

UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

November 2, 2021

The Honorable Elsie Arntzen Superintendent of Public Instruction Montana Office of Public Instruction P.O. Box 202501 Helena, MT 59620

Dear Superintendent Arntzen:

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). I appreciate the efforts of the Montana Office of Public Instruction (OPI) to prepare for the peer review, which occurred in March 2021. Specifically, OPI submitted evidence regarding the English language proficiency (ELP) general and alternate assessments.

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

- ELP general assessments (ACCESS) Substantially meets requirements of the ESEA.
- o ELP alternate assessments (Alternate ACCESS) Partially meets requirements of the ESEA.

The components that **partially meet requirements** do not meet a number of the requirements of the statute and regulations and/or the OPI will need to provide substantial additional information to demonstrate it meets the requirements. The Department expects that OPI may not be able to submit all of the required information within one year.

Substantially meets requirements means that these components meet most of the requirements of the statute and regulations but some additional evidence is required.

400 MARYLAND AVE., SW, WASHINGTON, DC 20202 http://www.ed.gov/

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The specific list of items required for OPI to submit is enclosed with this letter. A condition will be placed on OPI's Title I, Part A grant award until OPI has met the requirements of its assessment system for the ELP alternate assessment. To satisfy this condition, OPI must submit satisfactory evidence to address the items identified in the enclosed list. OPI must provide to the Department a plan and timeline by which it will submit the additional documentation within 30 days of the receipt of this letter. If adequate progress is not made, the Department may take additional action. Upon submission of the plan, the Department will reach out to OPI to determine a mutually agreeable schedule. Resubmission should occur once all necessary evidence is complete (rather than in multiple submissions).

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: ESEA.Assessment@ed.gov.

Sincerely,

/s/

Ian Rosenblum
Deputy Assistant Secretary for Policy and Programs
Delegated the Authority to Perform the
Functions and Duties of the Assistant Secretary

Enclosures

cc: Ashley McGrath, State Assessment Director

Critical Elements that Require Additional Evidence for Montana' Assessment System

Critical element	Additional Evidence Needed			
1.2 – Coherent and	For the State's English language proficiency (ELP) standards:			
Rigorous	• Evidence that the State's ELP standards align to the State's academic			
Academic Content	content standards (e.g., evidence of alignment studies conducted between			
Standards	the State's current reading/language arts (R/LA), mathematics, and science			
	standards and WIDA's ELP standards).			
1.2 D	• Evidence of a plan to address any issues identified in the alignment studies.			
1.3 – Required Assessments	 For the Alternate ACCESS: Evidence that the State's assessment system includes an annual alternate ELP assessment aligned with State ELP standards (e.g., evidence that the State has implemented Alternate ACCESS for kindergarten once it becomes available). 			
Assessments				
1.4 – Policies for	For the Alternate ACCESS:			
Including All	• As noted in critical element 1.3, evidence that the State's assessment			
Students in	system includes an annual alternate ELP assessment for kindergarten			
Assessments	aligned with State ELP standards.			
2.1 – Test Design	For the ACCESS and Alternate ACCESS:			
and Development	• Evidence of test blueprints that describe the structure of each assessment in			
	sufficient detail to support the development of assessments that measure			
	the depth and breadth of the State's ELP standards, and reflect appropriate			
	inclusion of the range of complexity found in the standards, specifically:			
	 Evidence that the test blueprints include the number of items for each standard and subdomain. Evidence of a description of the item selection process for paper test 			
2.2 T4	forms that adheres to the test blueprints. For the ACCESS:			
2.2 – Item				
Development	• Evidence that the State uses reasonable and technically sound procedures to develop and select items to assess student ELP based on the State's ELP			
	standards in terms of content and language processes (e.g., documentation			
	on the qualifications of item reviewers such as their grade levels taught,			
	years of experience, and demographic diversity).			
	jears of experience, and demographic diversity).			
	For the Alternate ACCESS:			
	Evidence that the State uses reasonable and technically sound procedures			
	to develop and select items to assess student ELP based on the State's			
	alternate ELP standards in terms of content and language processes (e.g.,			
	evidence that the item development process includes experts with			
	knowledge of English learner or ELs with significant cognitive disabilities			
	and their grade levels taught, years of experience, and demographic			
2.2 FF 4	diversity).			
2.3 – Test	For the ACCESS and Alternate ACCES:			
Administration	• Evidence that the State 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, including, as necessary, alternate assessments, and know how to make use of			
	necessary, anemate assessments, and know now to make use or			

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Critical element	Additional Evidence Needed
	appropriate accommodations during assessments for all students with disabilities (e.g., evidence that appropriate staff have completed test administrator training such as with attendance sheets, completion certificates, or assurance forms).
	 For the ACCESS: Evidence that the State has established contingency plans to address possible technology challenges during test administration (e.g., evidence of contingency plans that address issues outside of the vendor such as with a power outage).
2.5 – Test Security	 For the ACCESS and Alternate ACCESS: Evidence that the State has implemented and documented an appropriate set of policies and procedures to prevent test irregularities and ensure the integrity of test results (e.g., evidence of how WIDA works with member States on follow-up investigations and how information is communicated to States including a plan to address the test security vendor's findings).
3.1 – Overall Validity, including Validity Based on Content	 For the ACCESS: Evidence that the State's assessment measures the knowledge and skills specified in the State's ELP standards (e.g., evidence of a plan to address any issues identified in the planned alignment and correspondence studies).
2.2	 For the Alternate ACCESS: Evidence that the State's assessment measures the knowledge and skills specified in the State's alternate ELP standards (e.g., evidence of a plan to address the issues identified in the alignment and linking studies). For the ACCESS and Alternate ACCESS:
3.2 – Validity Based on Cognitive Processes	 Documentation of adequate validity evidence that the State's assessments tap the intended language processes appropriate for each gradelevel/grade-band as represented in the State's ELP standards, specifically: Evidence that items are reviewed based on the linguistic complexity of the vocabulary, graphics, and other content features of the items. Evidence that the panel reviewing the items include language development experts. Evidence that the State documents the reviewers' judgments of the language processes being demonstrated by the items.
3.4 – Validity Based on Relationships with Other Variables	 For the Alternate ACCESS: Documentation of adequate validity evidence that the State's assessment scores are related as expected with other variables.
4.1 – Reliability	For the ACCESS and Alternate ACCESS: • Documentation of adequate reliability for the State's assessments consistent with nationally recognized professional and technical testing standards, specifically: • Evidence of a plan to improve the consistency and accuracy of the assessments since the values are low in some cases (e.g., ACCESS listening domain grade one levels 2-5).

Critical element	Additional Evidence Needed	
	 Evidence of a plan to address the precision of the test forms in speaking and writing across all proficiency levels which could eliminate the almost bimodal nature of the test information function (TIF) curves. 	
	 For the ACCESS: Documentation of adequate reliability for the State's assessments consistent with nationally recognized professional and technical testing standards (e.g., evidence that the new folders of items and tasks developed as a result of the annual refreshment plan have been included in the item bank). 	
	 For the Alternate ACCESS: Documentation of adequate reliability for the State's assessments consistent with nationally recognized professional and technical testing standards (e.g., evidence of TIF for the overall assessment). 	
4.2 – Fairness and Accessibility	 For the ACCESS and Alternate ACCESS: Evidence that the State has taken reasonable and appropriate steps to ensure that its assessments are accessible to all ELs and fair across student groups, including ELs with disabilities, in their design, development, and analysis (e.g., evidence of completed differential item functioning or DIF analyses based on disability status; and for Alternate ACCESS, evidence of the role that universal design plays in the design, development, and analysis stages). 	
4.3 – Full Performance Continuum	 For the ACCESS and Alternate ACCESS: Evidence that the ELP assessments provide an adequately precise estimate of student performance across the full performance continuum including performance for ELs with high and low levels of ELP and with different proficiency profiles across the domains of speaking, listening, reading, and writing. Evidence requested for critical element 4.1 (Reliability) will also satisfy this critical element. 	
4.4 – Scoring	For the ACCESS and Alternate ACCESS: • Evidence that the State has established and documented standardized scoring procedures and protocols for its ELP assessments that are designed to produce reliable and meaningful results, facilitate valid score interpretations, and report assessment results in terms of the State's ELP standards, specifically: • Evidence that if an EL has a disability that precludes assessment of the student in one or more of the required domains/components because there are no appropriate accommodations for the affected domain(s)/component(s), the State ensures that the student is assessed in the remaining domain(s)/component(s) in which it is possible to assess the student, including a description of how this will occur. • Evidence that the State has adopted a method to calculate a student's composite score in cases where the student does not take each of the required domains including a rationale for the scoring procedure (e.g., evidence that the State has adopted one of the four WIDA models).	

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Critical element	Additional Evidence Needed		
	o Evidence of the State's scoring procedures and protocols, including		
	how paper test forms of the speaking test are scored and monitored.		
4.5 – Multiple	For the ACCESS:		
Assessment Forms	 Evidence that the State ensures that all forms of the assessment adequately represent the State's ELP standards and yield consistent score interpretations such that the forms are comparable within and across settings, specifically: Evidence of an equating plan for the paper test forms of the listening and reading tests. Evidence of a rationale for using anchor item sets for the reading tests. 		
	For the Alternate ACCESS:		
	• Evidence that the State ensures that all forms of the assessment adequately represent the State's alternate ELP standards and yield consistent score interpretations such that the forms are comparable within and across settings (e.g., evidence of a plan for equating the new test forms).		
4.7 – Technical	For the ACCESS and Alternate ACCES:		
Analysis and	• Evidence of adequate technical quality is made public, including on the		
Ongoing	State's website (e.g., evidence that the technical manuals are posted on the		
Maintenance	State's website).		
5.3 – Accommodations	 For the Alternate ACCESS: Evidence that the State has a system for monitoring, maintaining, and improving, as needed, the quality of its assessment system. For the ACCESS and Alternate ACCESS: Documentation that the State makes available appropriate accommodations and ensures that its assessments are accessible to students with disabilities and ELs, including ELs with disabilities (e.g., evidence of completed work products or research studies to demonstrate that the provided accommodations are appropriate and effective for meeting the individual student's need(s) to participate in the assessments, do not alter the construct being assessed, and 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). 		
5.4 – Monitoring	For the ACCESS and Alternate ACCESS:		
Test Administration for Special Populations	• Evidence that the State monitors test administration in its districts and schools to ensure that appropriate assessments, with or without accommodations, are selected for ELs with disabilities so that they are appropriately included in the ELP assessments (e.g., documentation of monitoring results for the most recent year of test administration in the State, and evidence of any actions taken based on the findings).		
6.1 – State	For the Alternate ACCESS:		
Adoption of Academic Achievement	• Evidence that if the State has developed alternate ELP achievement standards, it has adopted them only for ELs who are students with the most significant cognitive disabilities who cannot participate in the regular ELP assessment even with appropriate accommodations (e.g., evidence that the		

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Critical element	Additional Evidence Needed	
Standards for All Students	State has formally adopted WIDA's alternate ELP achievement standards such as with board approval).	
6.2 – Achievement Standards-Setting	 For the Alternate ACCESS: Evidence that the State used a technically sound method and process for setting ELP standards, such that cut scores are developed for every grade-level/grade-band, content domain/language domain, and/or composite for which proficient-level scores are reported (e.g., evidence of the reliability of the cut scores and the validity of recommended interpretations since the same cut scores are used for all grade-level clusters). 	
6.3 – Challenging and Aligned Academic Achievement Standards	 For the ACCESS and Alternate ACCESS: Evidence that the State has ensured that ELP assessment results are expressed in terms that are clearly aligned with the State's ELP standards and its ELP performance-level descriptors (e.g., evidence of a clear description of the process used to develop the State's ELP achievement standards so that it is clear, for example, that the State's cut scores were set and performance level descriptors written to reflect the depth and breadth of the State's ELP standards for each grade-level and grade-band). 	
6.4 – Reporting	For the Alternate ACCESS: • Evidence that the State reports an EL student's English proficiency in terms of the State's grade level/grade-band ELP standards including performance level descriptors (e.g., evidence that the individual student report or ISR includes performance level descriptors).	

