

UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

February 4, 2020

The Honorable Jeffrey C. Riley Commissioner Massachusetts Department of Elementary and Secondary Education 75 Pleasant Street Malden, MA 02148

Dear Commissioner Riley:

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 Massachusetts Department of Elementary and Secondary Education (MA DESE) to prepare for the peer review, which occurred in August 2019. Specifically, MA DESE submitted evidence regarding the MCAS, its general assessment in reading/language arts (R/LA) and mathematics in grades 3-8.

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 MA DESE'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:

o General assessment in R/LA and mathematics in grades 3-8 (MCAS): Substantially meets requirements of the ESEA, as amended by the Every Student Succeeds Act (ESSA).

Substantially meets requirements means that these components meet most of the requirements of the statute and regulations but some additional information is required. Please note that while your State met many of the requirements related to State administration of the MCAS assessments, the Department has significant concerns related to test design and alignment with your State's academic content standards. Alignment to the State's challenging academic standards is critical to having a valid and reliable

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Page 2 – The Honorable Jeffrey C. Riley

assessment system. The Department must see that the State has made substantial progress on these critical elements in the next peer review or the Department may take additional enforcement action.

The specific list of items required for MA DESE to submit is enclosed with this letter. Within 30 days of receipt of this letter, MA DESE must provide to the Department a plan and timeline by which it will submit the additional documentation. Upon submission of the plan, the Department will reach out to the State educational agency (SEA) to determine a mutually agreeable schedule. Resubmission should occur once all necessary evidence is complete (rather than in multiple submissions). 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: <u>OESE.Assessment@ed.gov</u>.

Sincerely,

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

Enclosures

cc: Michol Stapel, Associate Commissioner for Student Assessment

Critical Elements Where Additional Evidence is Needed to Meet the Requirements for Massachusetts' Assessment System

Critical Element	Evidence Needed
2.1 – Test Design and Development	 For the MCAS mathematics and R/LA: Evidence that the MCAS measures the breadth and depth of the State's grade level academic content standards.
	 For the MCAS R/LA: Evidence that the tests support the intended interpretations and uses of the results.
2.2 – Item Development	 For the MCAS mathematics and R/LA: Evidence that the State uses reasonable and technically sound procedures to develop and select items to assess student achievement based on the State's academic content standards in terms of content and cognitive process, including higher-order thinking skills.
3.1 – Overall Validity, including Validity Based on Content	For the MCAS mathematics and R/LA: • Evidence requested in critical element 2.1.
3.2 – Validity Based on Cognitive Processes	 For the MCAS mathematics and R/LA: Adequate validity evidence that its assessments tap the intended cognitive processes appropriate for each grade level as represented in the State's academic content standards (e.g., cognitive labs, expert judgment, and other empirical evidence).
3.3 – Validity Based on Internal Structure	 For the MCAS mathematics and R/LA: Adequate validity evidence that the scoring and reporting structures of the 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.
3.4 – Validity Based on Relationships with Other Variables	 For the MCAS mathematics and R/LA: Adequate validity evidence that the State's assessment scores are related as expected with other variables, including plans to address findings from the 8th grade correlation study.
4.2 – Fairness and Accessibility	For the MCAS mathematics and R/LA: • Evidence of reasonable and appropriate steps to ensure the assessments are accessible to all students and fair across student groups in the design, development and analysis of the assessments (e.g., DIF analysis for subgroups, especially English learners, summary analysis of results for students with disabilities versus students who do not have disabilities, subgroup summary statistics and estimates of reliability, decision consistency), including, to the extent practicable, how principles of universal design for learning (UDL) are addressed.
6.3 – Challenging and Aligned Academic Achievement Standards	For the MCAS mathematics and R/LA: • Evidence that the State's academic achievement standards are challenging and aligned with the State's academic content standards (e.g., evidence that students who score at the proficient or above level have mastered what students are expected to know and be able to do and are on track to succeed in college and the workforce by the time they graduate from high school).

STATE ASSESSMENT PEER REVIEW NOTES FOR MASSACHUSETTS

U. S. DEPARTMENT OF EDUCATION

Peer Review of State Assessment Systems

August 2019 State Assessment Peer Review Notes



U. S. Department of Education Office of Elementary and Secondary Education Washington, D.C. 20202

Note: Peer review notes provide the combined recommendations of the individual peers to the U.S. Department of Education (Department), based on the statute and regulations, the Department's peer review guidance, and the peers' professional judgement of the evidence submitted by the State. These assessment peer review notes, however, do not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for assessment peer review. Although the peer notes inform the Secretary's consideration of each State's assessment system, the Department makes the final decision regarding whether the assessment system meets the requirements in the statute and regulations. As a result, these peer notes may not completely align with the final determination made by the Department.

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SECTION 1: STATEWIDE SYSTEM OF STANDARDS AND ASSESSMENTS

Critical Element 1.1 – State Adoption of Academic Content Standards for All Students

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
For academic content standards:		No additional evidence requested.
The State formally adopted challenging academic content standards for all students in reading/language arts, mathematics and science and applies its academic content standards to all public schools and public school students in the State.		
Section 1.1 Summary Statement		
 No additional evidence is required or The following additional evidence is needed/provide brief rationale: [list additional evidence needed w/brief rationale] 		

Critical Element 1.2 – Challenging Academic Content Standards

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
For academic content standards: The State's challenging academic content standards in reading/language arts, mathematics, and science are aligned with entrance requirements for credit-bearing coursework in the system of public higher education in the State and relevant State career and technical education standards.		No additional evidence requested.
Section 1.2 Summary Statement		
No additional evidence is required or		
 The following additional evidence is needed/provide brief rationale: [list additional evidence needed w/brief rationale] 		

Critical Element 1.3 – Required Assessments

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State's assessment system includes		No additional evidence requested.
innual general and alternate assessments		
ligned with grade-level academic		
achievement standards or alternate		
academic achievement standards in:		
Reading/language arts (R/LA) and		
mathematics in each of grades 3-8		
and at least once in high school		
(grades 9-12);		
• Science at least once in each of three		
grade spans (3-5, 6-9 and 10-12).		
6 ·F (, -, -,).		
AND		
The State's academic content		
assessments must be the same		
assessments administered to all students		
in the tested grades, with the following		
exceptions:		
• Students with the most significant		
cognitive disabilities may take an		
alternate assessment aligned with		
alternate academic achievement		
standards.		
A State may permit an LEA to		
administer a nationally recognized		
high school academic assessment in		
lieu of the State high school		
assessment if certain conditions are		
met.		
• A State that administers an end-of-		
course high school mathematics		
assessment may exempt an 8th grade		
student from the mathematics		
assessment typically administered in		

eighth grade and allow the student to		
take the State end-of-course		
mathematics test instead.		
 The Department may have approved 		
the State, under the Innovative		
Assessment Demonstration		
Authority, to permit students in some		
LEAs to participate in a		
demonstration assessment system in		
lieu of participating in the State		
assessment.		
Section 1.3 Summary Statement		
No additional evidence is required or		
The following additional evidence is needed/provide brief rationale:		
 [list additional evidence needed w/ 	/brief rationale]	

