



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Jeff Riley  
Commissioner of Education  
Massachusetts Department of Elementary and Secondary Education  
75 Pleasant Street  
Malden, MA 02148-4906

April 10, 2020

Dear Commissioner Riley:

Thank you for submitting Massachusetts' 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 Massachusetts Department of Elementary and Secondary Education (DESE) 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 several 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 DESE's application. Department staff will contact you to support Massachusetts 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 24, 2020, for the DESE application. Given this statutory requirement, in order for the Department to make a determination by the statutory deadline, I ask that you provide the requested additional information and submit it through OMB Max within 10 calendar days from the date of this letter. We recognize, however, that you may need more time, particularly in light of the national emergency caused by the novel coronavirus, COVID-19, and the extended school closures in Massachusetts. If you would like more time to submit additional information, please contact my

400 MARYLAND AVE., SW, WASHINGTON, DC 20202  
[www.ed.gov](http://www.ed.gov)

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

team at [ESEA.Assessment@ed.gov](mailto:ESEA.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 DESE 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: Sam Ribnick, Special Advisor, Innovative Assessments and Data

**Items that Require Additional Information or Revision in Massachusetts’ Innovative Assessment Demonstration Authority Plan**

<b>Regulatory Requirement</b>	<b>Required information from the SEA</b>
<p>(2)(i) Align with the challenging State academic content standards under section 1111(b)(1) of the Act, including the depth and breadth of such standards, for the grade in which a student is enrolled; and</p> <p>(ii) May measure a student’s academic proficiency and growth using items above or below the student’s grade level so long as, for purposes of meeting the requirements for reporting and school accountability under sections 1111(c) and 1111(h) of the Act and paragraphs (b)(3) 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>	<ul style="list-style-type: none"> <li>• Evidence that the innovative assessment will align with the challenging State science 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, specifically:               <ul style="list-style-type: none"> <li>○ A detailed draft test blueprint that describes how the pilot assessment will assess both the depth and breadth of the science standards.</li> <li>○ A description of the procedures the State will use to independently evaluate the alignment of the pilot assessment (e.g., an alignment evaluation conducted by persons or entities not involved with the innovative pilot).</li> </ul> </li> </ul>
<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 <b>one of the following ways:</b></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</p>	<ul style="list-style-type: none"> <li>• Evidence that the innovative assessment will generate results that are valid, reliable and comparable for each sub-group of students, specifically by describing how the matrix sampling design described in the application will result in comparable sub-group level results.</li> </ul>

Regulatory Requirement	Required information from the SEA
<p>(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> <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</p>	

Regulatory Requirement	Required information from the SEA
<p>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;                      (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 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>	

Application Selection Criteria	Required information from the SEA
<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"> <li>• Evidence of criteria used in assessing progress of the pilot assessment throughout the project timeline, specifically detailed descriptions regarding the evaluation of reliability, validity, and comparability that will be conducted on the assessment in its final form.</li> <li>• Evidence the procedures the State will use to independently evaluate the alignment of the innovative assessment (as noted in regulatory (b)(2) above).</li> </ul>