needed. 	<p>For the SAT:</p> <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> The production and delivery of individual student interpretive, descriptive, and diagnostic reports after each administration of its assessments that: <ul style="list-style-type: none"> Report the student’s achievement in terms of the State’s grade-level academic achievement standards (including performance-level descriptors). 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. <p>Evidence that the state reports student’s achievement in terms of the State’s grade-level academic achievement standards is not provided, including cut scores and PLDs. The CE requires this to be reported to the public and evidence of this was not provided.</p> <p>Suggestions for report consideration include explanation so that stakeholders understand the difference between SAT score reporting by achievement level vs. traditional college readiness score reporting, given multiple uses of the single assessment.</p>

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.

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STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<ul style="list-style-type: none"> ○ Provide valid and reliable information regarding a <u>student’s academic achievement</u>; ○ Report the <u>student’s academic achievement</u> in terms of the State’s grade-level academic achievement standards; ○ Provide information to help parents, teachers, and principals interpret the test results and address the specific <u>academic needs of students</u>; ○ Are provided in an understandable and uniform format; ○ Are, to the extent practicable, written in a language that parents and guardians can understand or, if it is not practicable to provide written translations to a parent or guardian with limited English proficiency, are orally translated for such parent or guardian; ○ Upon request by a parent who is an individual with a disability as defined by the ADA, as amended, are provided in an alternative format accessible to that parent. ● The State follows a process and timeline for delivering individual student reports to parents, teachers, and principals as soon as practicable after each test administration. 		<p>Parent information provided was limited related to the academic content standards performance.</p> <p>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.</p> <p>Evidence of process and timeline is needed from states that student reports are provided to teachers, principals and parents as soon as practicable.</p> <p>Alternate formats: MI indicated Low Incidence Outreach assist parents and students individually in ensuring that their support needs are met but this was not in the documents, only in response to USDE request.</p>

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

STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
Section 6.4 Summary Statement		
<p><u> X </u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Evidence of the production and delivery of individual student interpretive, descriptive, and diagnostic reports after each administration of its assessments that: <ul style="list-style-type: none"> • Report the student’s achievement in terms of the State’s grade-level academic achievement standards (including performance-level descriptors). 		

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

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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
<p>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.</p> <p>The State’s technical criteria include a determination that the assessment:</p> <ul style="list-style-type: none"> • Is aligned with the challenging State academic standards; and • Addresses the depth and breadth of those standards. <p>AND</p> <p>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</p>	<p>N/A</p>	<p>N/A</p>

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

STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>cognitive disabilities who may be assessed with an AA-AAAS.</p> <p>AND</p> <p>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—</p> <ul style="list-style-type: none"> • 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. 		
<p>Section 7.1 Summary Statement</p>		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

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

Academic Assessments

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>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—</p> <ul style="list-style-type: none"> • 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. 	<p>N/A</p>	<p>N/A</p>
<p>Section 7.2 Summary Statement</p>		
<p>___ No additional evidence is required or</p> <p>___ The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • [list additional evidence needed w/brief rationale] 		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

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
<p>The locally selected, nationally recognized high school academic assessment:</p> <ul style="list-style-type: none"> • Is equivalent to or more rigorous than the statewide assessment, with respect to— <ul style="list-style-type: none"> ○ 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— <ul style="list-style-type: none"> ○ 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; ○ 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. 	<p>N/A</p>	<p>N/A</p>
<p>Section 7.3 Summary Statement</p>		
<p>___ No additional evidence is required or ___ The following additional evidence is needed/provide brief rationale: • [list additional evidence needed w/brief rationale]</p>		

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

STATE ASSESSMENT PEER REVIEW NOTES FOR MICHIGAN- SAT

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.