Critical Element 1.4 – Policies for Including All Students in Assessments

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State requires the inclusion of all public elementary and secondary school students in its assessment system and clearly and consistently communicates this requirement to districts and schools. • For students with disabilities, policies state that all students with disabilities in the State, including those children with disabilities publicly placed in private schools as a means of providing special education and related services, must be included in the assessment system; • For ELs: • 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	reference)	No additional evidence requested.
ELs are exempt from one administration of its reading/ language arts assessment. O If a State has developed native language assessments for ELs in R/LA, ELs must be assessed in R/LA in English if they have been enrolled in U.S. schools for three or more consecutive years, except, if a district determines, on a case-by-case basis, that		
native language assessments would yield more accurate and reliable information, the district may assess a student with native		

	language assessments for a		
	period not to exceed two		
	additional consecutive years.		
0	If the State uses the flexibility		
	for Native American language		
	schools and programs: (1) the		
	State provides the content		
	assessment in the Native		
	American language to all		
	students in the school or		
	program; (2) the State submits		
	such content assessment for peer		
	review as part of its State		
	assessment system; and (3) the		
	State continues to provide ELP		
	assessments and services for ELs		
	as required by law. The State		
	must assess in English the		
	students' achievement in R/LA		
	in high school.		
Section	1.4 Summary Statement		
No	additional evidence is required or		
The following additional evidence is needed/provide brief rationale:			
•	[list additional evidence needed w/	/brief rationale]	

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

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

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
If the State has developed or amended challenging academic standards and assessments, the State has conducted meaningful and timely consultation with: State leaders, including the Governor, members of the State legislature and State board of education (if the State has a State board of education). Local educational agencies (including those located in rural areas). Representatives of Indian tribes located in the State. Teachers, principals, other school leaders, charter school leaders (if the State has charter schools), specialized instructional support personnel, paraprofessionals, administrators, other staff, and parents. 		Department staff determined that MA DESE demonstrated meaningful consultation in the development of the Massachusetts academic content standards consistent with the requirements under ESEA section 1111(a)(1)(A). In particular, Department staff note that MA DESE adopted the Common Core Standards in 2010 and adopted revised standards in 2017. A report describing the standards revision process provided a lengthy list of individuals and organizations that were contacted to provide input and the State also provided a public comment period.
Section 1.5 Summary Statement		
_x No additional evidence is required.		

SECTION 2: ASSESSMENT SYSTEM OPERATIONS

Critical Element 2.1 – Test Design and Development

Critical Element 2.1 – Test Design and Des	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Citical Element	reference)	State Documentation or Evidence
The State's test design and test development process is well-suited for the content, is technically sound, aligns the assessments to the depth and breadth of the State's academic content standards	 2.1.1 Draft 2018 Next-Generation MCAS and MCAS-Alt Technical Report, pages 5-7 Expanded statements regarding the purposes of the MCAS tests. 2.1.2 Findings from a Content Alignment Study of the 	Previous request: For the MCAS mathematics and reading/language arts: •Statements about the purpose(s) of each MCAS assessment in sufficient detail to support validity. •Evidence that the MCAS measures the breadth and depth
for the grade that is being assessed and includes: • Statement(s) of the purposes of the assessments and the intended interpretations and uses of results;	2017 Massachusetts Grades 3-8 English Language Arts and Mathematics Next- Generation MCAS Tests (June 2019) Expanded statements regarding the purposes of the MCAS tests.	of the State's grade level academic content standards. For the MCAS reading/language arts: •Evidence that the tests support the intended interpretations and uses of the results.
Test blueprints that describe the structure of each assessment in sufficient detail to support the development of assessments that are technically sound, measure the depth and breadth of the State's gradelevel academic content standards	 Categorical consistency (the extent to which content standards were covered by the test items in each content domain) Depth of Knowledge (DOK) consistency (the extent to which the DOK on an item aligned with the DOK expressed on relevant standard) Range of knowledge (the extent to which the test 	2.1.1 Appears sufficient for the first bullet; assessment purposes stated.
 and support the intended interpretations and uses of the results. Processes to ensure that each academic assessment is tailored to the knowledge and skills included in the State's academic content standards, reflects appropriate 	items represented the full set of standards in each domain) • Balance of representation (the extent to which standards are represented evenly across the items) The study found strong content alignment for math across all grades and content domains, providing evidence of content validity that includes alignment with	2.1.2 From the evidence alignment document: "It must be emphasized that these analyses focus on only a single year of test administration. For grades 3-8, the MCAS program partially releases operational items following test administration. Operational items are replaced each year" (p. 3).
 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 	the DOK expressed on the standards. One area of adequate content alignment was noted – grade 8 statistics and probability (summary of mathematics findings: pp. 12-20). The study found strong overall content alignment for ELA across all grades and domains; in writing particularly strong alignment was found when	There appears to still be a gap and the test blueprints and evidence of the alignment between the reviewed assessment and the blue print is needed. The alignment study addresses an examination of depth and breadth of the assessment with respect to the content
and intended uses and interpretations of results.	considering the writing rubrics in the analysis. One area of improvement noted was including more content	standards. However, the State's plan to address

- If the State administers a computeradaptive assessment, it makes proficiency determinations with respect to the grade in which the student is enrolled and uses that determination for all reporting.
- If the State administers a content assessment that includes portfolios, such assessment may be partially administered through a portfolio but may not be *entirely* administered through a portfolio.

representation for reading informational texts in grades 7 and 8 (summary of ELA findings: pp. 21-31). Summary of overall findings: pp. 32-34