U. S. Department of Education Peer Review of State Assessment Systems

January-March 2021 State ELP Assessment Peer Review Notes

WIDA ACCESS for ELLs 2.0 and Alternate ACCESS for ELLs



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

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

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

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SECTION 1: STATEWIDE SYSTEM OF STANDARDS AND ASSESSMENTS

Critical Element 1.1 – State Adoption of ELP Standards for All English Learners

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
For English language proficiency (ELP) standards: The State formally adopted K-12 ELP standards for all ELs in public schools in the State.	ACCESS for ELLs and Alternate ACCESS for ELLs All evidence submitted for Critical Element 1.1 pertains to both ACCESS for ELLs and Alternate ACCESS for ELLs.	Document 1.1.d ARM Notice of Adoption.pdf provides evidence of the adoption of the 5 ELP standards and performance level descriptors for entering, emerging, developing, expanding, bridging, and reaching levels, effective 9/23/2011.
	Evidence Provided by WIDA in Consortium-Level Submission: (WIDA did not provide evidence in response to Critical Element 1.1; however, this document was provided as part of the Consortium's evidence packet in support of other Critical Elements.) 1.1.a_WIDA - 2012 WIDA ELD Standards.pdf Page 4 (pdf p. 8), Figure B	Document 1.1.b_MontELP – OPI MOU WIDA.pdf provides evidence of ACCESS and Alternate ACCESS as the assessments to be used to meet Title I and III requirements in Montana. Document 1.1.k_MontELP – English Learner Guidance for School Districts.pdf provides evidence that the State communicates the requirement to assess all ELs annually for ELP.
	Evidence Specific to Montana ELP Submission: 1.1.b_MontELP - OPI MOU WIDA.pdf Binding agreement between the Montana Office of Public Instruction (OPI) and the University of Wisconsin-Madison's Center for Education Research for the state's participation in the WIDA Consortium. Page 1 - States that Montana has adopted ACCESS for ELLs (aligned to WIDA's English language proficiency standards) for its plan to meet Title I and III requirements. 1.1.c_MontELP - Notice of Public Hearing on Proposed Adoption.pdf	The State's ESSA plan (1.1.j) indicates adoption of ELP standards in 2011. However, 1.1.a indicates WIDA modified ELD standards in 2012. Although the State's evidence supports that the State is using the newer 2012 WIDA ELD standards and did modify entrance and exit requirements, the peers could not find formal adoption of the newer 2012 standards.

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
-	reference)	State Documentation or Evidence
	 Describes proceedings of the public hearing 	
	preceding adoption of Montana's K-12	
	ELP standards.	
	• 1.1.d_MontELP – ARM Notice of Adoption.pdf	
	 Documents Notice of Adoption after 	
	required period of public comment.	
	• 1.1.e_MontELP – Administrative Rule 10.53 -	
	ELP Content Standards.pdf	
	 Shows Montana's formally adopted ELP 	
	standards corresponding to the 2012	
	amplification of the WIDA ELD standards.	
	• 1.1.f_MontELP - WIDA_MT_ELD Standards	
	Crosswalk.pdf	
	 Shows the location of each WIDA ELD 	
	Standard within Montana's Administrative	
	Rules.	
	• 1.1.g_MontELP - Board of Public Education	
	Powers and Duties.pdf	
	o Montana Code Annotated 2019, Title 20,	
	Chapter 2, Part 1 – Section 11 – States the	
	Montana Board of Public Education shall	
	adopt rules for student assessment in the	
	public schools.	
	• 1.1.h_MontELP – Supervision of Schools Powers	
	and Duties.pdf	
	o Montana Code Annotated 2019, Title 20,	
	Chapter 3, Part 1 – Section 27 – States the	
	Superintendent of Public Instruction shall	
	provide schools with information and	
	technical assistance for compliance with the	
	student assessment rules.	
	• 1.1.i_MontELP – Administrative Rule 10.55.603	
	- Standards of Accreditation.pdf	
	 Section 603 describes LEA responsibility to 	
	ensure curriculum is aligned to all content	
	standards, and states schools must assess all	

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
	students toward achieving content standards. 1.1.j_MontELP – ESSA Plan.pdf Page 12 – Identifies 2011 as adoption date for ELP standards. Pages 23-24 – Describes WIDA ELD standards and assessments as means by which the state measures progress in achieving English language proficiency as part of its accountability program. 1.1.k_MontELP – English Learner Guidance for School Districts.pdf Page 10 – Identifies Montana's ELP Standards as the WIDA ELD Standards and WIDA Proficiency Level Definitions and points to Montana Administrative Rules approving the state's ELP standards. Page 19 – States, Montana has adopted the WIDA English language development standards" Page 24 – Articulates that all identified ELs must participate in WIDA assessments. 1.1.l_MontELP – ELP Testing Requirements Screenshot.pdf Screenshot from Montana OPI's webpage clearly communicating all identified English learners must be assessed annually using WIDA ACCESS (or Alternate ACCESS) until they reach proficiency as defined by Montana's adopted content and performance standards.	
Section 1.1 Summary Statement		
No additional evidence is required or		
X The following additional evidence is r	needed/provide brief rationale:	

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
Evidence the State formally adopted the newer 2012 WIDA K-12 ELP standards.		

Critical Element 1.2 – Coherent and Progressive ELP Standards that Correspond to the State's Academic Content Standards

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
Critical Element For ELP standards: The ELP standards: • are derived from the four domains of speaking, listening, reading, and writing; • address the different proficiency levels of ELs; and align to the State academic content standards (see definition¹). The ELP standards must contain language proficiency expectations that reflect the language needed for ELs to acquire and demonstrate their achievement of the knowledge and skills identified in the State's academic content standards	Evidence (Record document and page # for future reference) ACCESS for ELLS Derived from four domains of speaking, listening, reading, and writing: Evidence Provided by WIDA in Consortium-Level Submission: 1.1.a_WIDA - 2012 WIDA ELD Standards.pdf Page 9 (pdf p. 13) - Identifies the four domains within the ELD Standards (listening, speaking, reading, and writing) Evidence Specific to Montana ELP Submission:	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence ACCESS: Document 1.1.a provides evidence that the ELP standards are derived from the four domains of speaking, listening, reading, and writing and address the different proficiency levels of ELs. Document 1.1.k describes the different EL proficiency levels. The State adopted both the Common Core State Standards in ELA and math and the NGSS in science. The State makes the case that because WIDA ELD standards are connected to CCSS and NGSS, this satisfies alignment to the State academic content standards. The State conducted
appropriate to each grade-level/grade- band in at least reading/language arts, mathematics, and science.	1.1.k_MontELP - English Learner Guidance for School Districts.pdf Page 13 - States that proficiency levels indicate a student would be capable enough in all language domains: speaking, listening, writing, and reading, to be able to benefit fully from mainstream classroom instruction. Different proficiency levels of ELs:	standards validation to further demonstrate alignment. Document 1.2.a provides evidence of the alignment between the ELP standards and the common core State Standards in ELA and mathematics. (WIDA's 2012 Amplification of the ELD Standards were developed to address alignment gaps identified in 2007.) In addition, however, Document 1.2.c_MontELP – IMS Global Crosswalk shows the alignment between the Wisconsin Standards and the Montana Standards, but it is not clear to peers what the relationship is between the

¹ see page 24 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

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
	■ 1.1.k_MontELP - English Learner Guidance for School Districts.pdf ○ Page 14 - Illustrates levels of English language proficiency. ○ Appendix D - Provides detailed description of English language proficiency levels. Alignment to State academic content standards: Evidence Provided by WIDA in	CCSS and the Wisconsin standards. The alignment between IMS Global Network's CASE repository and the CCSS is not established in the pdf, nor in the explanation for why Wisconsin/Montana alignment constitutes as substantive CCSS/Montana alignment. Paragraph 2 on page 5 of the State's Peer Review submission document requires a chain of inferences that are not clearly supported—namely, that Wisconsin certified standards are the same as CCSS, WIDA ELD standards are aligned with CCSS, therefore Montana academic content standards are aligned
	Consortium-Level Submission: 1.2a_WIDA - WIDA Common Core Alignment Study - 2007.pdf Pages 38-39 (pdf pp. 45-46) - Summary of results and recommendations. 1.2b_WIDA - K-12 English Language Development Standards Validation 2016.pdf	to CCSS except for specific cultural connections to Native Americans. Additional evidence is needed that the ELP standards align to the State academic content standards. Document 1.1.a_WIDA ELD Standards.pdf provides some examples of connections between the ELD standards and
	 White paper discussing validity of the WIDA ELD Standards as related to supporting student achievement of knowledge and skills reflected in the content standards. 	their correspondence with NGSS. However, the documents provided do not indicate a comprehensive alignment with the science standards. Peers noted that pages 22-29 of 1.2.d MontELP-WIDA
	 1.1.a_WIDA - 2012 WIDA ELD Standards.pdf Pages 10-11 (pdf pp. 14-15) - Discusses content connections derived from state and national content standards within Model Performance Indicators. Pages 16-19 (pdf pp. 20-23) - Illustrates specific CCSS and NGSS connections to WIDA strands. 	Standards Validation Workshop Briefing Book.pdf demonstrate that former-EL students are significantly below never-EL population. Peers would expect former-ELs to perform at commensurate or higher level on content assessment, relative to never ELs, if aligned and preparing students to acquire and demonstrate their achievement of the knowledge and skills identified in the Montana's academic content standards.
	Evidence Specific to Montana ELP Submission: 1.1.j_MontELP – ESSA Plan.pdf	Alternate ACCESS: Similar to the ACCESS, the evidence the state has submitted for the Alternate ACCESS does not clearly

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	,	
	Pages 74-75 – Provides a high-level overview of the standards validation process aligning Montana's content expectations with WIDA's ELD Standards. States, "In order to ensure that academic English language proficiency expectations aligned to the updated WIDA standards and the new Montana content standards, in August 2019, the OPI convened stakeholders to review the exit criteria for Montana ELs." (Language reflects result of amendment process described in 1.2.d, 1.2.e, and 1.2.f.) 1.2.c_MontELP - IMS Global Crosswalk.pdf Shows connection between Montana's ELA and mathematics content standards and CCSS. 1.2.d_MontELP - WIDA Standards Validation Workshop Briefing Book.pdf Provides documentation of Montana's process for connecting the state's academic expectations in ELA, mathematics, and science, with WIDA ACCESS for ELLs performance expectations.	address alignment between the Alternate ACCESS and the content standards for students taking the Alternate Access. However, the State included performance criteria for students taking the Alternate ACCESS as part of the validation workshop.
	• 1.2.e_MontELP - WIDA Standards Validation	
	Workshop Process Report.pdf Provides documentation of Montana's process for connecting the state's academic expectations in ELA, mathematics, and science, with WIDA ACCESS for ELLs performance expectations. 1.2.f_MontELP - Committee Process for	
	 Considering Changes to ELP Criteria.pdf Documents Montana's formal process for approving state-specific EL performance 	

