



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

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

April 10, 2020

Dear Superintendent Kishimoto:

Thank you for submitting Hawaii's application for the Innovative Assessment Demonstration Authority (IADA) authorized in section 1204 of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA). I appreciate the work of you and your team to develop this IADA proposal.

I am writing to provide initial feedback based on the U.S. Department of Education's (the Department's) review of the Hawaii Department of Education (HIDOE) IADA application. As you know, in addition to the Department's review of the application, we conducted, as required by the statute, a peer review of the application. Peer reviewers examined the application using the program requirements and selection criteria described in 34 CFR §§200.105 and 200.106. The goal of the peer review was to inform the Department regarding whether the proposed system is comparable to the State assessments, valid, reliable, of high technical quality, consistent with relevant, nationally recognized professional and technical standards, and provides unbiased, rational, and consistent determinations of progress toward meeting the ambitious, State-designed long-term goals for academic achievement.

Based on our review of the peer feedback and our own analysis of the application, I am requesting additional information to ensure the State's application meets all statutory and regulatory requirements, as detailed in the enclosed table. In addition, information is requested to strengthen your State's application regarding a few of the selection criteria. I am also enclosing a copy of the peer technical review forms. Please note that the Department's feedback may differ from that contained in the peer review form. I encourage you to read the full peer review forms for additional suggestions and recommendations regarding HIDOE's application.

I also want to raise an additional general concern with the pilot assessments that are described in the State's IADA application. It appears that the State proposes an innovative assessment system comprised of two components. The first component is a shortened version of the current Statewide reading/language arts and mathematics summative assessment (approximately half the length of the current State test). The second component is described as standards-based local assessments that are housed in a State-sponsored software system. The application appears to establish that the shortened Statewide summative assessment is the only assessment that will be used in the State's accountability system. The local assessment results will be reported to parents in a standards-based format but will not be part of the State's system of school accountability.

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

This design does not match the expectations for an innovative assessment system for a statewide assessment that is used in the State's accountability system. I am also concerned that the design will not meet the requirements of section 1111(b)(2)(B) of the ESEA for all statewide assessments. There is no required length for a State assessment and HIDOE could choose to shorten its current assessments (outside of IADA) and submit that assessment for the Department's peer review of State assessments. In the review of HIDOE's application, the peers and Department staff raised serious questions that whether the proposed shortened summative assessment would be able to assess the full breadth and depth of the State's academic content standards in reading/language arts and mathematics. HIDOE will need to attend to this concern, particularly, in its response to this interim feedback. Department staff will contact you to support Hawaii in addressing the items enclosed with this letter.

ESEA section 1204(f)(4) requires the Department to issue a written determination within 90 days of a State's submission of its IADA application, which is April 27, 2020, for the HIDOE application. Given this statutory requirement, I ask that you provide the requested additional information and submit it through OMB Max within 10 calendar days of receiving this letter. If you would like more time to submit additional information, please contact the OESE State Assessment team at oesse.assessment@ed.gov and indicate your new submission date. Please recognize that if the Department accommodates your request for additional time, a determination on the HIDOE IADA application may be rendered after the 90-day period.

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

Sincerely,

/s/

Frank T. Brogan
Assistant Secretary for
Elementary and Secondary Education

Enclosures

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

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

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

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<p>paragraphs (b)(3) and (b)(7)-(9) of this section, the State measures each student’s academic proficiency based on the challenging State academic standards for the grade in which the student is enrolled;</p>	<p>assesses the same depth and breadth of the academic content standards as the statewide assessment, especially given the proposed differences in item types when compared to the statewide assessment.</p>
<p>(3) Express student results or competencies consistent with the challenging State academic achievement standards under section 1111(b)(1) of the Act and identify which students are not making sufficient progress toward, and attaining, grade-level proficiency on such standards;</p>	<ul style="list-style-type: none"> • Evidence that the that the proposed innovative assessment used for accountability purposes (i.e., the shortened version of the statewide assessment) will express student results consistent with the State’s challenging academic achievement standards, given that the design for the shortened assessment assesses student differently (e.g., no constructed response items) than the statewide assessment.
<p>(4)(i) Generate results, including annual summative determinations as defined in paragraph (b)(7) of this section, that are valid, reliable, and comparable for all students and for each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act, to the results generated by the State academic assessments described in 34 CFR 200.2(a)(1) and section 1111(b)(2) of the Act for such students.</p> <p>Consistent with the SEA’s or consortium’s evaluation plan under 34 CFR 200.106(e), the SEA must plan to annually determine comparability during each year of its demonstration authority period in one of the following ways:</p> <p>(A) Administering full assessments from both the innovative and statewide assessment systems to all students enrolled in participating schools, such that at least once in any grade span (i.e., 3-5, 6-8, or 9-12) and subject for which there is an innovative assessment, a statewide assessment in the same subject would also be administered to all such students. As part of this determination, the innovative assessment and statewide assessment need not be administered to an individual student in the same school year.</p>	<ul style="list-style-type: none"> • Evidence that the innovative assessment used for accountability determinations (i.e., the shortened version of the statewide assessment) produces annual summative determinations that are valid, reliable, and comparable for each subgroup of students (e.g., a plan to ensure that adequate samples of subgroups of students are included in pilot results to assess comparability at the subgroup level).