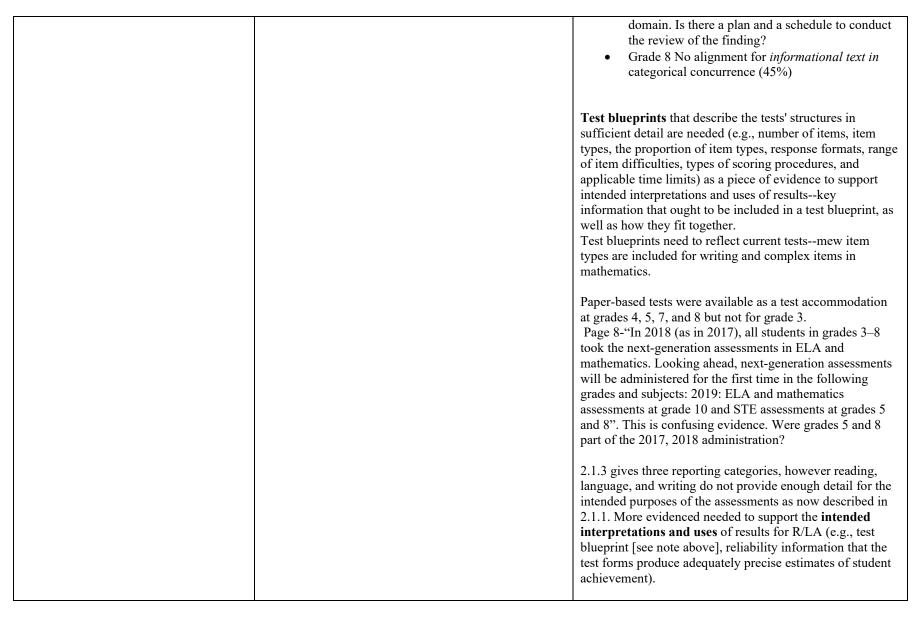
2.1.3 ELA Reporting Categories

The ELA reporting categories document is provided in response to peer reviewer comments that the reporting categories for ELA were not provided in the initial submission in order to provide evidence that the tests support the intended interpretations and uses of the results.

shortcomings/recommendations noted in the alignment study report is needed.

Examples:

- Grade 8 statistics & probability (improve DOK consistency)
- Writing is 30% of the reporting category in grades 5-8. While no recommendations were found stated in the report there are areas in writing that should be addressed. Language is 25% and is also measured by writing. Which represents 55% when combining writing and language in the ELA test reporting category. The blueprint does not make this clear.
- Writing Standards did not meet the alignment criteria for range of knowledge writing at grades 8; and depth of knowledge consistency and range of knowledge. Writing standards had no range of knowledge.
- Language standards did not meet categorical concurrence nor range of knowledge.
- Had a weak balance of representation in language standards
- Grade 4 had a weak range of knowledge in reading standards for literature (Domain is 55%)
 Informational Text
- Grade 5 & 6 was weak in range of knowledge in informational text (45%). Writing and language standards had no range of knowledge (30+25%=55%). Grade 6 categorical concurrence in language standards were not aligned (25%).
- Grade 7 No alignment for categorical concurrence in *informational text* (45%) and language standards (25%); range of knowledge in informational text, writing (30%) and language standards.
- Grade 7 & 8 reading informational text: need to carefully examine reading passages and items to understand why alignment is problematic for this



Section 2.1 Summary Statement

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

- Evidence of an alignment study that includes test blueprints for the current test.
- Test blueprints that describe the structure of the current tests with greater clarity and specificity.
- Evidence related to the ELA assessment that supports intended interpretations and uses of results, particularly with regard to outcomes providing a basis for instructional improvement.

Critical Element 2.2 – Item Development

Critical Element	Evidence (Record document and page # for	Comments/Notes/Questions/Suggestions Regarding State
Circui Element	future reference)	Documentation or Evidence
The State uses reasonable and technically	2.2.1 2017 Next-Generation MCAS and	Previous request:
sound procedures to develop and select	MCAS-Alt Technical Report (pages 19-26)	For the MCAS mathematics and reading/language arts:
items to:	Pages 19-26 of the 2017 Next-Generation	•Evidence that the State uses reasonable and technically sound
Assess student achievement based	MCAS and MCAS-Alt Technical Report	procedures to develop and select items to assess student
on the State's academic content	describe the process for developing and	achievement based on the State's academic content standards in
standards in terms of content and	selecting items, including standards alignment	terms of content and cognitive process, including higher- order
cognitive process, including higher-		thinking skills.
order thinking skills.	2.2.2 Findings from a Content Alignment Study	
	of the 2017 Massachusetts Grades 3-8 English	The comment in 2.1 about test blueprint detail applies here as it
	Language Arts and Mathematics Next-	relates to cognitive processes.
	Generation MCAS Tests (June 2019)	
	The alignment study (as described in more	Evidence of design and intent is presented with some support
	detail in 2.1) provides evidence that the items	validating intent; however, more robust evidence supporting design
	used to assess student achievement are based on	and development and support of intent in terms of content and
	the academic content standards in terms of	cognitive processes is needed.
	content and cognitive process	There is a discussion of what cognitive levels are and how they can
		be assessed, what is lacking is a clear blueprint demonstrating that
		items are assigned based on cognitive levels in addition to number
		of points per item and the domain being measured.
		Also, how is the DOK of writing determined using Webb?
		Item writer qualifications are listed. The development of items do
		state an expectation of qualifications beyond content. However,
		more information is needed about qualificationsit is unclear what
		the specialization/experience is with students who are ELs and/or
		students with disabilities.
		students with disdonnies.
Saction 2.2 Summary Statement		

Section 2.2 Summary Statement

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

- Test blueprints that reflect the cognitive levels being addressed, not just the domain, and more generally, more robust evidence supporting design and development and support of intent in terms of content and cognitive processes.
- Alignment findings demonstrating the tests (and test forms) are aligned to the blueprints for every student who is assessed.

Critical Element 2.3 – Test Administration

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	reference)	300000 - 000000000000000000000000000000
The State implements policies and		No additional evidence requested.
rocedures for standardized test		
dministration; specifically, the State:		
Has established and communicates to		
educators clear, thorough and		
consistent standardized procedures		
for the administration of its		
assessments, including administration		
with accommodations;		
Has established procedures to ensure		
that general and special education		
teachers, paraprofessionals, teachers		
of ELs, specialized instructional		
support personnel, and other		
appropriate staff receive necessary		
training to administer assessments		
and know how to administer		
assessments, including, as necessary,		
alternate assessments, and know how		
to make use of appropriate		
accommodations during assessments		
for all students with disabilities;		
If the State administers technology-		
based assessments, the State has		
defined technology and other related		
requirements, included technology-		
based test administration in its		
standardized procedures for test		
administration, and established		
contingency plans to address possible		
technology challenges during test		
administration.		
	l .	