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
	criteria (including involvement of state	
	leaders and stakeholder groups).	
	• 1.2.g_MontELP – ESSA Plan Redline	
	Amendment	
	 Pages 74-76 – Articulates additional steps 	
	for approving Montana's proficiency	
	criteria for ELs consistent with the state's	
	content expectations.	
	• 1.2.h_MontELP – BPE Agenda Packet – 11-07-	
	2019.pdf	
	 Documents Board of Public Education 	
	involvement in updating EL proficiency	
	criteria, along with timeline for presentation	
	to USED for approval.	
	• 1.2.i_MontELP – ESSA Amendment Approval	
	Letter.pdf	
	 Documents USED approval of revision to 	
	language within Montana's ESSA plan.	
	Alternate ACCESS for ELLs	
	Like ACCESS for ELLs, the Alternate ACCESS is	
	based on the same content standards derived from the	
	four domains of speaking, listening, reading, and	
	writing. Montana has identified specific performance	
	standards connected to the content standards for students	
	taking the Alternate ACCESS.	
	• 1.2.e_MontELP – Standards Validation	
	Workshop Process Report.pdf	
	o Page 6 – Documents inclusion of	
	performance expectations for students	
	taking Alternate ACCESS in Montana's	
	standards validation workshop.	
	• 1.1.k MontELP – English Learner Guidance	
	for School Districts.pdf	

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	 Pages 26-27 – Discusses performance criteria for students taking Alternate ACCESS. 	

Section 1.2 Summary Statement

No additional evidence is required or

- __X_ The following additional evidence is needed/provide brief rationale:
 - Evidence that the ELP standards are aligned to the state's content standards in ELA and math.
 - Evidence of alignment of the ELP standards with the NGSS.

Critical Element 1.3 – Required Assessments

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State's assessment system includes an <i>annual general and alternate ELP assessment</i> (aligned with State ELP standards) administered to: • All ELs in grades K-12.	Reviewed by Department Staff Only	WIDA does not currently have a kindergarten version of Alternate ACCESS. The Department awarded Minnesota a Competitive Grant for State Assessments (CGSA) in 2019 to develop a kindergarten version of the WIDA Alternate ACCESS. Montana is participating in this project, which aims to administer a kindergarten alternate ELP assessment in the 2023-2024 school year. The State must provide evidence that it has implemented Alternate ACCESS for kindergarten once the assessment becomes available.

Section 1.3 Summary Statement

No additional evidence is required or

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

For the Alternate ACCESS:

• Evidence that the State's assessment system includes an annual alternate ELP assessment aligned with State ELP standards (e.g., evidence that the State has implemented Alternate ACCESS for kindergarten once it becomes available).

Critical Element 1.4 – Policies for Including All Students in Assessments

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State has policies that require the inclusion of all public elementary and secondary ELs in the State's ELP assessment, including ELs with disabilities.	Reviewed by Department Staff Only	Montana does not yet have an Alternate ACCESS assessment for kindergarten. Therefore, this critical element still applies as well.

Section 1.4 Summary Statement

No additional evidence is required or

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

For the Alternate ACCESS:

• As noted in critical element 1.3, evidence that the State's assessment system includes an annual alternate ELP assessment for kindergarten aligned with State ELP standards.

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
Citical Element	reference)	State Documentation or Evidence
If the State has developed or amended challenging <i>ELP</i> 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 schools leaders (if the State has charter schools), specialized instructional support personnel, paraprofessionals, administrators,	Reviewed by Department Staff Only	The State's ELP standards were adopted in 2011 and therefore this critical element does not apply.
other staff, and parents.		
Section 1.5 Summary Statement		
_X No additional evidence is required or		
The following additional evidence is ne	reded/provide brief rationale:	

SECTION 2: ASSESSMENT SYSTEM OPERATIONS

Critical Element 2.1 – Test Design and Development		
Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Civical Diement	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 <i>the depth and breadth of the State's ELP standards</i> , and includes: • Statement(s) of the purposes of the assessments and the intended	ACCESS for ELLs Statement(s) of purposes of the assessments and intended interpretations and uses of results:	Note: The bulk of the evidence is submitted as part of the WIDA Consortium common submission. See evidence provided by WIDA Consortium Review for components of this CE regarding Blueprints, alignment to ELP standards (ELDs for WIDA) in terms of knowledge and skills and levels of complexity. WIDA Consortium Review should have also covered the CAT considerations.
interpretations and uses of results;Test blueprints that describe the	Evidence Provided by WIDA in Consortium-Level Submission:	ACCESS:
structure of each assessment in sufficient detail to support the development of assessments that are technically sound, measure the depth and breadth of <i>the State's ELP standards</i> , and support the intended interpretations and uses of the results. • Processes to ensure that the ELP assessment is tailored to the knowledge and skills included in <i>the State's ELP standards</i> and reflects appropriate inclusion of the range of complexity found in the standards. • If the State administers computeradaptive assessments, the item pool	(WIDA did not provide this evidence in response to Critical Element 2.1; however, this document was provided as part of the Consortium's evidence packet in support of other Critical Elements.) ■ 2.1a_WIDA − ACCESS for ELLs 2.0 Interpretive Guide for Score Reports.pdf □ Page 3 (pdf p. 5) − Identifies the intended purposes of WIDA ACCESS for ELLs. Evidence Specific to Montana ELP Submission: ■ 1.1.j_MontELP − ESSA Plan.pdf □ Page 23 - Identifies progress measurement	 Document 2.1.a provides a statement of the purpose (pages 3 and 5) and intended interpretations and uses (pages 16 – 18) for ACCESS. The State provided a copy of the interpretive guide for score reports from WIDA, which identifies the intended purposes of the WIDA ACCESS. Interpretation of results is provided in terms of the language proficiency levels. The ESSA Plan indicates use for meeting federal requirements and the State's specific statement of purpose for the WIDA assessments in Montana. The State's Standards Validation Workshop Process Report supports alignment to the State's ELP standards.
 and item selection procedures adequately support the test design and intended uses and interpretations of results. If the State administers a computer-adaptive assessment, it makes proficiency determinations with respect to the grade in which the 	within Montana's accountability system as a specific purpose of WIDA assessments – "WIDA ACCESS 2.0 data will be used to compare the current year to the previous year for a progress measurement." • Page 74-75 – Specifically states, "Montana has developed standardized, statewide entrance procedures for the accurate and timely identification of all English learners	 Alternate ACCESS: Document 2.1.b provides information for Alternate ACCESS on purpose (page 3) and intended uses (pages 8 and 11). The State provided a copy of the interpretive guide for Alternate ACCESS from WIDA, which identifies the intended purposes of the Alternate ACCESS.

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.

(ELs)." Further indicates WIDA assessments are used for this purpose in Montana.

• 1.2.e_MontELP – Standards Validation Workshop Process Report.pdf

- Pages 2-5 Explains the purpose of the WIDA assessments and discusses the context of the assessments in Montana.
- 1.1.k_MontELP English Learner Guidance for School Districts.pdf
 - Page 23-25 Discusses Montana's use of WIDA assessments in order to assess the EL student population. (See FAQ "Why does the OPI administer...ACCESS for ELLs assessments?"). Addresses how data will be used for accountability, and how the OPI recommends LEAs use data as part of a feedback loop to inform the instructional process.
 - Appendix D Provides English language proficiency levels as defined by WIDA for Montana.

Alternate ACCESS for ELLs

Statement(s) of purposes of the assessments and intended interpretations and uses of results:

Evidence Provided by WIDA in Consortium-Level Submission:

(WIDA did not provide this evidence in response to Critical Element 2.1; however, this document was provided as part of the Consortium's evidence packet in support of other Critical Elements.)

• 2.1.b – WIDA – Alternate ACCESS for ELLs Interpretive Guide for Score Reports.pdf

 Page 3 (pdf p. 5) – Identifies the purpose of Alternate ACCESS.

Evidence Specific to Montana ELP Submission:

- 1.2.i_MontELP ESSA Plan.pdf (should be 1.1.j)
 - Page 75 Includes proficiency criteria for Alternate ACCESS.
- 1.2.e_MontELP Standards Validation Workshop Process Report.pdf
 - Pages 2-5 Explains the purpose of the WIDA assessments and discusses the context of the assessments in Montana.
- 1.1.k_MontELP English Learner Guidance for School Districts.pdf
 - Page 23-25 Discusses Montana's use of WIDA in order to assess the EL student population. (See FAQ "Why does the OPI administer...ACESS for ELLs assessments?"). Addresses how data (including data from Alternate ACCESS for ELLs will be used for accountability, and how OPI recommends LEAs use data as part of a feedback loop to inform the instructional process.

Section 2.1 Summary Statement

X_ No additional evidence is required or

The following additional evidence is needed/provide brief rationale:

• [list additional evidence needed w/brief rationale]

<u>Critical Element 2.2 – Item Development</u>

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State uses reasonable and technically sound procedures to develop and select items to: • Assess student English language proficiency based on the <i>State's</i> **ELP standards* in terms of content and language processes.	No State-specific evidence. Refer to evidence submitted as part of WIDA Consortium common submission.	Evidence in support of this critical element has been submitted by the WIDA Consortium on behalf of all Consortium members. The State did not submit any additional evidence for this Critical Element.
Section 2.2 Summary Statement		
No additional evidence is required or The following additional evidence is ne	reded/provide brief rationale:	

Critical Element 2.3 – Test Administration

Chilcal Element 2.5 – Test Admini	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
The State implements policies and procedures for standardized test administration; specifically, the State: • Has established and communicates to educators clear, thorough and consistent standardized procedures for the administration of its assessments, including administration	Standardized administration procedures for ACCESS for ELLs and Alternate ACCESS for ELLs have been submitted by WIDA on behalf of Consortium members. Montana is submitting supplemental evidence that administration adheres to WIDA's standard administration procedures. ACCESS for ELLs	For ACCESS and Alternate ACCESS: The State indicates that standardized administration procedures for ACCESS and Alternate ACCESS for have been submitted by WIDA on behalf of Consortium members. Montana has submitted supplemental evidence that administration adheres to WIDA's standard administration procedures.
 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. 	Standardized administration procedures, including administration with accommodations: • 2.3.a_MontELP - Testing Windows.pdf • Posted on the Montana Comprehensive Assessment System site, the State provides an up-to-date list of all statewide assessments and testing windows, including WIDA assessments. • 2.3.b_MontELP - WIDA MT ACCESS Checklist.pdf • Includes links to all WIDA ACCESS for ELLs administration materials. • 1.3.f_MontELP - WIDA District and School Test Coordinator Manual.pdf • Page 53-66 (pdf pp. 55-68) - Outlines the roles and responsibilities of the Test Coordinator before and during test administration. • 1.3.g_MontELP - WIDA Test Administration Manual, 2018-2019.pdf • Section 4 - Provides standardized test administration instructions for the Kindergarten ACCESS for ELLs	State specific evidence includes communications to educators, test administration manuals, webinars, training certification modules, and guidance on making use of appropriate accommodations during assessments for students with disabilities. Clear, thorough and consistent standardized procedures are provided by Montana and WIDA. Training requirements are clearly communicated. Assigning accommodations tutorial included as part of training. WIDA accessibility and accommodations supplement is included. Although the State's evidence shows various training resources and procedures for both ACCESS and Alternate ACCESS, the State should provide evidence that all general and special education teachers, paraprofessionals, teachers of ELs, specialized instructional support personnel, and other appropriate staff have completed test administration training such as with attendance sheets, completion certificates, or assurance forms. Additional evidence that training certifications have been completed, by how many educators, for most recent year of testing to answer the question, "To what extent do individuals complete the requirements to be certified as TA, STC, DTC, etc.?" to

- Sections 5 and 6 Provides standardized test administration instructions for paper and online ACCESS for ELLs for grades 1-12.
- o Page 17 (pdf p. 19) Discusses accessibility and accommodations.
- o Page 73 (pdf p. 75) Discusses accommodations for paper administration.
- Page 101 (pdf p. 103) Discusses accommodations for online administration.