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<p>(B) Administering full assessments from both the innovative and statewide assessment systems to a demographically representative sample of all students and subgroups of students described in section 1111(c)(2) of the Act, from among those students enrolled in participating schools, such that at least once in any grade span (i.e., 3-5, 6-8, or 9-12) and subject for which there is an innovative assessment, a statewide assessment in the same subject would also be administered in the same school year to all students included in the sample.</p> <p>(C) Including, as a significant portion of the innovative assessment system in each required grade and subject in which both an innovative and statewide assessment are administered, items or performance tasks from the statewide assessment system that, at a minimum, have been previously pilot tested or field tested for use in the statewide assessment system.</p> <p>(D) Including, as a significant portion of the statewide assessment system in each required grade and subject in which both an innovative and statewide assessment are administered, items or performance tasks from the innovative assessment system that, at a minimum, have been previously pilot tested or field tested for use in the innovative assessment system.</p> <p>(E) An alternative method for demonstrating comparability that an SEA can demonstrate will provide for an equally rigorous and statistically valid comparison between student performance on the innovative assessment and the statewide assessment, including for each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act;</p> <p>(ii) Generate results, including annual summative determinations as defined in paragraph (b)(7) of this section, that are valid, reliable, and comparable, for all students and for each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act, among</p>	

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<p>participating schools and LEAs in the innovative assessment demonstration authority. Consistent with the SEA’s or consortium’s evaluation plan under 34 CFR 200.106(e), the SEA must plan to annually determine comparability during each year of its demonstration authority period;</p>	
<p>(5)(i) Provide for the participation of all students, including children with disabilities and English learners; (ii) Be accessible to all students by incorporating the principles of universal design for learning, to the extent practicable, consistent with 34 CFR 200.2(b)(2)(ii); and (iii) Provide appropriate accommodations consistent with 34 CFR 200.6(b) and (f)(1)(i) and section 1111(b)(2)(B)(vii) of the Act;</p>	<ul style="list-style-type: none"> • Evidence that the innovative assessment used for accountability (the shortened summative assessment) will provide appropriate accommodations, specifically plans for Braille versions of the assessment.
<p>(6) For purposes of the State accountability system consistent with section 1111(c)(4)(E) of the Act, annually measure in each participating school progress on the Academic Achievement indicator under section 1111(c)(4)(B) of the Act of at least 95 percent of all students, and 95 percent of students in each subgroup of students described in section 1111(c)(2) of the Act, who are required to take such assessments consistent with paragraph (b)(1)(ii) of this section;</p>	<ul style="list-style-type: none"> • Evidence that the State will include the results of the innovative assessment in the calculation of the Academic Achievement indicator in the State’s accountability system for all students taking this assessment, beginning in the 2020-2021 school year. For example, HIDOE must reconcile the inconsistency on the application on page 31 and page 33.
<p>7) Generate an annual summative determination of achievement, using the annual data from the innovative assessment, for each student in a participating school in the demonstration authority that describes-- (i) The student’s mastery of the challenging State academic standards under section 1111(b)(1) of the Act for the grade in which the student is enrolled; or (ii) In the case of a student with the most significant cognitive disabilities assessed with an alternate assessment aligned with alternate academic achievement standards under section 1111(b)(1)(E) of the Act, the student’s mastery of those standards</p>	<ul style="list-style-type: none"> • Evidence that the innovative assessment used for accountability determinations provides an annual summative determination of achievement that sufficiently describes the student’s mastery of the State’s challenging academic standards, given that the innovative assessment is substantially different in length than the current statewide assessment.