The following additional evidence is needed/provide brief rationale:
• [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.

Critical Element 2.4 – Monitoring Test Administration

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
The State adequately monitors the		No additional evidence requested.
administration of its State assessments to		
ensure that standardized test		
administration procedures are		
implemented with fidelity across districts		
and schools. Monitoring of test		
administration should be demonstrated for		
all assessments in the State system: the		
general academic assessments and the		
AA-AAAS.		
Section 2.4 Summary Statement		
No additional evidence is required or		
The following additional evidence is needed/provide brief rationale:		
• [list additional evidence needed w/brief rationale]		
	-	

Critical Element 2.5 – Test Security

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State has implemented and		No additional evidence requested.
documented an appropriate set of policies		
and procedures to prevent test		
irregularities and ensure the integrity of		
test results through:		
Prevention of any assessment		
irregularities, including maintaining		
the security of test materials (both		
during test development and at time		
of test administration), proper test		
preparation guidelines and		
administration procedures, incident-		
reporting procedures, consequences		
for confirmed violations of test		
security, and requirements for annual		
training at the district and school		
levels for all individuals involved in		
test administration;		
 Detection of test irregularities; 		
Remediation following any test		
security incidents involving any of		
the State's assessments;		
• Investigation of alleged or factual test		
irregularities.		
 Application of test security 		
procedures to all assessments in the		
State system: the general academic		
assessments and the AA-AAAS.		
Section 2.5 Summary Statement		
No additional evidence is required or		
ivo additional evidence is required of		
The following additional evidence is no	reded/provide brief rationale:	
[list additional evidence needed w/		
• [iist additional evidence needed W/	oriei ranonale]	

Critical Element 2.6 – Systems for Protecting Data Integrity and Privacy

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	reference)	
The State has policies and procedures in		No additional evidence requested.
place to protect the integrity and		
confidentiality of its test materials, test-		
related data, and personally identifiable		
nformation, specifically:		
To protect the integrity of its test-		
related data in test administration,		
scoring, storage and use of results;		
To secure student-level assessment		
data and protect student privacy and		
confidentiality, including guidelines		
for districts and schools;		
To protect personally identifiable		
information about any individual		
student in reporting, including		
defining the minimum number of		
students necessary to allow reporting		
of scores for all students and student		
groups.		
Section 2.6 Summary Statement		
No additional evidence is required or		
The following additional evidence is no	eeded/provide brief rationale:	
• [list additional evidence needed w	/brief rationale]	

SECTION 3: TECHNICAL QUALITY – VALIDITY

Critical Element 3.1 – Overall Validity, Including Validity Based on Content

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
The State has documented adequate overall validity evidence for its assessments consistent with nationally recognized professional and technical testing standards. The State's validity evidence includes evidence that: The State's academic assessments measure the knowledge and skills specified in the State's academic content standards, including: Documentation of adequate alignment between the State's assessments and the academic content standards the assessments are designed to measure in terms of content (i.e., knowledge and process), , balance of content, and cognitive complexity; Documentation that the assessments address the depth and breadth of the content standards; If the State has adopted alternate academic achievement standards and administers alternate assessments aligned with those standards, the assessments show adequate alignment to the State's academic content standards for the grade in which the student is enrolled in terms of content match (i.e., no unrelated content) and the breadth of content and cognitive complexity determined	3.1.1 Findings from a Content Alignment Study of the 2017 Massachusetts Grades 3-8 English Language Arts and Mathematics Next-Generation MCAS Tests (June 2019) The alignment study (described in more detail in 2.1) found strong evidence that the 3-8 MCAS assessments represent the full range of assessable content on the state's academic content standards. The study also found strong evidence of a range of cognitive complexity on both tests. Summary of ELA findings: pp. 21-31 Summary of mathematics findings: pp. 12-20 Summary of overall findings: pp. 32-34	Previous request: For the MCAS mathematics and reading/language arts: •Evidence of the adequate alignment between the State's MCAS assessments and the academic content standards the assessments are designed to measure in terms of content (i.e., knowledge and process), the breadth and depth of the State's academic content standards, balance of content, and cognitive complexity (this may include the results of the AIR NAEP- MCAS alignment study, when the results of that study are available, in order to demonstrate support for the cognitive complexity of the MCAS assessments). The state should provide a systematic process and timeline to address any gaps or weaknesses identified in the alignment study. See related comment about study recommendations and need for a plan and timeline to address issues of alignment in 2.1. More detail in the test blueprintsee relevant comment in CE 2.1. As previously mentioned, the study presented demurs to a single year of assessment, in addition the technical manual has little discussion of cognitive level of test items nor the level demanded by the blueprint, nor the percent of forms that have complete alignment to blueprint.

in test design to be appropriate for students with the most significant cognitive disabilities.		
Section 3.1 Summary Statement		
_X The following additional evidence is needed/provide brief rationale: • A systematic process and timeline to address any gaps or weaknesses identified in the alignment study. • Related to comments in CE 2.1, test blueprints that describe the structure of the current tests with greater clarity and specificity.		

Critical Element 3.2 - Validity Based on Cognitive Processes

Critical Element	Evidence (Record document and page # for	Comments/Notes/Questions/Suggestions Regarding State
Critical Element	future reference)	Documentation or Evidence
The State has documented adequate validity evidence that its assessments tap: the intended cognitive processes appropriate for each grade level as represented in the State's academic content standards.	3.2.1 Findings from a Content Alignment Study of the 2017 Massachusetts Grades 3-8 English Language Arts and Mathematics Next- Generation MCAS Tests (June 2019) The alignment study found strong alignment overall with respect to the DOK expressed in the standards and on the MCAS items, providing evidence that the cognitive processes required by the MCAS test items were in alignment with the expectations expressed in the Massachusetts curriculum frameworks.	Previous request: For the MCAS mathematics and reading/language arts: •Adequate validity evidence that its assessments tap the intended cognitive processes appropriate for each grade level, as represented in the 2011 academic frameworks (the State's academic content standards). ———————————————————————————————————

Section 3.2 Summary Statement

- __X_ The following additional evidence is needed/provide brief rationale:
 - Cognitive labs, expert judgment, and/or other empirical evidence to more directly show that intended cognitive processes are being measured. The body of evidence must be robust (not just one of the aforementioned examples of evidence).