2.3.c_MontELP - ACCESS for ELLs Webinar 2.pdf

 High-level overview of ACCESS for ELLs and Alternate ACCESS, administration and training requirements.

• 2.3.d_MontELP - WIDA SEA Communications.pdf

 Overview and example of "WIDA Wednesday" communications with SEAs for distribution to LEAs.

• 1.4.b_MontELP – Statewide Assessments Accessibility Resources Page.pdf

 Screenshot shows guidance Montana provides LEAs in accessing WIDA documentation for accessibility and accommodations—both ACCESS for ELLs and Alternate ACCESS.

• 2.3.e_MontELP – EL Identification During Closures.pdf

 Provides LEAs guidance to maintain standardized identification and administration procedures during long-term school closures.

• 2.3.f_MontELP – WIDA Accessibility and Accommodations Supplement.pdf

 Provides specific information regarding the WIDA accessibility framework and establish that the State ensures appropriate staff receive training.

For ACCESS

Evidence supports that the State has defined technology and other related requirements for the DRC INSIGHT System, such as Critical incident protocols for WIDA/DRC are provided in 2.5.3, but it is not clear whether the State has and communicates contingency plans to LEAs for challenges that may occur that are not at the WIDA/DRC levels. Therefore, the State should provide a contingency plan to address possible technology challenges during test administration.

For Alternate ACCESS:

Document 2.3.a provides testing window for ACCESS for ELs but does not include Alternate ACCESS—even though other alternate assessments are listed (alternate science and MSAA).

standardized administration of ACCESS for ELLs with accommodations. Administrator Training: • 2.3.g_MontELP – Training Certification Requirements.pdf o Screenshot of Montana's WIDA page showing training certification requirements. 2.3.h MontELP – STC Corner ACCESS for **ELLs Page.pdf** o Communicates administration, training and certification responsibilities for WIDA assessments to STCs. 2.3.b MontELP – WIDA MT ACCESS Checklist.pdf o Page 3 – Includes links to training tutorial, Accessibility Overview tutorial, and Assigning Accommodations tutorial. o Page 5 – Includes link to the "Administering the Test" tutorial. Page 6 – Includes link to certification quiz. 1.4.d_MontELP - ACCESS for ELLs Training Webinar.pdf o Training ensures standardized identification and enrollment of ELs for ACCESS for ELLs administration. Technology Requirements: • 2.3.i MontELP – DRC INSIGHT System Requirements.pdf o WIDA's technology requirements provided to technology coordinators. 2.3.j MontELP - Technology Readiness Checklist.pdf o Guidance for technology coordinators to prepare for ACCESS for ELLs

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.

administration.

Alternate ACCESS for ELLs

(Note: All general EL assessment and training information presented in the above evidence applies to both ACCESS for ELLs and Alternate ACCESS. Evidence specific to Alternate ACCESS is presented below.)

Standardized administration procedures, including administration with accommodations:

- 1.3.f_MontELP WIDA District and School Test Coordinator Manual.pdf
 - Page 53-66 (pdf pp. 55-68) Outlines the roles and responsibilities of the Test Coordinator before and during test administration. (Manual applies to both ACCESS for ELLs and Alternate ACCESS.)
- 1.3.g_MontELP WIDA Test Administration Manual, 2018-2019.pdf
 - Section 7 Provides standardized test administration instructions for Alternate ACCESS.
- 2.3.f_MontELP WIDA Accessibility and Accommodations Supplement.pdf
 - Provides specific information regarding the WIDA accessibility framework and standardized administration of Alternate ACCESS with accommodations. (Manual applies to both ACCESS for ELLs and Alternate ACCESS.)

Administrator Training:

- 2.3.b_MontELP WIDA MT ACCESS Checklist.pdf
 - Page 5 Includes link to Alternate ACCESS Test Administration Tutorial.
 - Page 6 Includes link to Alternate ACCESS administration quiz.

	Technology Requirements:	
	Not applicable. Alternate ACCESS is paper-based.	
Section 2.3 Summary Statement		
No additional evidence is required	or	
For ACCESS • A technology contingency plan	to address possible technology challenges during test adminis	tration.

Critical Element 2.4 – Monitoring Test Administration

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State adequately monitors the administration of its State assessments to ensure that standardized test administration procedures are implemented with fidelity across districts and schools. Monitoring of test administration should be demonstrated for all assessments in the State system: the general ELP assessments and the AELPA.	Reviewed by Department Staff Only	Department staff determined that the State's evidence is sufficient for this critical element.
Section 2.4 Summary Statement		
$_{\rm X}$ No additional evidence is required or		
The following additional evidence is ne	eded/provide brief rationale:	

Critical Element 2.5 - Test Security

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State has implemented and documented an appropriate set of policies and procedures to prevent test irregularities and ensure the integrity of	Evidence Provided by WIDA in Consortium-Level Submission: 2.5.a_WIDA - 2018-2019 Test Policy Handbook for State Education Agencies.pdf	For ACCESS and Alternate Access: Test preparation and administration procedures are communicated.
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	 Defines general security policies for states participating in the WIDA Consortium. ACCESS for ELLs and Alternate ACCESS for ELLs 	 The State has included a three-year plan to improve test security. The State has a test security collection schedule and a test security webpage. LEAs must affirm compliance test security policies. Evidence of signed test security agreements—2.4.a
	Evidence Specific to Montana ELP Submission: Test Security procedures for both the WIDA ACCESS for ELLs and Alternate ACCESS are the same.	 (page 11). The State has numerous procedures in place for preventing, detecting, remediating, and investigating test irregularities, include an online test incident report feature where students, parents, staff and community members can share concerns directly with the State.
 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; 	Evidence offered here applies universally across both assessments. Prevention of assessment irregularities 2.5.b_MontELP - FY20_Year 1_2_3_Test Security Plan.pdf	The State's evidence shows various training regarding test security for both ACCESS and Alternate ACCESS. The State's submission also indicates that the State is able to confirm LEA documentation of training activities by requesting evidence of Training Logs during Title Monitoring Common Compliance.
 Investigation of alleged or factual test irregularities. Application of test security procedures to the general ELP assessments and the AELPA. 	 Overviews Montana's 3-year plan to improve test security procedures. 1.3.g_MontELP - WIDA Test Administration Manual, 2018-2019.pdf Page 11 (pdf p. 13) – Shows who should be contacted in case of a security breach. Page 13 (pdf p. 15) – Points out the DTC's responsibility for test security. 	 However, the State should provide some completed examples of this documentation. The peers were looking for 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. Otherwise, the State has provided sufficient evidence
	 Page 16 (pdf p. 18) – Instructs the DTC to submit a test security agreement. Page 18 (pdf p. 20) – Provides guidance to DTCs regarding test security. 	of policies and procedures regarding how the State prevents, detects, and remediates assessment irregularities and provides test security training.

• 1.3.f_MontELP – WIDA District and School Test Coordinator Manual.pdf

- o Pages 10-11 (pdf pp. 12-13) Discusses test security.
- Page 12 (pdf p. 14) Emphasizes the role of test administrators in monitoring during administration.
- Section 3 Discusses materials inventory and describes secure test materials.

• 2.5.c_MontELP – Administrative Rule 10.56 - Test Security.pdf

- Establishes the State's responsibility to adhere to test security through trained school district employees.
- 1.1.k_MontELP English Learner Guidance for School Districts.pdf
 - Page 20 Establishes Montana Test Coordinators must receive training regarding test security.
- 1.3.d_MontELP Assessment Specialist Job Profile.pdf
 - Page 2, 8 Describes the State's role in assuring test security protocols are created and followed.
- 2.5.d_MontELP Test Security Collection Schedule.pdf
 - Schedule for LEA completion of all test security steps/measures.
- 2.5.e_MontELP WIDA Non-Disclosure Agreement.pdf
 - Agreement that must be signed by all LEA users of the WIDA portal prior to accessing secure materials.
- 2.5.f_MontELP OPI Test Security Webpage.pdf
 - Includes links to all OPI test security policies, resources, and training supports.

Peers had the following additional observations about the documentation provided regarding test security:

- Test security section of WIDA manual is very brief and does not address Montana specific instructions for test security, including who to notify in the case of a security incident or breach. Document 2.5.c_MontELP indicates that security incidents should be reported to OPI, but the WIDA materials say the local test coordinator. There should be a clear chain of reporting and Montana OPI contact information.
- The MontCAS documents include information regarding test security but these provide slightly different information from the WIDA TAM and TCM. A Montana-specific testing manual and test coordinators' manual would be able to address this. It isn't clear whether the training modules provided by WIDA, which require 80% passage to certify, also include the MontCAS test security information.
- There are a number of incidences in the MontCAS test security manual where reference is made primarily to Smarter Balanced Assessments—as if the documents were built for Smarter Balanced and the TIDE system and expanded to the other assessments in MontCAS—attending to the general text that still includes specific mention of TIDE or Smarter Balanced would help make the document less confusing. Additionally, Alternate ACCESS is not explicitly included and should be added as all other assessments are included.
- Document 1.3.g_MontELP page 11 indicates if testing irregularities contact District/School Test Coordinator.
- Documents 2.5.k and 2.5.m_MontELP are the instructions for MontCAS which do not include Alternate ACCESS. This additional test should be added to these documents.
- Document 2.5.d is a very helpful concise listing of resources related to test security as well as the timeline.