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<p>(8) Provide disaggregated results by each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act, including timely data for teachers, principals and other school leaders, students, and parents consistent with 34 CFR 200.8 and section 1111(b)(2)(B)(x) and (xii) and section 1111(h) of the Act, and provide results to parents in a manner consistent with paragraph (b)(4)(i) of this section and part 200.2(e);</p>	<ul style="list-style-type: none"> • Evidence that the pilot assessments will provide disaggregated results by each subgroup of students, including timely data for teachers, principals and other school leaders, students, and parents, given that local assessment results will be reported in conjunction with State assessment results on parent reports (e.g., provide a rationale for reporting results of State assessments on the same document as local assessment results that are not standardized).
<p>(9) Provide an unbiased, rational, and consistent determination of progress toward the State’s long-term goals for academic achievement under section 1111(c)(4)(A) of the Act for all students and each subgroup of students described in section 1111(c)(2) of the Act and a comparable measure of student performance on the Academic Achievement indicator under section 1111(c)(4)(B) of the Act for participating schools relative to non-participating schools so that the SEA may validly and reliably aggregate data from the system for purposes of meeting requirements for--</p> <p>(i) Accountability under sections 1003 and 1111(c) and (d) of the Act, including how the SEA will identify participating and non-participating schools in a consistent manner for comprehensive and targeted support and improvement under section 1111(c)(4)(D) of the Act; and</p> <p>(ii) Reporting on State and LEA report cards under section 1111(h) of the Act.</p>	<ul style="list-style-type: none"> • Evidence requested in section (b)(7) above is also needed to satisfy this requirement.

Application Selection Criteria	Required information from the SEA
<p>(a)(2) The plan the SEA or consortium, in consultation with any external partners, if applicable, has to--</p> <p>(i) Develop and use standardized and calibrated tools, rubrics, methods, or other strategies for scoring innovative assessments throughout the demonstration authority period, consistent with relevant nationally recognized professional and technical standards, to ensure inter-rater reliability and comparability of innovative assessment results consistent with 34 CFR part 200.105(b)(4)(ii), which may include evidence of inter-rater reliability; and</p> <p>(ii) Train evaluators to use such strategies, if applicable;</p>	<ul style="list-style-type: none"> • Evidence that the State has a plan to develop and use standardized and calibrated tools, rubrics, methods, or other strategies for scoring the local assessments throughout the demonstration authority period, consistent with relevant nationally recognized professional and technical standards, to ensure inter-rater reliability and comparability of innovative assessment results (e.g., local assessment scores and scores from the shortened version of the statewide assessment).
<p>(a)(3) If the system will initially be administered in a subset of schools or LEAs in a State--</p> <p>(i) The strategies the SEA, including each SEA in a consortium, will use to scale the innovative assessment to all schools statewide, with a rationale for selecting those strategies;</p> <p>(ii) The strength of the SEA’s or consortium’s criteria that will be used to determine LEAs and schools that will initially participate and when to approve additional LEAs and schools, if applicable, to participate during the requested demonstration authority period; and</p> <p>(iii) The SEA’s plan, including each SEA in a consortium, for how it will ensure that, during the demonstration authority period, the inclusion of additional LEAs and schools continues to reflect high-quality and consistent implementation across demographically diverse LEAs and schools, or contributes to progress toward achieving such implementation across demographically diverse LEAs and schools, including diversity based on enrollment of subgroups of students described in section 1111(c)(2) of the Act and student achievement. The plan must also include annual benchmarks toward achieving high-quality and consistent implementation across participating</p>	<ul style="list-style-type: none"> • Evidence that the State has a plan to includes annual benchmarks toward achieving high-quality and consistent implementation across participating schools that are, as a group, demographically similar to the State as a whole during the demonstration authority period, using the demographics of initially participating schools as a baseline (e.g., how is school or regional leadership engaged in identifying schools to participate in the innovative pilot assessment).

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<p>schools that are, as a group, demographically similar to the State as a whole during the demonstration authority period, using the demographics of initially participating schools as a baseline.</p>	
<p>(b)(2) The extent and depth of SEA, including each SEA in a consortium, and LEA capacity to implement the innovative assessment system considering the availability of technological infrastructure; State and local laws; dedicated and sufficient staff, expertise, and resources; and other relevant factors. An SEA or consortium may also describe how it plans to enhance its capacity by collaborating with external partners that will be participating in or supporting its demonstration authority. In evaluating the extent and depth of capacity, the Secretary considers--</p> <p>(i) The SEA’s analysis of how capacity influenced the success of prior efforts to develop and implement innovative assessments or innovative assessment items; and</p> <p>(ii) The strategies the SEA is using, or will use, to mitigate risks, including those identified in its analysis, and support successful implementation of the innovative assessment.</p>	<ul style="list-style-type: none"> • Evidence of the strategies HIDOE is using, or will use, to mitigate risks and support successful implementation of the local assessment component of the innovative assessment.
<p>(c)(1) The extent to which the timeline reasonably demonstrates that each SEA will implement the system statewide by the end of the requested demonstration authority period, including a description of--</p> <p>(i) The activities to occur in each year of the requested demonstration authority period;</p> <p>(ii) The parties responsible for each activity; and</p> <p>(iii) If applicable, how a consortium’s member SEAs will implement activities at different paces and how the consortium will implement interdependent activities, so long as each non-affiliate member SEA begins using the innovative assessment in the same school year consistent with 34 CFR part 200.104(b)(2);</p>	<ul style="list-style-type: none"> • Evidence that the implementation plan reasonably demonstrates a description of the parties responsible for each activity listed in the timeline (e.g., vendor, State staff, and estimate level of effort).