Critical Element 3.3 - Validity Based on Internal Structure

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State has documented adequate validity evidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State's <u>academic content</u> <u>standards</u> .	3.3.1 3.3.2 3.3.3 3.3.4 2017 Next-Generation MCAS and MCAS-Alt Technical Report, p. 59 Appendix M – Classical Reliability CFA Presentation to the Technical Advisory Committee (May 2019)	Previous request: For the MCAS mathematics and reading/language arts: •Adequate validity evidence that the scoring and reporting structures of its assessments are consistent with the subdomain structures of the State's academic content standards on which the intended interpretations and uses of results are based. ———————————————————————————————————
	MCAS CFA Executive Summary The 2017 MCAS tests were reported according to overall student results and results by reporting category, where each reporting category represents content standards described in the Massachusetts Curriculum Frameworks. Although there is ample evidence in the MCAS technical report to establish unidimensionality in the test construct, a confirmatory factory analysis (CFA) was conducted on the grade 3-8 MCAS tests in ELA and Mathematics to establish concordance among the MCAS items and the reporting category (factors). Overall, the CFA study found strong evidence of model fit supporting the claim that the MCAS items were associated with their relevant factors (reporting categories); all factor loadings were positive and average factor loadings were in the moderate range. following Inter-factor correlations were very high, indicating a strong unidimensional model for all tests.	Additional validity evidence based on the internal structure of the assessments is needed (e.g., evidence that ancillary constructs needed for success on the assessments do not provide inappropriate barriers to measuring the achievement of all students, reports of differential item functioning (DIF) analyses that show whether particular items function differently for relevant student groups, other studies demonstrating the assessment consistently measures the construct it was designed to measure with limited impact from extraneous factors like student demographics, evidence that the subscales reported actually measure discrete dimensions in the state academic content standards and are meaningful for the intended purposes of the assessment). The studies do not support the intended purpose of the assessment in that the purpose of instructional improvement is not served by having three ELA subscales that all are highly correlated to the point that the subscale does not identify specific areas of student performance for improvement. Additionally, the results suggest there was a small but significant mode effect for each test, and ELA tended to have a larger effect size than mathematics. P.61 What is the follow-up here if any?

Section 3.3 Summary Statement

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

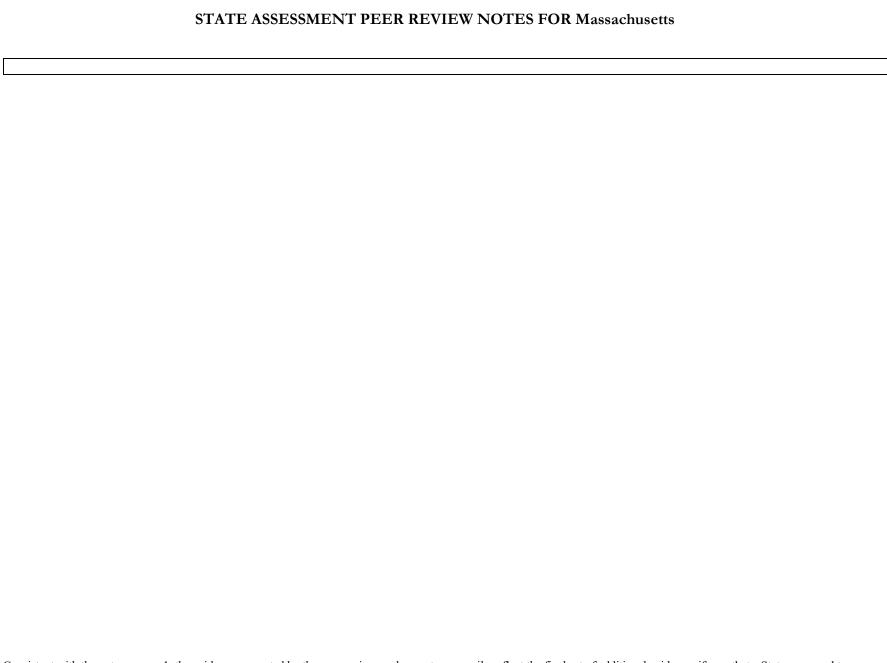
 Validity evidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State's academic content standards on which the intended interpretations and uses of results are based.

Critical Element 3.4 - Validity Based on Relations to Other Variables

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State has documented adequate validity evidence that the State's assessment scores are related as expected with other variables.	3.4.1 MCAS and Student Achievement Presentation to the Technical Advisory Committee (May 2019) The Department conducted a study of the relationship between next-generation MCAS achievement, course-assignment and grade point averages. The study follows 64,000 students who took the grade 8 MCAS tests in ELA and math in 2017 through their first year of high school where they took 80,000 different ELA and 77,000 different mathematics courses. Results show that between 27% (ELA) and 32% (Mathematics) of the variation in placements and student grades in grade 9 was associated with the MCAS scores from the grade 8 summative assessment. As an illustration, students scored at the Meeting Expectations level in grade 8 were, for example, twice as likely as students at who scored Partially Meeting Expectations to earn a B or higher in general math courses (68% v. 33%). The correlation between MCAS scores and course grades provides evidence that the MCAS achievement level descriptors and standards are aligned with the teaching and learning expectations at the next level. It also serves as validation for the claims in the achievement level descriptors that students who meet expectations are well prepared for academic work at the next level. Results from this study were presented to the Massachusetts TAC and will be included in the MCAS technical report.	Previous request: For the MCAS mathematics and reading/language arts: •Adequate validity evidence that the State's MCAS assessment scores are related as expected with other variables, especially those expected to be more directly related to student achievement.
Section 3.4 Summary Statement		

Section 3.4 Summary Statement

- _X__ The following additional evidence is needed/provide brief rationale:
 - Validity evidence that the State's assessment scores are related as expected with other variables, especially those expected to be more directly related to student achievement.