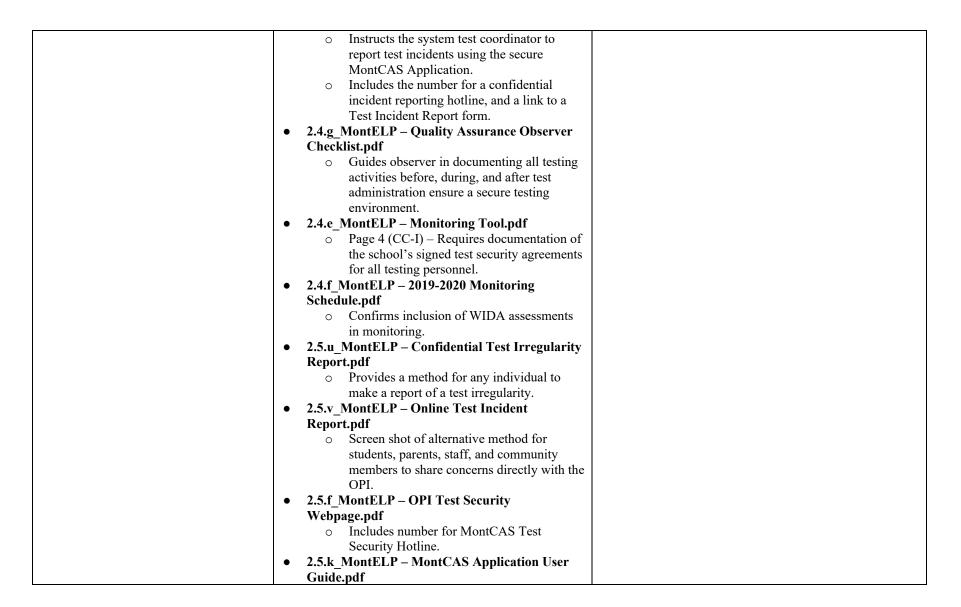
- Includes links to "Roles and Responsibilities" letters for district testing personnel.
- o Includes sample test security plans.
- 2.5.g_MontELP Authorized Representative Test Security Agreement.pdf
 - Charges an Authorized Representative in an LEA (i.e., superintendent) with designating a System Test Coordinator to oversee statewide testing and ensure test security.
- 2.5.h_MontELP STC Test Security Agreement.pdf
 - The agreement ensures all staff have been trained in test security and student privacy.
- 2.5.i_MontELP Test Administrator Test Security Agreement.pdf
 - Agreement ensuring all Test Administrators and other staff handling any component of state tests or accessing information through online reporting systems have been properly trained in test security.
- 2.5.j_MontELP Test Security Agreement for Supporting Roles.pdf
 - Test security agreement for all supporting staff without test delivery accounts.
- 2.5.k_MontELP MontCAS Application User Guide.pdf
 - Page 4 (pdf p. 5) Includes instructions and screenshots for system test coordinator to affirm compliance with guidance defined in the Test Security Manual and the guidance published in the applicable Test Administration Manual.
 - Page 6 (pdf p. 7) Instructs system test coordinators to affirm creation of local test security plans compliant with Montana's Test Security Plan. Includes screenshots from Montana's secure portal.

- Document 2.5.s provides evidence of desktop monitoring for presence of submitted test security and test plan. Peers wonder how these plans are monitored for meeting requirements given the number of districts that needed to be contacted to complete these steps in a short period of time, as well as how OPI knows these plans meet requirements as presented in evidence.
- Peers suggest the State provide cross-tab frequencies of Assessment to incident type or action type as additional information to analyze patterns within and across assessments.

• 2.5.1_MontELP – MontCAS Application Screen

- Screenshot of MontCAS application screen where LEAs affirm compliance with test security policies.
- 2.4.a_MontELP Montana Test Security Manual.pdf
 - Page 6 Lists the State assessments covered under the Test Security Manual.
 - Chapter 2 Discusses the elements of preventing test security and data integrity infractions.
- 2.4.b_MontELP Montana Test Security Portal.pdf
 - Screenshot of Montana's test security training resources and documentation repository.
- 2.5.m_MontELP Montana Test Security Plan.pdf
 - Provides the STC with a checklist of items included in the school system's required Test Security Plan.
- 2.4.i_MontELP MontCAS Test Training Log.pdf
 - Provides LEAs with a means by which to capture who among the staff has received training.
- 2.5.n_MontCAS Assessment Roadshow.pdf
 - o Page 9 Describes Test Security Agreements.
 - Pages 52-92 Describes components of Montana's test security plan, roles and responsibilities of LEA testing personnel, and training requirements.
- 2.5.o_MontELP Assessment Roadshow Proposal.pdf
 - O Documents regional test security training.
- 2.5.p_MontELP Assessment Roadshow Travel Plan.pdf

o Documents regional test security training. 2.5.q MontELP – Assessment Roadshow Attendee List.pdf o Documents that the OPI monitors district training attendance. 2.5.r_MontELP - Title Monitoring - Common Compliance Areas.pdf o Item CC-K – Requests evidence of local assessment training activities. 2.5.s MontELP - FY2020 Test Security Agreement Monitoring and Consequences.pdf o Summarizes the OPI's monitoring to ensure all district testing personnel have signed and submitted Test Security Agreements. 2.4.h MontELP – Ethical Testing Behavior Guidance.pdf Training resource to assist test coordinators and test administrators in facilitating a secure testing environment. Detection of test irregularities • 2.4.a MontELP – Montana Test Security Manual.pdf o Chapter 3 - Details the reporting requirements for test security and the statewide quality assurance analyses conducted for student achievement data. 2.5.c MontELP – Administrative Rule 10.56 -Test Security.pdf o Establishes the State's commitment to reporting test security violations. 2.5.t MontELP – MontCAS Online Reporting System.pdf o Includes instructions for system test coordinators to report testing irregularities 2.5.m_MontELP - Montana Test Security Plan.pdf



Instructs LEA personnel how to report different types of testing incidents via Montana's secure application. 2.5.1 MontELP – MontCAS Application Screen.pdf Screenshot of MontCAS application screen where LEAs report testing incidents. 2.5.w MontELP - MontCAS Test Security **Incident Reporting.pdf** Description of the process by which STCs report testing incidents to the OPI, with screen shots from MontCAS Application. Investigation and remediation following security incidents • 2.4.a MontELP – Montana Test Security Manual.pdf O Chapter 4 - Provides information on the elements of follow-up investigations. Chapter 5 - Describes the recommendations for resolving test security incidents. Chapter 6 – Describes the consequences the OPI will take for failing to adhere to the test security policies and procedures. 2.5.c MontELP – Administrative Rule 10.56 -Test Security.pdf o Discusses consequences for a failure to comply with test security measures. 2.4.e MontELP - Monitoring Tool.pdf o Page 4 (CC-I) – Requires evidence for the previous testing year's incidents and the steps taken to prevent their recurrence. 2.4.0 MontELP - FY2019 WIDA Site Visit **Documentation.pdf** o Provides redacted example of an LEA monitoring documentation from 2019.

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.

2.4.p MontELP - FY2020 WIDA Site Visit

Documentation.pdf

Provides redacted example of an LEA monitoring documentation from 2020. • 2.5.x MontELP - Testing Alert and Score Appeals Process.pdf O Describes the remediation process when a security incident results in the need to reset, reopen, invalidate, grant an extension, or restore a student test. 2.5.y MontELP - Test Incident Tracking Log.pdf Describes methods by which OPI tracks reported testing incidents through investigation and remediation/resolution. 2.5.z MontELP - Testing Incident Tracking Summary.pdf ○ Chapter 1 – Summarizes the incident reporting process and tracking system and overviews reported incidents by school system. O Chapter 2 – Summarizes remediation steps for testing incidents. Table 10 – Shows OPI actions by testing incident. **Alternate ACCESS for ELLs** All processes documented for the ACCESS for ELLs are applicable to the Alternate ACCESS. In addition, a specialist with expertise in IDEA and Special Education completes targeted monitoring of Alternate ACCESS administrations. **Section 2.5 Summary Statement** No additional evidence is required or

• Examples of completed training logs and security agreements.

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

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

For ACCESS and Alternate ACCESS

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
Citical Ekment	reference)	State Documentation or Evidence
The State has policies and procedures in place to protect the integrity and confidentiality of its test materials, test-related data, and personally identifiable information, specifically: 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.	Systems for protecting data integrity and privacy for both the WIDA ACCESS for ELLs and Alternate ACCESS for ELLs are the same. Evidence offered here applies universally across both assessments. ACCESS for ELLs and Alternate ACCESS for ELLs Protect the integrity of test-related data in test administration, storage and use of results • 2.5.b_MontELP - FY20_Year 1_2_3_Test Security Plan.pdf ○ Outlines Montana's comprehensive three-year plan for improving test security toward the goal of protecting the integrity of test administration and results. • 2.4.a_MontELP - Montana Test Security Manual.pdf ○ Guides processes at the LEA and state level to reduce security threats to all statewide assessments. • 2.5.e_MontELP - WIDA Non-Disclosure Agreement.pdf ○ Protects integrity of test-related data in administration and use of results by requiring proper permissioning for all secure portal users. Secure student-level assessment data and protect student privacy and confidentiality • 2.5.g_MontELP - Authorized Representative Test Security Agreement.pdf	 For ACCESS and Alternate Access: The State refers to evidence from WIDA regarding its policies, procedures, and security measures, but it also has provided State-specific evidence. Document 2.5.b outlines the State's plan for improving test security and protecting data integrity. Document 2.6.b provides evidence of the State's data privacy regulations. Evidence provided also includes State Codes regarding use and protection of data, including PII. The State has also provided various test security agreements (2.5.g through 2.5.j) outlining the responsibilities that each role has in maintaining and ensuring data privacy and integrity. Minimum N for confidential data is 5 or fewer except in disability counts (N < 10). Fuzzy suppression is also applied to cells as needed to protect student privacy. The State has provided test security agreements for various roles. Evidence includes State Codes regarding use and protection of data, including PII (e.g., 2.6.a, 2.6.b, 2.6.c, etc.). Peers conclude that the State has provided sufficient evidence to satisfy the requirements regarding policies and procedures to protect the integrity of test-related data in test administration.

steward for managing users within the restricted web-based system for testing and for securing test data. 2.5.h MontELP – STC Test Security Agreement.pdf o Specifically requires the STC to ensure training in student confidentiality and data protection. 2.5.i MontELP – Test Administrator Test Security Agreement.pdf o Acknowledgements 5 and 6 – Specify security of student account/login information and PII. 2.5.j MontELP – Test Security Agreement for **Supporting Roles.pdf** o Includes acknowledgement of security of personally identifiable student information. 2.6.a MontELP – Administrative Rule 10.56 – Reporting.pdf o Administrative Rule of Montana that ensures student assessment data is in compliance with confidentiality requirements of federal and state law. 2.6.b MontELP - Montana Code Annotated 20-7-104.pdf o Outlines student data privacy protections and responsibilities of LEA personnel. 1.1.j MontELP – ESSA Plan.pdf o Pages 112 (pdf p. 116) – Describes Montana's compliance with FERPA in assessment. o Appendix E – Provides Montana's confidentiality policy. 2.6.c_MontELP - MontCAS Data Privacy Policy.pdf o Updated policies and procedures on student data privacy, district guidance, and FERPA requirements.

