



## 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

August 12, 2020

Dear Superintendent Kishimoto:

Thank you for submitting the revised application from the Hawaii Department of Education (HIDOE) for the Innovative Assessment Demonstration Authority (IADA) on June 30, 2020. The IADA is authorized in section 1204 of the Elementary and Secondary Education Act of 1965 (ESEA). It is designed to provide an opportunity for a State to pilot an innovative summative assessment in place of the State's existing assessment in a small number of schools, and to use the results in the State's accountability system, while scaling the innovative assessment over a number of years to eventually become the statewide assessment. I appreciate the work of you and your team to develop this revised IADA proposal.

The U.S. Department of Education (the Department) reviewed HIDOE's most recent IADA application to determine whether it met the requirements in ESEA section 1204 and the selection criteria described in 34 CFR §§ 200.105 and 200.106. The purpose of these reviews was to inform the Department regarding whether the proposed system provides comparable results to the State assessments that are valid, reliable, of high technical quality, consistent with relevant, nationally recognized professional and technical standards, and provide unbiased, rational, and consistent determinations of progress toward meeting the ambitious, State-designed long-term goals for academic achievement.

After considering the additional information you provided, I find that the State's revised IADA application still does not meet all statutory and regulatory requirements, as detailed in the enclosed table. Therefore, I am declining to approve HIDOE to implement its IADA proposal. In particular, the HIDOE IADA application proposed a summative assessment that is a shortened version of its existing statewide assessment. While the State's plan also included a pilot of local assessments, the State is not proposing to include those as part of the statewide assessment or accountability systems during the initial period of its IADA plan; rather, HIDOE hopes to be able to implement an assessment that could include local assessments in the summative score more towards the end of the IADA period. As a result, HIDOE's proposal does not meet the requirements of the IADA. I encourage HIDOE to consider the peers' and Department's feedback, including the information attached in the enclosed table, as you prepare for any future applications for IADA. The Department intends to invite another round of IADA applications later this year.

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.*

Page 2 – The Honorable Christina Kishimoto

Please contact my staff at [ESEA.Assessment@ed.gov](mailto:ESEA.Assessment@ed.gov) if you have additional questions regarding your IADA application or any of the feedback provided in the attached table. Thank you for the important work that you and your staff are doing to support the innovation that is possible through the ESSA. The Department looks forward to working with you to ensure that all children have the opportunity to reach their full potential.

Sincerely,

/s/

Frank T. Brogan  
Assistant Secretary for  
Elementary and Secondary Education

Enclosure

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

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

<b>Regulatory Requirement</b>	<b>Required information from the SEA</b>
<p><b><u>(b) Innovative assessment system. A demonstration that the innovative assessment system does or will--</u></b></p> <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                      (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 proposed innovative assessment used for accountability purposes (the shortened summative assessment) is sufficiently aligned to <b>full depth</b> of the State’s academic content standards. OR</li> <li>• Evidence that the innovative assessment system that is used for accountability purposes (comprised of only a shortened summative assessment) measures the full depth of the State’s academic content standards.</li> </ul>
<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"> <li>• Evidence that the shortened pilot assessment will sufficiently describe the student’s mastery of the State’s challenging academic standards, given that the innovative assessment is substantially different in length than the current statewide assessment, and does not contain constructed response items. OR</li> <li>• Evidence that the innovative assessment system (comprised of the shortened summative assessment and the classroom-based assessments) are used for accountability purposes and will sufficiently describe the student’s mastery of the State’s challenging academic standards.</li> </ul>
<p>(8) Provide disaggregated results by each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and</p>	<ul style="list-style-type: none"> <li>• Evidence that the local assessment component of the innovative pilot will be combined with the short summative component in the 2020-21 school</li> </ul>

<b>Regulatory Requirement</b>	<b>Required information from the SEA</b>
<p>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>	<p>year to calculate the overall summative score and included as part of the State’s accountability system for participating schools.</p>
<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"> <li>• Evidence that both components of the proposed innovative assessment system can provide an unbiased, rational, and consistent determination of progress toward the State’s long-term goals for academic achievement (e.g., both components of the proposed innovative assessment are combined with the short summative component in the 2020-21 school year to calculate the overall summative score and to be included as part of the accountability system for participating schools).</li> </ul>
<b>Application Selection Criteria</b>	<b>Required information from the SEA</b>
<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</p>	<ul style="list-style-type: none"> <li>• Evidence of a detailed description of the strategies and safeguards (e.g., item and task specifications, rubrics, scoring tools, documentation of quality control procedures, inter-rater reliability checks, audit plans) the</li> </ul>

Application Selection Criteria	Required information from the SEA
<p>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 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>State has developed, or plans to develop, in order to validly and reliably score locally created assessment items.</p>
<p>(e)(1) The strength of the proposed evaluation of the innovative assessment system included in the application, including whether the evaluation will be conducted by an independent, experienced third party, and the likelihood that the evaluation will sufficiently determine the system’s validity, reliability, and comparability to the statewide assessment system consistent with the requirements of 34 CFR part200.105(b)(4) and (9).</p>	<ul style="list-style-type: none"> <li>• Evidence that the proposed third-party evaluation will address the innovative assessment system’s validity and reliability, specifically plans to independently verify alignment of the two assessments (the short summative State test and the local assessments) with the State’s academic content standards.</li> <li>• Evidence of plans to address the comparability and alignment between the short Statewide summative assessment and the local assessments.</li> </ul>