SECTION 4: TECHNICAL QUALITY – OTHER

Critical Element 4.1 – Reliability

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
The State has documented adequate		No additional evidence requested.
reliability evidence for its assessments for		
the following measures of reliability for		
the State's student population overall and		
each student group consistent with		
nationally recognized professional and		
technical testing standards. If the State's		
assessments are implemented in multiple		
States, measures of reliability for the		
assessment overall and each student group		
consistent with nationally recognized		
professional and technical testing		
standards, including:		
Test reliability of the State's		
assessments estimated for its student		
population;		
 Overall and conditional standard 		
error of measurement of the State's		
assessments, including any domain or		
component sub-tests, as applicable;		
Consistency and accuracy of		
estimates in categorical classification		
decisions for the cut scores,		
achievement levels or proficiency		
levels based on the assessment		
results;		
• For computer-adaptive tests,		
evidence that the assessments		
produce test forms with adequately		
precise estimates of a student's		
academic achievement.		
Section 4.1 Summary Statement		
No additional evidence is required or		

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

Critical Element 4.2 – Fairness and Accessibility

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
For all State academic assessments, assessments should be developed, to the extent practicable, using the principles of universal design for learning (UDL) (see definition ¹).	4.2.1. DIF Presentation to the Technical Advisory Committee (May 2019) 4.2.2 Appendix I – Differential Item Functioning Results Massachusetts evaluates operational test items for DIF among students with disabilities (SWD). However, SWDs are not a focal group during the item bias review process	Previous request: For the MCAS mathematics and reading/language arts: •Evidence of reasonable and appropriate steps to ensure that its assessments are accessible to all students and fair across student groups in the design, development and analysis of its assessments. (e.g., summary analysis of
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.	each year <i>prior</i> to testing. This is a result of concerns with sampling the large variation in types and severity of disabilities and levels of students' needs. The sampling variation is of greater concern before testing when only field test samples are available (Buzick & Stone, 2011). Massachusetts discussed methods for identifying DIF for	results for students with disabilities versus students who do not have disabilities on each of the MCAS tests (e.g., DIF, subgroup summary statistics and estimates of reliability, decision consistency).
design, development and analysis.	SWDs at the May 2019 Technical Advisory Committee (TAC) meeting. The TAC endorsed continuing the use of evaluating item DIF on operational (common) items. They made the following suggestions that Massachusetts is	More detail and information needed regarding implementation of UDL principles in design and development.
	First, Massachusetts will identify methods for sampling SWDs in conducting DIF analyses on this group. One promising sampling proposal	The evidence focuses on identifying, documenting, and remediating item DIF between SWD students and non-SWD students. The evidence does not address subgroup performance differences and accessibility of the assessments across the subgroups.
	being studied involves identifying the group of SWDs a) by the "level of need" variable reported in the Student Information Management System (SIMS), and analyzing DIF only for students in	Evidence of implementation of the planned studies, their findings, and how findings will be addressed are needed.
	levels of need 1 and 2, rather than for those in levels 1 through 4; and b) include students with disability codes that are most likely to take the general assessment and achieve the grade-level content standards, such as students with health,	More information needed about qualifications of those involved in design and developmentunclear about specialization/experience with students who are ELs and/or students with disabilities.

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

- communication, specific learning, and emotional disabilities.
- Second, the TAC recommended that
 Massachusetts conduct forensic studies each year
 on the operational items using the DIF analyses
 and other quantitative and qualitative
 item codes (such as item difficulty,
 discrimination, and qualitative item
 characteristics) to identify item characteristics
 associated with higher DIF statistics. These
 forensic examinations are intended to inform
 item development and improve item accessibility.
- Third, the TAC recommended that Massachusetts continue investigating DIF methodologies to identify methods that are sensitive to DIF detection for all item types. Currently, the state is investigating the use of two DIF methodologies: SIBTest and an IRT- based approach to identify non-uniform DIF. These two methods will be compared to the current Standardization DIF method currently being used.

Timelines for these studies and their findings will proceed as follows:

- In 2019, the Massachusetts will complete its initial investigation into methods for sampling SWDs and for use of alternate DIF methods.
- Massachusetts will use the findings of this initial study to conduct its first forensic evaluation of DIF for SWDs on the 2018 MCAS items. Any findings, if relevant, will be employed in future item development.
- Changes to the business rules calculating DIF for the subgroup of SWDs and other subgroups will be reflected in the business rules for calculating DIF in the 2018 MCAS Technical Report and in subsequent reports.

 If results warrant the inclusion of DIF for SWDs for item review, the Department will begin using these item evaluation criteria for the development 	
of MCAS items starting in the 2020-2021 school	
year.	
References	
Buzick, H., & Stone, E. (2011). Recommendations for	
Conducting Differential Item Functioning (DIF) Analyses for Students with Disabilities Based on	
Previous DIF Studies. Educational Test Service Report # RR-11-34.	
Dorans, N. J., & Holland, P. W. (1992). DIF Detection	
and Description: Mantel-Haenszel and Standardization. Education Testing Service.	
Martinkova, P., Drabinova, A., Liaw, Y-L, Sanders, E.,	
McFarland, J.L., & Price, R. M. (2017). Checking equity: Why differential item functioning analysis	
should be a routine part of developing conceptual	
assessments. CBE Life Science Education, 16;2.	

Section 4.2 Summary Statement

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

• Evidence of reasonable and appropriate steps to ensure that its assessments are accessible to all students and fair across student groups in the design, development and analysis of its assessments (e.g., summary analysis of results for students with disabilities versus students who do not have disabilities on each of the MCAS tests, subgroup summary statistics and estimates of reliability, decision consistency), including how principles of universal design for learning (UDL) are addressed.

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 requested.		
Section 4.3 Summary Statement				
No additional evidence is required or The following additional evidence is needed/provide brief rationale: • [list additional evidence needed w/brief rationale]				

Critical Element 4.4 – Scoring

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State has established and documented standardized scoring procedures and protocols for its assessments that are designed to produce reliable and meaningful results, facilitate valid score interpretations, and report assessment results in terms of the State's academic achievement standards.		No additional evidence requested.
Section 4.4 Summary Statement		
No additional evidence is required or The following additional evidence is no [list additional evidence needed w/		

Critical Element 4.5 – Multiple Assessment Forms

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
If the State administers multiple forms of		No additional evidence requested.
academic assessments within a content		
area and grade level, within or across		
school years, the State ensures that all		
forms adequately represent the State's		
academic content standards and yield		
consistent score interpretations such that		
the forms are comparable within and		
across school years.		
Section 4.4 Summary Statement		
No additional evidence is required or		
The following additional evidence is needed/provide brief rationale:		
• [list additional evidence needed w/brief rationale]		
	•	

Critical Element 4.6 – Multiple Versions of an Assessment

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
If the State administers any of its assessments in multiple versions within a subject area (e.g., online versus paper-based delivery; or a native language version of the academic content assessment), grade level, or school year, the State: • Followed a design and development process to support comparable interpretations of results for students tested across the versions of the assessments; • Documented adequate evidence of comparability of the meaning and interpretations of the assessment results.		No additional evidence requested.
Section 4.6 Summary Statement		
No additional evidence is required or		
The following additional evidence is not experience. • [list additional evidence needed w/	•	

Critical Element 4.7 – Technical Analysis and Ongoing Maintenance

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
TIL CO.	reference)	No additional evidence requested.
The State:		1 to additional ovidence requested.
 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.		
Section 4.7 Summary Statement		
No additional evidence is required or		
·		
The following additional evidence is needed/provide brief rationale:		
• [list additional evidence needed w		
	,	