	 2.6.d_MontELP – Sample Data Sharing 	
	Agreement.pdf	
	 Illustrates a data sharing agreement under 	
	the terms of Montana state statute and OPI	
	policy.	
	• 1.1.b_MontELP – OPI MOU WIDA.pdf	
	 Page 7 – Discusses education record release 	
	and data use.	
	 Schedule C – Education Record Release 	
	and Data Use Agreement – Describes terms	
	of WIDA data use.	
	Protect personally identifiable information	
	about any individual student in reporting:	
	• 1.1.j_MontELP – ESSA Plan.pdf	
	o Page 116 (pdf p. 120)— Defines cell size.	
	 Appendix E – Provides Montana's 	
	confidentiality policy.	
	• 2.6.e_MontELP – PII State Statute.pdf	
	 Defines personally identifiable information 	
	in Montana state statue.	
	• 2.6.c_MontELP – MontCAS Data Privacy	
	Policy.pdf	
	 Specifically discusses PII and provides link 	
	to OPI Student Records Confidentiality	
	Policy.	
S 1: 2 (S S1 1 1		
Section 2.6 Summary Statement		
X_ No additional evidence is required or		
The following additional evidence is no	adad/pravida briaf rationala	
The following additional evidence is ne	<u>*</u>	
• [list additional evidence needed w/l	oriei rationalej	

SECTION 3: TECHNICAL QUALITY - VALIDITY

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

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
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:	No State-specific evidence. Refer to evidence submitted as part of WIDA Consortium common submission.	Evidence in support of this critical element has been submitted by the WIDA Consortium on behalf of all Consortium members. The State did not submit any additional evidence for this Critical Element.
the State's ELP assessments measure the knowledge and skills specified in the State's ELP standards, including: Documentation of adequate alignment between the State's ELP assessment and the ELP standards the assessment is designed to measure in terms of language knowledge and skills, the depth and breadth of the State's ELP standards, across all proficiency levels, domains, and modalities identified therein; Documentation of alignment (as defined) between the State's ELP standards and the language demands implied by, or explicitly stated in, the State's academic content standards; If the State administers an AELPA aligned with alternate ELP achievement standards, the assessment shows adequate linkage to the State's ELP standards in terms of content match (i.e., no unrelated		

determined in test design is appropriate for ELs who are students with the most significant cognitive disabilities.		
Section 3.1 Summary Statement		
No additional evidence is required or		
The following additional evidence is no	eeded/provide brief rationale:	

Critical Element 3.2 – Validity Based on Linguistic Processes

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State has documented adequate validity evidence that its assessments tap <i>the intended language processes</i> appropriate for each grade level/gradeband as represented in the State's ELP standards.	No State-specific evidence. Refer to evidence submitted as part of WIDA Consortium common submission.	Evidence in support of this critical element has been submitted by the WIDA Consortium on behalf of all Consortium members. The State did not submit any additional evidence for this Critical Element.
Section 3.2 Summary Statement		
No additional evidence is required orThe following additional evidence is not flist additional evidence needed wo		

Critical Element 3.3 – Validity Based on Internal Structure

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
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 <i>ELP standards</i> on which the intended interpretations and uses of results are based.	No State-specific evidence. Refer to evidence submitted as part of WIDA Consortium common submission.	Evidence in support of this critical element has been submitted by the WIDA Consortium on behalf of all Consortium members. The State did not submit any additional evidence for this Critical Element.
Section 3.3 Summary Statement		
No additional evidence is required or The following additional evidence is no	eeded/provide brief rationale:	

Critical Element 3.4 – Validity Based on Relations to Other Variables

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State has documented adequate validity evidence that the State's assessment scores are related as expected with other variables.	No State-specific evidence. Refer to evidence submitted as part of WIDA Consortium common submission.	Evidence in support of this critical element has been submitted by the WIDA Consortium on behalf of all Consortium members. The State did not submit any additional evidence for this Critical Element.
Section 3.4 Summary Statement		
No additional evidence is required or The following additional evidence is no	eeded/provide brief rationale:	

SECTION 4: TECHNICAL QUALITY - OTHER

Critical Element 4.1 – Reliability

Chilcal Element 4.1 – Reliability	Friday of (Decord decomposit and new 4.5 of 5-to-	Comments/Notes/Orestinus/Suggestions Description
Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State has documented adequate reliability evidence for its assessments for the following measures of reliability for the State's student population overall and each student group consistent with nationally recognized professional and technical testing standards. If the State's assessments are implemented in multiple States, measures of reliability for the assessment overall and each student group consistent with nationally recognized	Measures of test reliability: Measures of test reliability have been submitted for peer review by WIDA on behalf of Consortium states. Overall and conditional standard error of measurement: Overall and conditional standard errors of measurement have been submitted for peer review by WIDA on behalf of Consortium states.	 The WIDA peer review notes from the current 2021 review indicate that WIDA must provide evidence of test reliability, including: Acceptable consistency and accuracy of estimates in categorical classification decisions for the cut scores, achievement levels or proficiency levels based on the assessment results, or a plan to improve the consistency and accuracy; Evidence that reliability statistics are used to inform ongoing maintenance and development.
professional and technical testing	Consistency and accuracy of estimates in	The State referred to WIDA's review for measures of test
standards, including:	categorical classification decisions for cut	reliability and the overall and conditional standard error of
Test reliability of the State's	scores and proficiency levels based on	measurement. The State provided document 1.2.d
assessments estimated for its student	assessment results:	(Standards Validation Briefing Book) and 1.2.e (Standards
population (for ELP assessments,	Montana is submitting evidence of consistency and	Validation Workshop Process Report) as evidence of
including any domain or component	accuracy of state-specific entrance and exit criteria.	consistency and accuracy of estimates in categorical classification decisions for cut scores and proficiency levels
sub-tests, as applicable);	• 1.2.d_MontELP – Standards Validation Briefing	based on assessment results. While these documents
 Overall and conditional standard 	Book.pdf	
error of measurement of the State's	 Page 28 – Explains the comparative 	provide an overview of the process and results of the standards validation process, they do not provide evidence
assessments, including any domain or	analysis of WIDA and Smarter	of classification accuracy and consistency for Montana
component sub-tests, as applicable;	Balanced/ACT with Writing data to	English Learners with applied cut scores at all proficiency
 Consistency and accuracy of 	determine a proficiency cut score	levels for ACCESS using latest year of data available.
estimates in categorical classification	recommendation.	levels for Access using fatest year of data available.
decisions for the cut scores,	○ Figures 19-21 – Shows trend data for ELP	
achievement levels or proficiency	test takers on state assessments.	
levels based on the assessment	 Figures 22-24 – Show confusion matrices 	
results;	for potential proficiency cut score ranges.	
• For computer-adaptive tests,	o Figures 29-31 - Shows the relationship of	
evidence that the assessments	state assessments to EL students'	
produce test forms with adequately	performance on WIDA assessments and	
precise estimates of an EL's English	impact data for potential cut score	
proficiency.	decisions.	

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Citical Elcincit	reference) O Page 37 – Smarter Balanced Never and Ever ELs Spreadsheet showing proficiency levels on Smarter Balanced assessments for ELs, former ELs, and never ELs for content areas and subgroups used to determine proxy data for standards validation process. 1.2.e_MontELP – Standards Validation Workshop Process Report.pdf O Page 4 – Discusses rationale for using proxy data. Pages 19-20 – Discusses process for considering Smarter Balanced and ACT with Writing data. Pages 22-24 – Overviews panel discussions of Smarter Balanced impact data and EL proficiency levels. Adequately precise estimates of an EL's English proficiency: Evidence has been submitted by WIDA on behalf of Consortium states.	State Documentation or Evidence

Section 4.1 Summary Statement

__ No additional evidence is required or

- X The following additional evidence is needed/provide brief rationale:
 - Evidence of Consistency and accuracy of estimates in categorical classification decisions for Montana for cut scores and proficiency levels based on assessment results.

Critical Element 4.2 – Fairness and Accessibility

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
For all State ELP assessments, assessments should be developed, to the extent practicable, using the principles of universal design for learning (UDL) (see definition ²).	No State-specific evidence. Refer to evidence submitted as part of WIDA Consortium common submission.	Evidence in support of this critical element has been submitted by the WIDA Consortium on behalf of all Consortium members. The State did not submit any additional evidence for this Critical Element.
For ELP assessments, the State has taken reasonable and appropriate steps to ensure that its assessments are accessible to all EL students and fair across student groups, including ELs with disabilities, in their design, development, and analysis.		
Section 4.2 Summary Statement		
No additional evidence is required or The following additional evidence is no	reded/provide brief rationale:	

² 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

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 <i>ELP assessments</i> , including performance for EL students with high and low levels of English language proficiency and with different proficiency profiles across the domains of speaking, listening, reading, and writing.	No State-specific evidence. Refer to evidence submitted as part of WIDA Consortium common submission.	Evidence in support of this critical element has been submitted by the WIDA Consortium on behalf of all Consortium members. The State did not submit any additional evidence for this Critical Element.
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 (and <i>for ELP assessments, any applicable domain or component sub-tests</i>) that are designed to produce reliable and meaningful results, facilitate valid score interpretations, and report assessment results in terms of the State's <i>ELP standards</i> .	Evidence in support of Critical Element 4.4 has been submitted by the WIDA Consortium on behalf of all Consortium members. Montana is not submitting any additional evidence for this Critical Element.	The State refers to evidence submitted as part of the WIDA Consortium common submission. It also refers to the State's response in Critical Element 5.1
For ELP assessments, if an English learner has a disability that precludes assessment of the student in one or more of the required domains/components (listening, speaking, reading, and writing) such that there are no appropriate accommodations for the affected domain(s)/component(s), the State must provide a description of how it will ensure that the student is assessed in the remaining domain(s)/component(s) in which it is possible to assess the student, and a description of how this will occur. ³		
Section 4.4 Summary Statement		
No additional evidence is required or		
The following additional evidence is need	eded/provide brief rationale:	

 $^{^3}$ See full reference in regulation, 34 CFR $\$ 200.6(h)(4)(ii) (online at $\underline{\text{https://www.ecfr.gov/cgi-bin/text-idx?SID}} = 0.76168696736C5931b4549cc15547ee9\&mc=true\&node=se34.1.200_16\&rgn=div8})$

Critical Element 4.5 – Multiple Assessment Forms

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
If the State administers multiple forms of <i>ELP assessments</i> within or across gradespans, ELP levels, or school years, the State ensures that all forms adequately represent the State's <i>ELP standards</i> and yield consistent score interpretations such that the forms are comparable within and across settings.	No State-specific evidence. Refer to evidence submitted as part of WIDA Consortium common submission.	Evidence in support of this critical element has been submitted by the WIDA Consortium on behalf of all Consortium members. The State did not submit any additional evidence for this Critical Element.
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

[list additional evidence needed w/brief rationale]

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	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), 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 State-specific evidence. Refer to evidence submitted as part of WIDA Consortium common submission.	Evidence in support of this critical element has been submitted by the WIDA Consortium on behalf of all Consortium members. The State did not submit any additional evidence for this Critical Element.
Section 4.6 Summary Statement		
No additional evidence is required or		
The following additional evidence is no	eeded/provide brief rationale:	

Critical Element 4.7 – Technical Analysis and Ongoing Maintenance

	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
Critical Element The State: 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 Evidence of adequate technical quality is made public, including on the State's website.	Evidence (Record document and page # for future	

Section 4.7 Summary Statement

No additional evidence is required or

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

For ACCESS and Alternate ACCESS

- Evidence that the State has a system for monitoring, maintaining, and improving, as needed, the quality of its assessment system (e.g., an outline of the State's deliberative cycle for reviewing and updating the State's ELP standards and assessments).
- Evidence of adequate technical quality is made public, including on the State's website (e.g., evidence that the technical reports are made public or a summary of the technical reports is made public on the State's website.)