Application Selection Criteria	Required information from the SEA
<p>(c)(2) The adequacy of the project budget for the duration of the requested demonstration authority period, including Federal, State, local, and non-public sources of funds to support and sustain, as applicable, the activities in the timeline under paragraph (c)(1) of this section, including--</p> <p>(i) How the budget will be sufficient to meet the expected costs at each phase of the SEA’s planned expansion of its innovative assessment system; and</p> <p>(ii) The degree to which funding in the project budget is contingent upon future appropriations at the State or local level or additional commitments from non-public sources of funds.</p>	<ul style="list-style-type: none"> • Evidence of more detail about the degree to which funding in the project budget is contingent upon future appropriations at the State or local level or additional commitments from non-public sources of funds.
<p>(d)(1) The extent to which the SEA or consortium has developed, provided, and will continue to provide training to LEA and school staff, including teachers, principals, and other school leaders, that will familiarize them with the innovative assessment system and develop teacher capacity to implement instruction that is informed by the innovative assessment system and its results;</p>	<ul style="list-style-type: none"> • Evidence that describes how the training provided to LEA and school staff will develop teacher capacity to implement instruction that is informed by the innovative assessment system.
<p>(d)(2) The strategies the SEA or consortium has developed and will use to familiarize students and parents with the innovative assessment system;</p>	<ul style="list-style-type: none"> • Evidence that there are plans to make various materials accessible to all parents, specifically for: <ul style="list-style-type: none"> ○ Those parents without Internet access. ○ Parents who have limited English proficiency. ○ Parents with a disability as defined by the Americans with Disabilities Act (ADA).
<p>(d)(4) If the system includes assessment items that are locally developed or locally scored, the strategies and safeguards (e.g., test blueprints, item and task specifications, rubrics, scoring tools, documentation of quality control procedures, inter-rater reliability checks, audit plans) the SEA or consortium has developed, or plans to develop, to validly and reliably score such items, including how the strategies engage and support teachers and other staff in designing, developing, implementing, and</p>	<ul style="list-style-type: none"> • Evidence of: <ul style="list-style-type: none"> ○ A detailed description of the strategies and safeguards (e.g., test blueprints, item and task specifications, rubrics, scoring tools, documentation of quality control procedures, inter-rater reliability checks, audit plans) has developed, or plans to develop, in order to validly and reliably score local assessment items, including how the strategies engage and support teachers and

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<p>validly and reliably scoring high-quality assessments; how the safeguards are sufficient to ensure unbiased, objective scoring of assessment items; and how the SEA will use effective professional development to aid in these efforts.</p>	<p>other staff in designing, developing, implementing, and validly and reliably scoring high-quality assessments.</p> <ul style="list-style-type: none"> ○ How the safeguards are sufficient to ensure unbiased, objective scoring of assessment items. ○ How HIDOE will use effective professional development to aid in these efforts.
<p>(e)(1) The strength of the proposed evaluation of the innovative assessment system included in the application, including whether the evaluation will be conducted by an independent, experienced third party, and the likelihood that the evaluation will sufficiently determine the system’s validity, reliability, and comparability to the statewide assessment system consistent with the requirements of 34 CFR part200.105(b)(4) and (9);</p>	<ul style="list-style-type: none"> ● Evidence that the proposed third-party evaluation will address the innovative assessment system’s validity and reliability, specifically: <ul style="list-style-type: none"> ○ Plans to independently verify alignment of the two assessments (the short summative State test and the local assessments) with the State’s academic content standards. ○ Plans to address the local assessments’ validity and reliability (beyond inter-rater reliability). ● Plans to address the comparability and alignment between the short statewide summative assessment and the local assessments.
<p>(e)(2) The SEA’s or consortium’s plan for continuous improvement of the innovative assessment system, including its process for-- (i) Using data, feedback, evaluation results, and other information from participating LEAs and schools to make changes to improve the quality of the innovative assessment; and (ii) Evaluating and monitoring implementation of the innovative assessment system in participating LEAs and schools annually.</p>	<ul style="list-style-type: none"> ● Evidence of a process for evaluating and monitoring the implementation of the local assessment component of the innovative assessment system.