SECTION 5: INCLUSION OF ALL STUDENTS

Critical Element 5.1 – Procedures for Including Students with Disabilities

ord document and page # for future Comments/Notes/Questions/Suggestions Regarding	Critical Element
State Documentation or Evidence	
No additional evidence requested.	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.
	TIO (100 INTO INTO INTO IOI IOI IOI IOI IOI IOI IOI IOI IOI I
	with the most significant cognitive disabilities" that addresses factors related to cognitive functioning and adaptive behavior;

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

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
f- ,, 4h ,, - d- i,, -, hi-l- 4h 4- d- ,, 4 i-	reference)	State Documentation or Evidence
for the grade in which the student is enrolled; and		
Develop, disseminate information on,		
and promote the use of appropriate accommodations to ensure that a		
student with the most significant		
cognitive disabilities who does not		
take an AA-AAAS participates in		
academic instruction and assessments		
for the grade in which the student is		
enrolled.		
 The State has in place and monitors 		
implementation of guidelines for IEP		
teams to apply in determining, on a		
case-by-case basis, which students		
with the most significant cognitive		
disabilities will be assessed based on		
alternate academic achievement		
standards, if applicable. Such		
guidelines must be developed in		
accordance with 34 CFR § 200.6(d). ²		
Section 5.1 Summary Statement		
No additional evidence is required or		
The following additional evidence is needed/provide brief rationale:		
[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.

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

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State has in place procedures to		No additional evidence requested.
ensure the inclusion of all ELs in public		
lementary and secondary schools in the		
State's academic content assessments and		
learly communicates this information to		
istricts, schools, teachers, and parents,		
ncluding, at a minimum:		
Procedures for determining whether		
an EL should be assessed with a		
linguistic accommodation(s);		
 Information on accessibility tools 		
and features available to all students		
and assessment accommodations		
available for ELs;		
Assistance regarding selection of		
appropriate linguistic		
accommodations for ELs, including		
to the extent practicable, assessments		
in the language most likely to yield		
accurate and reliable information on		
what those students know and can do		
to determine the students' mastery of		
skills in academic content areas until		
the students have achieved English		
language proficiency.		
ection 5.2 Summary Statement		
No additional evidence is required or		
The following additional evidence is ne	-	
• [list additional evidence needed w/	brief rationalel	

Critical Element 5.3 – Accommodations

Critical Element 5.5 – Accommodations Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
The State makes available appropriate		No additional evidence requested.
accommodations and ensures that its		
assessments are accessible to students		
with disabilities and ELs, including ELs		
with disabilities. Specifically, the State:		
• Ensures that appropriate		
accommodations, such as,		
interoperability with, and ability to		
use, assistive technology, are		
available to measure the academic		
achievement of students with		
disabilities.		
• Ensures that appropriate		
accommodations are available for		
ELs;		
Has determined that the		
accommodations it provides (1) are		
appropriate and effective for meeting		
the individual student's need(s) to		
participate in the assessments, (2) do		
not alter the construct being assessed,		
and (3) allow meaningful		
interpretations of results and		
comparison of scores for students		
who need and receive		
accommodations and students who		
do not need and do not receive		
accommodations;		
Has a process to individually review		
and allow exceptional requests for a		
small number of students who require		
accommodations beyond those		
routinely allowed.		
• Ensures that accommodations for all		
required assessments do not deny		

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence	
students with disabilities or ELs the opportunity to participate in the assessment and any benefits from participation in the assessment.			
Section 5.3 Summary Statement			
No additional evidence is required or	No additional evidence is required or		
The following additional evidence is needed/provide brief rationale: • [list additional evidence needed w/brief rationale]			

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
	1 cici ciice)	No additional evidence requested.
The State monitors test administration in		ino additional evidence requested.
s districts and schools to ensure that		
ppropriate assessments, with or without		
ecommodations, are selected for all		
udents with disabilities and ELs so that		
ney are appropriately included in		
ssessments and receive accommodations		
nat are:		
Consistent with the State's policies		
for accommodations;		
Appropriate for addressing a		
student's disability or language needs		
for each assessment administered;		
Consistent with accommodations		
provided to the students during		
instruction and/or practice;		
Consistent with the assessment		
accommodations identified by a		
student's IEP Team under IDEA,		
placement team convened under		
Section 504; or for students covered		
by Title II of the ADA, the individual		
or team designated by a district to		
make these decisions; or another		
process for an EL;		
Administered with fidelity to test		
administration procedures;		
Monitored for administrations of all		
required academic content		
assessments and AA-AAAS.		
assessments and the thints.		
ection 5.4 Summary Statement		1
No additional evidence is required or		

The following additional evidence is needed/provide brief rationale:

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
[list additional evidence needed w/brief rationale]		

SECTION 6: ACADEMIC ACHIEVEMENT STANDARDS AND REPORTING

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

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
For academic content standards:		No additional evidence requested.
The State formally adopted challenging		
academic achievement standards in		
reading/language arts, mathematics, and		
science for all students, specifically:		
• The State formally adopted academic		
achievement standards in the required		
tested grades and, at its option,		
alternate academic achievement		
standards for students with the most		
significant cognitive disabilities;		
• The State applies its academic		
achievement standards to all public		
elementary and secondary school		
students enrolled in the grade to		
which they apply, with the exception		
of students with the most significant		
cognitive disabilities to whom		
alternate academic achievement		
standards may apply;		
The State's academic achievement		
standards and, as applicable, alternate		
academic achievement standards, include:		
(1) at least three levels of achievement,		
with two for high achievement and a third		
for lower achievement; (2) descriptions of		
the competencies associated with each		
achievement level; and (3) achievement		
scores that differentiate among the		
achievement levels.		
Section 6.1 Summary Statement		
No additional evidence is required or		

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

Critical Element 6.2 – Achievement Standards Setting

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State used a technically sound method and process that involved panelists with appropriate experience and expertise for setting: • Academic achievement standards and, as applicable, alternate academic achievement standards.		No additional evidence requested.
Section 6.2 Summary Statement		
No additional evidence is required or The following additional evidence is needed/provide brief rationale: • [list additional evidence needed w/brief rationale]		