SECTION 5: INCLUSION OF ALL STUDENTS

Critical Element 5.1 – Procedures for Including Students with Disabilities

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State has in place procedures to ensure the inclusion of all public elementary and secondary school students ⁴ 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. • For ELP assessments, policies that require the inclusion of an EL with a disability that precludes assessment of the student in one or more of the required domains (speaking, listening, reading, and writing) such that there are no appropriate accommodations for the affected component (the State must assess the student's English language proficiency based on the remaining components in which it is possible to assess the student).	Policies and procedures to ensure inclusion of all public elementary and secondary school students with disabilities in the assessment system: ACCESS for ELLs and Alternate ACCESS for ELLs ■ 1.1.k_MontELP − English Learner Guidance for School Districts.pdf □ Page 21 − Reiterates the State's commitment to assessing EL students with disabilities. ■ 1.3.a_MontELP − Administrative Rule 10.56 − Assessment.pdf □ Section 101 − Statewide Assessment − Charges the Board of Public Education with adopting rules for state-level assessment in the public schools. □ Section 102 − Participation − States that school districts shall annually administer statewide assessments to all students in accordance with state and federal laws and regulations. Further, states, "State-level assessments aligned to Montana-English language proficiency standards shall be administered to all students identified as English Learners (EL) in grades K−12."	For ACCESS and Alternate ACCESS The State has provided sufficient evidence to satisfy the requirement of this Critical Element that the State has procedures in place to ensure inclusion of all public elementary and secondary school students with disabilities in ELP assessment when appropriate and alternate ELP assessment as appropriate. Peers were unable to locate the specific method that the State uses to ensure that EL students taking less than four domains receive a score based on the remaining domains in which they are tested. The evidence provided in 1.1.k. links to technical document 5.1.e. which provides WIDA's report on options for calculating a score for ELs who do not complete all four domains. However, the policy regarding which method is approved and executed for scoring in Montana is not provided.

⁴ For ELP peer review, this refers to ELs with disabilities.

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	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	Decisions about how to assess students with	State Documentation of Evidence
	disabilities made by student's IEP team (or	
	other applicable placement team) based on	
	the student's individual needs:	
	ACCESS for ELLs	
	• 1.3.g MontELP – WIDA Test Administration	
	Manual, 2018-2019.pdf	
	o Page 67 (pdf p. 69) – Recognizes the role of	
	the student's IEP team in determining	
	assessment accommodations.	
	o Page 100 (p. 102) – Further recognizes the	
	role of the IEP team.	
	 1.3.f_MontELP – WIDA District and School 	
	Test Coordinators Maunal.pdf	
	o Page 15-16 (pdf pp. 16-18) – Section 2.5	
	discusses Accessibility and	
	Accommodations as determined by the	
	student's IEP team.	
	• 2.3.f_MontELP – WIDA Accessibility and	
	Accommodations Supplement.pdf	
	o Pages 3-4 (pdf pp. 5-6) – Discusses the role	
	of the IEP team in assessing EL students	
	with a disability.	
	o Pages 14-16 (pdf pp. 16-18) – Section 2.4	
	discusses accommodations available on the	
	assessment and provides guidance regarding	
	the appropriateness.	
	• 1.1.k_MontELP – English Learner Guidance for School Districts.pdf	
	n 44 â (77 4 mm) 1	
	o Page 21- States, "Under IDEA, the determination of which students are English	
	language learners with disabilities and the	
	type of accommodations they receive	

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
	should be made by the student's IEP team" Pages 24 – Discusses the role of an IEP for EL students with disabilities. • 5.1.a_MontELP – Student Support Services Assessment and Accessibility Videos.pdf Screen shots of where accessibility training videos are accessed on the OPI website. • 5.1.b_MontELP – Making Statewide Assessments Accessible.pdf Professional development presentation directed to assist IEP teams in determining and documenting appropriate accommodations. Slide 38 – ACCESS for ELLs graphic. • 5.1.c_MontELP – Sped Community of Practice Schedule.pdf Shows topics and schedule of monthly meetings for Special Education teachers, including discussion of assessment and inclusion issues.	State Documentation of Evidence
	Alternate ACCESS for ELLs	
	 1.3.f_MontELP - WIDA District and School Test Coordinators Maunal.pdf Page 61 (pdf p. 63) - Discusses scheduling and participation in the Alternate ACCESS as determined by the student's IEP team. 1.4.o_MontELP - Decision Tree for Alternate Assessment WIDA Students.pdf Aids district IEP teams as they determine a student's eligibility for the Alternate 	
	ACCESS assessment. • 1.4.p_MontELP – Alternate Eligibility	
	Criteria.pdf	

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	o Provides guidance when deciding a student's eligibility for the alternate assessment. ■ 1.4.q_MontELP − Eligibility Criteria Worksheet.pdf ○ Checklist resource for IEP teams in determining eligibility for alternate assessments, including WIDA assessments. ■ 1.1.I_MontELP − ELP Testing Requirements Screenshot.pdf ○ Screenshot from Montana OPI's webpage clearly communicating all identified English learners in Grades K−12 must be assessed annually using WIDA ACCESS (or Alternate ACCESS until they reach proficiency) ■ 5.1.b_MontELP − Making Statewide Assessments Accessible.pdf ○ Slides 28-29 − Alternate assessment decision criteria. ■ 1.1.k_MontELP − English Learner Guidance for School Districts.pdf ○ Page 8 - Discusses pre-screening and IEP documentation for ELs with significant cognitive disabilities. ○ Page 16 − Provides resources for serving ELs with significant cognitive disabilities. Requirements pertaining to AELPA only:	State Documentation or Evidence
	Guidelines for determining when to assess a	
	student using AELPA	
	• 1.4.0 MontELP – Decision Tree for Alternate	
	Assessment WIDA Students.pdf	

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	 Aids district IEP teams as they determine a student's eligibility for the Alternate ACCESS assessment. 2.3.f_MontELP - WIDA Accessibility and Accommodations Supplement.pdf Pages 14-16 - Section 2.4 discusses accommodations available on the assessment and provides guidance regarding the appropriateness. 1.3.f_MontELP - WIDA District and School Test Coordinators Maunal.pdf Page 15-16 (pdf pp. 17-18) - Section 2.5 discusses Accessibility and Accommodations as determined by the student's IEP team. 	
	Information for IEP teams to inform decisions about AELPA assessment 1.4.o_MontELP - Decision Tree for Alternate Assessment WIDA Students.pdf Aids district IEP teams as they determine a student's eligibility for the Alternate ACCESS assessment. 1.4.p_MontELP - Alternate Eligibility Criteria.pdf Provides guidance when deciding a student's eligibility for the alternate assessment. Communicating with parents of students	
	Evidence Provided by WIDA in Consortium-Level Submission:	

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	(WIDA did not provide this evidence in response to Critical Element 5.1; however, this document was provided as part of the Consortium's evidence packet in support of other Critical Elements.)	Same Dominentation of Lyndense
	 2.1.b_WIDA Alternate ACCESS for ELLs Interpretive Guide for Score Reports.pdf Pages 15-16 (pdf pp. 17-18) – Describes how to share Individual Student Reports with parents. Pages 32-34 (pdf pp. 34-36) – Provides sample score reports to share with parents 	
	Disseminate information on appropriate use of accommodations; ■ 2.3.f_MontELP − WIDA Accessibility and Accommodations Supplement.pdf □ Pages 14-16 (pdf pp. 16-18) − Section 2.4 discusses accommodation available on the assessment and provides guidance regarding the appropriateness. ■ 1.4.o_MontELP_Decision Tree for Alternate Assessment WIDA Students.pdf □ Aids district IEP teams as they determine a student's eligibility for the Alternate ACCESS assessment.	
	Guidelines for implementation and	
	monitoring of IEP teams in determining that	
	students should participate in AELPA;	
	• 2.3.f_MontELP – WIDA Accessibility and	
	Accommodations Supplement.pdf	
	o Pages 14-16 (pdf pp. 16-18) – Section 2.4 discusses accommodation available on the	

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	assessment and provides guidance regarding the appropriateness. • 1.4.q_MontELP - Eligibility Criteria Worksheet.pdf • Checklist for determining eligibility, guidelines for IEP teams, and instructions for documenting accommodations/eligibility for alternate assessments in AIM. • 1.4.o_MontELP_Decision Tree for Alternate Assessment WIDA Students.pdf • Aids district IEP teams as they determine a student's eligibility for the Alternate ACCESS assessment. • 1.4.p_MontELP-Alternate Eligibility Criteria.pdf • Provides guidance when deciding a student's eligibility for the alternate assessment. • 5.1.d_MontELP - Guidelines for Including All Students in MontCAS Assessments.pdf • Provides direction to local personnel for including eligible student's IEP plan in AIM and properly registering the student for participation in the alternate assessment and/or accommodations. • 2.3.c_MontELP - Access for ELLs Webinar 2.pdf • Page 18 - Slide indicates Alternate ACCESS for ELLs participation is determined by IEP team. Policies for including students whose disabilities preclude them from being assessed in all required domains:	State Documentation or Evidence

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	Evidence Provided by WIDA in Consortium-Level Submission:	State Documentation of Evidence
	(WIDA provided this evidence document in support of Critical Element 4.4. Montana follows WIDA's guidance for assessing students in fewer than four domains, and Montana is submitting the Consortium's evidence in response to this component of Critical Element 5.1.) • 5.1.e_WIDA – WIDA Technical Report – March 2019.pdf • Describes technically sound methods for determining WIDA assessment scores based on fewer than four domains.	
	Evidence Specific to Montana ELP Submission: • 1.1.k_MontELP - English Learner Guidance for School Districts.pdf • Page 21 - States, "Some of these identified students may not be able to take one or more of the four domains (Speaking, Listening, Reading, and Writing) of the ACCESS for ELLs assessment due to their disabilities." Users are directed to the OPI Statewide Testing Page on Accessibility Resources. • Page 23 - Points to method for calculating scores for students who cannot complete all four domains of the ACCESS for ELLs or Alternate ACCESS assessment.	
Section 5.1 Summary Staten		
No additional evidence is requ	iired 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 not Evidence of the specific method (the score based on the remaining domain).	he WIDA option selected and used) that the State uses to en-	sure that EL students taking less than four domains receive a

Critical Element 5.2 - DOES NOT APPLY to ELP Assessment Peer Review

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence	
Note: This critical element does not apply to ELP assessments, as the requirements only apply to the inclusion of ELs in <u>academic</u> <u>assessments</u> .	Does not apply for ELP assessments.		
Section 5.2 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 5.3 – Accommodations

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State makes available appropriate accommodations and ensures that its assessments are accessible to students with disabilities and ELs, including ELs with disabilities. Specifically, the State: • Ensures that appropriate accommodations are available for ELs; • Has determined that the accommodations it provides (1) are appropriate and effective for meeting the individual student's need(s) to participate in the assessments, (2) do not alter the construct being assessed, and (3) allow meaningful interpretations of results and comparison of scores for students who need and receive accommodations and students who do not need and do not receive accommodations; • Has a process to individually review and allow exceptional requests for a small number of students who require accommodations beyond those routinely allowed. • Ensures that accommodations for all required assessments do not deny students with disabilities or ELs the opportunity to participate in the assessment and any benefits from participation in the assessment.	ACCESS for ELLs Appropriate accommodations available for ELs: 2.3.f_MontELP - WIDA Accessibility and Accommodations Supplement.pdf Provides guidance for districts regarding accommodations. 1.3.f_MontELP - WIDA District and School Test Coordinators Manual.pdf Page 15 (pdf p. 17) - Provides more information regarding accommodations. 1.3.g_MontELP - WIDA Test Administration Manual, 2018-2019.pdf Page 17 (pdf p. 19) - Provides the accommodation framework. Page 28 (pdf p. 30) - Lists accommodations. Spreadsheet training tool illustrating allowable accommodations for all state assessments, including WIDA assessments by domain. Has determined that accommodations are appropriate for meeting students' needs; do not alter the construct being assessed; and allow meaningful interpretation of results: 2.3.f_MontELP - WIDA Accessibility and Accommodations Supplement.pdf Pages 10-14 (pdf pp. 12-16) - Discusses how accessibility features and	For ACCESS and Alternate ACCESS The State has provided evidence it ensures appropriate accommodations are available for ELs and ELs with the most significant cognitive disabilities. • Document 2.3.f. –WIDA accessibility and accommodation supplement includes accommodations provided to ELs within ACCESS 2.0. • Process for individual exceptional requests for accommodations is provided in Test Security Manual. However, peers were unable to locate evidence that specifically addresses that the accommodations the State provides are appropriate and effective for meeting the individual student's need(s) to participate in the assessment, do not alter the construct being measured, 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 (e.g., research supporting the accommodations meet these criteria). Although the State has provided evidence of a process to individually review and allow exceptional requests for a small number of students who require accommodations beyond those routinely allowed, the State should provide a specific example, if available, the application of this process or a statement to indicate the process was not used.