Critical Element 6.3 - Challenging and Aligned Academic Achievement Standards

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
For academic achievement standards: The State's academic achievement standards are challenging and aligned with the State's academic content standards and with entrance requirements for credit-bearing coursework in the system of public higher education in the State and relevant State career and technical education standards such that a student who scores at the proficient or above level has mastered what students are expected to know and be able to do by the time they graduate from high school in order to succeed in college and the workforce.	6.3.1 MCAS and Student Achievement Presentation to the Technical Advisory Committee (May 2019) As described in 3.4, the state's research shows high correlations between MCAS scores and course grades, providing evidence that the MCAS achievement level descriptors and standards are aligned with the teaching and learning expectations at the next level.	Previous request: For the MCAS mathematics and reading/language arts: •Evidence that the State's academic achievement standards are challenging and aligned with the State's academic content standards (e.g., evidence that students who score at the proficient or above level have mastered what students are expected to know and be able to do and are on track to succeed in college and the workforce by the time they graduate from high school). Evidence does not address the critical element and actually provides evidence that is not compelling. Evidence demonstrates that the relationship between student HS performance and ELA grade 8 performance is not as strong as one would hope.
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		The evidence suggests that the math test is a better predictor of student HS English performance than the ELA test is. A 0.546 score to ELA GPA for math versus a 0.507 for ELA score to ELA GPA This evidence still does not address the original issue identified that the subscales being reported are highly correlated and there is no evidence that these subscales align to state content standards, nor does the state provide convincing evidence the grade level assessments are aligned to what a student needs to know and can do to be successful at (at least) the next grade level. The State's plan for addressing the findings of the study/analyses in a manner that addresses this critical element is needed.

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

Section 6.3 Summary Statement

- X The following additional evidence is needed/provide brief rationale:
 - Evidence that the State's academic achievement standards are challenging and aligned with the State's academic content standards (e.g., evidence that students who score at the proficient or above level have mastered what students are expected to know and be able to do and are on track to succeed in college and the workforce by the time they graduate from high school), including how the State plans to address issues related to 8th grade math and ELA test score correlations to HS ELA GPA, for example.

Critical Element 6.4 – Reporting

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Officer Element	reference)	State Documentation or Evidence
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	6.4.1 Parent-Guardian Report Web Page Massachusetts provides assessment results in alternate formats (e.g., Braille or large print) upon request.	Previous request: For the MCAS mathematics and reading/language arts: •Evidence that assessment results are available in alternate formats (e.g., Braille or large print) upon request.
The State reports to the public its assessment results on student academic achievement for all students and each student group at each achievement level ³		The evidence appears sufficient to meet the request for this critical element; however, it is still unclear how a blind or non-English speaking parent would be alerted to the availability of the report simply by having a statement on a web page telling the parent in English on the screen who to contact to make such a request. There is no a discussion of alternate languages.
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		A comment: Does the state provide the report directly to the parents or are LEAs involved?
interpret the results and address the specific academic needs of students , and the State also provides interpretive guides to support appropriate uses of the assessment results.		
The State provides for the production and delivery of individual student interpretive, descriptive, and diagnostic reports after each administration of its academic content assessments that:		

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.

Critical	l Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
0	Provide valid and reliable	Telefence)	State Documentation of Evidence
O	information regarding a		
	student's academic		
	achievement;		
0	Report the <u>student's academic</u>		
O	achievement in terms of the		
	State's grade-level academic		
	achievement standards;		
0	Provide information to help		
0	parents, teachers, and principals		
	interpret the test results and		
	address the specific <u>academic</u>		
	needs of students;		
0	Are provided in an		
O	understandable and uniform		
	format;		
0	Are, to the extent practicable,		
Ū	written in a language that parents		
	and guardians can understand or,		
	if it is not practicable to provide		
	written translations to a parent or		
	guardian with limited English		
	proficiency, are orally translated		
	for such parent or guardian;		
0	Upon request by a parent who is		
	an individual with a disability as		
	defined by the ADA, as		
	amended, are provided in an		
	alternative format accessible to		
	that parent.		
The	e State follows a process and		
	eline for delivering individual		
	dent reports to parents, teachers,		
	principals as soon as practicable		
	er each test administration.		

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
Section 6.4 Summary Statement		

X No additional evidence is required or

• Note: Though the State meets the resubmission requirement, Peers are unclear how a blind or non-English speaking parent, for example, would be alerted to the availability of the report simply by having a statement on a web page telling the parent in English on the screen who to contact to make such a request. A suggestion is to provide information on the report regarding availability of alternate formats and languages.

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	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State has established technical criteria to use in its review of any submission of a locally selected, nationally recognized high school academic assessment. The State has completed this review using its established technical criteria and has found the assessment meets its criteria prior to submitting for the Department's assessment peer review. The State's technical criteria include a	N/A	N/A
 determination that the assessment: Is aligned with the challenging State academic standards; and Addresses the depth and breadth of those standards. 		
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.		
AND		

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The technical criteria established by the		
State in reviewing a locally selected,		
nationally recognized high school		
academic assessment must ensure that the		
use of appropriate accommodations does		
not deny a student with a disability or an		
EL—		
The opportunity to participate in the		
assessment; and		
• Any of the benefits from participation		
in the assessment that are afforded to		
students without disabilities or		
students who are not ELs.		
Section 7.1 Summary Statement		
No additional evidence is required or		
The following additional evidence is no	eeded/provide brief rationale:	
• [list additional evidence needed w/		
- Line additional evidence needed w/	orier ranonarej	

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
The State must have procedures in place o ensure that:	N/A	N/A
Before a district requests approval from the State to use a nationally recognized high school academic assessment, the district notifies all parents of high school students it serves— That the district intends to request approval from the State to use a nationally recognized high school academic assessment in place of the statewide academic assessment; Of how parents and, as appropriate, students may provide meaningful input regarding the district's request (includes students in public charter schools who would be included in such assessments); and Of any effect of such request on the instructional program in the district.		
Section 7.2 Summary Statement		

Element 7.3 -Comparability of the Locally Selected Nationally Recognized High School Academic Assessments with the State Assessments

Critical Flament	Evidence (Record document and page # for	Comments/Notes/Questions/Suggestions Regarding
Critical Element	future reference)	State Documentation or Evidence
The locally selected, nationally recognized high school academic assessment: Is equivalent to or more rigorous than the statewide assessment, with respect to— The coverage of academic content; The difficulty of the assessment; The overall quality of the assessment; and Any other aspects of the assessment that the State may establish in its technical criteria; Produces valid and reliable data on student academic achievement with respect to all high school students and each subgroup of high school students in the district that— Are comparable to student academic achievement data for all high school students and each subgroup of high school students produced by the statewide assessment at each academic achievement level; 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		
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.		
Section 7.3 Summary Statement		

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