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
	accommodations do not change the construct. • 5.3.a_MontELP – Accommodations Crosswalk.xlsx Spreadsheet training tool illustrating allowable accommodations for all state assessments, including WIDA assessments by domain. Shows continuity of accommodations across all state assessments.	
	Has a process to individually review and	
	allow exceptional requests:	
	 2.4.a MontELP – Montana Test Security Manual.pdf	
	Ensures that accommodations do not deny	
	students with disabilities or ELs the	
	opportunity to participate in the assessment	
	and any benefits from participation in the	
	 assessment: 1.1.k_MontELP - English Learner Guidance for School Districts.pdf 	

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	Pages 20-21 – Describes accommodations	State Documentation of Evidence
	as procedures to ensure inclusion of all	
	students with disabilities in all components	
	of the state testing program.	
	• 2.4.a_MontELP – Montana Test Security	
	Maual.pdf	
	 Page 32 – Describes process for requesting exceptional accommodations, which ensures 	
	that a student needing an accommodation not	
	included in the WIDA framework will not be	
	denied the opportunity to participate in the	
	assessment.	
	Alternate ACCESS for ELLs	
	Appropriate accommodations available for	
	ELs:	
	• 1.3.g_MontELP – WIDA Test Administration	
	Manual, 2018-2019.pdf	
	o Page 149 (pdf p. 151) – Lists Alternate	
	ACCESS accommodations.	
	• 2.3.f_MontELP – WIDA Accessibility and Accommodations Supplement.pdf	
	Provides guidance for districts regarding accommodations.	
	• 1.3.f_MontELP - WIDA District and School Test	
	Coordinators Manual.pdf	
	o Page 15 (pdf p. 17) – Provides guidance for	
	more information regarding	
	accommodations.	
	• 5.3.a_MontELP - Accommodations	
	Crosswalk.xlsx	
	Spreadsheet training tool illustrating	
	allowable accommodations for all state	

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	assessments, including WIDA assessments by domain.	
	Has determined that accommodations are	
	appropriate for meeting students' needs; do	
	not alter the construct being assessed; and	
	allow meaningful interpretation of results:	
	2.3.f_MontELP - WIDA Accessibility and Accommodations Supplement.pdf Pages 10-15 (pdf pp. 12-17) - Discusses how accessibility features and accommodations do not change the construct. 5.3.a_MontELP - Accommodations Crosswalk.xlsx Spreadsheet training tool illustrating allowable accommodations for all state assessments, including WIDA assessments by domain. Shows continuity of accommodations across all state assessments.	
	Has a process to individually review and	
	allow exceptional requests:	
	(Processes for Alternate ACCESS are the same those for	
	ACCESS for ELLs.)	
	 2.4.a_MontELP - Montana Test Security Manual.pdf Page 32 - Describes process for LEA personnel to request non-routine accommodations. 	
	2.5.l_MontELP - MontCAS Application Screen.pdf	

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	2.5.k_MontELP - MontCAS User Guide.pdf Page 6 (pdf p. 7) - Describes steps to make exceptional requests, along with screen shots from MontCAS Application.	State Documentation of Evidence
	Ensures that accommodations do not deny students with disabilities or ELs the opportunity to participate in the assessment	
	and any benefits from participation in the	
	 assessment: (Processes for Alternate ACCESS are the same as those for ACCESS for ELLs.) 1.1.k_MontELP - English Learner Guidance for School Districts.pdf	

Section 5.3 Summary Statement

No additional evidence is required or

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

For ACCESS and Alternate ACCESS

• Evidence, such as research, showing that the accommodations provided are appropriate and effective, do not alter the construct of the test, and allow for meaningful interpretation (e.g., reports of data analyses, studies or other evidence that indicate scores based on accommodated and non-accommodated test administration can be meaningfully compared, or a summary of the frequency of use of accommodations by student demographic characteristics.)

Comments/Notes/Questions/Suggestions Regarding

State Documentation or Evidence

Evidence (Record document and page # for future

reference)

Critical Element

1 04 04 1	,	
• A specific example of the State's p those routinely allowed.	process to review and allow exceptional requests for a small	number of students who require accommodations beyond
The State monitors test administration in its districts and schools to ensure that appropriate assessments, with or without accommodations, are selected for all students with disabilities and ELs so that they are appropriately included in assessments and receive accommodations that are: 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	st Administration for Special Populations Evidence (Record document and page # for future reference) (No evidence was provided by WIDA in support of Critical Element 5.4 in the Consortium-level submission.) ACCESS for ELLs Consistent with State's policies for accommodations: • 5.4.a_MontELP - Montana Action Plan.pdf ○ Page 4 - 5.4 - Describes steps for monitoring test administration for special populations. • 2.4.f_MontELP - 2019-2020 Monitoring Schedule.pdf ○ Provides the State's monitoring schedule • 2.4.e_MontELP - Monitoring Tool.pdf ○ Page 4 - Requires documentation of accommodation usage rates	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence For ACCESS and Alternate ACCESS: The State has provided some evidence of monitoring test administrations for special populations. The State's evidence describes the steps for monitoring test administration for special population. For example, document 2.4.f provides a schedule for monitoring. Also, document 5.4.a indicates plans to add a module to its student information system collection to monitor for this Critical Element starting in 2021-22. However, the results of monitoring are not included as evidence. The State should provide evidence that the monitoring that includes the ACCESS and Alternate ACCESS assessments was completed. The State should also include documentation of
instruction and/or practice;	• 2.4.e_MontELP – Monitoring Tool.pdf	 what actions were taken if any issues were found as part of that monitoring. In addition, it appears that Montana was able to provide ACCESS and Alternate ACCESS in 2020 despite the COVID-19 pandemic. If so, it seems that results from this monitoring, or from the 2018-19
or team designated by a district to make these decisions; or another process for an EL; • Administered with fidelity to test administration procedures;	monitoring. Appropriate for addressing a student's disability: • 2.4.a_MontELP – Montana Test Security Manual.pdf	 administrations, could be provided as evidence. The AIM Special Population Modules will include flags that would indicate if an accommodation is planned whether the student has an IEP in the system. It isn't clear how the state will monitor whether the requested accommodation is in the content of the of the student's IEP plan.

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Monitored for administrations of all required ELP assessments, and AELPA.	o Page 6 – Outlines that the WIDA ACCESS for ELLs is included in all assessment monitoring. • 1.4.j_MontELP – AIM Special Population Modules.pdf ○ Pages 1-2 – Includes screenshots of new modules within the statewide student information system (AIM/Infinite Campus) that allow the OPI to track and monitor provision of accommodations for special populations. ○ Page 12-13 – Shows dropdowns for available 504 accommodations. ○ Pages 14-19 – Shows ACCESS for ELLs accommodations by domain. Consistent with accommodations provided to students during instruction: • 2.4.a_MontELP – Montana Test Security Manual.pdf ○ Page 6 – Outlines that the WIDA ACCESS for ELLs is included in all assessment monitoring. • 1.4.j_MontELP – AIM Special Population Modules.pdf ○ Screenshots of new modules within the statewide student information system (AIM/Infinite Campus) that allow the OPI to track and monitor provision of accommodations for special populations. Administered with fidelity to test administration procedures: • 2.4.a_MontELP – Montana Test Security Manual.pdf	Page 149 of document 1.3.g_MontELP – WIDA Test Administration Manual, 2018-2019.pdf indicates accommodations should match those provided to students during instruction. However, this does not show how the State monitors that this is done. The State should provide specific evidence that the accommodations they receive are consistent with accommodations provided to the students during instruction and/or practice It is not clear to peers how Montana monitors use of accommodations to determine that the use of accommodations does not alter the construct being assessed. It is also not clear whether the State has a process for regularly reviewing accommodations selected, and whether those alter the construct assessed. Peers noted that document 1.4.j, page 2, lists the Montana assessments, but it does not include ACCESS and Alternate ACCESS for documenting accommodations and for monitoring use of them. The ELP assessments are referenced later in document, however.

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Camena Entirent	reference)	State Documentation or Evidence
	o Page 6 – Outlines that the WIDA ACCESS	
	for ELLs is included in all assessment	
	monitoring.	
	Alternate ACCESS for ELLs	
	Consistent with State's policies for	
	accommodations:	
	• 5.4.a_MontELP - Montana Action Plan.pdf	
	○ Page 4 – 5.4 – Describes a state working	
	group to enhance monitoring for students	
	with significant cognitive disabilities and	
	ELs, as well as technical assistance outreach	
	efforts.	
	• 2.4.f_MontELP – 2019-2020 Monitoring	
	Schedule.pdf	
	o Provides the State's monitoring schedule.	
	• 2.4.e_MontELP – Monitoring Tool.pdf	
	 Page 4 – Requires documentation of identification rates for alternate assessments. 	
	• 2.4.a_MontELP – Montana Test Security	
	Manual.pdf	
	• Page 6 – Outlines that the Alternate	
	ACCESS is included in all assessment	
	monitoring.	
	Appropriate for addressing a student's	
	disability:	
	• 2.4.a MontELP – Montana Test Security	
	Manual.pdf	
	o Page 6 – Outlines that the WIDA ACCESS	
	for ELLs is included in all assessment	
	monitoring.	
	• 1.4.j MontELP – AIM Special Population	
	Modules.pdf	
	 Screenshots of new modules within the 	
	statewide student information system	
	(AIM/Infinite Campus) that allow the OPI to	

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
	track and monitor provision of	
	accommodations for special populations.	
	Consistent with accommodations provided to	
	students during instruction:	
	2.4.a_MontELP – Montana Test Security Manual.pdf	
	 Page 6 – Outlines that the WIDA ACCESS for ELLs is included in all assessment monitoring. 	
	• 1.3.g_MontELP – WIDA Test Administration Manual, 2018-2019.pdf	
	 Page 149 – Indicates accommodations should match those provided to students during instruction. 	
	• 1.4.j_MontELP – AIM Special Population	
	Modules.pdf O Screenshots of new modules within the statewide student information system (AIM/Infinite Campus) that allow OPI to track and monitor provision of accommodations for special populations.	
	Administered with fidelity to test	
	administration procedures:	
	 2.4.a_MontELP – Montana Test Security Manual.pdf Page 6 – Outlines that the WIDA ACCESS 	
	for ELLs is included in all assessment monitoring.	
Section 5.4 Summary Sta	atement	
No additional evidence is r	required or	

Critical Element		Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	Critical Element	reference)	State Documentation or Evidence
	For ACCESS and Alternate ACCESS		
	• Evidence that monitoring was completed and include documentation of what actions were taken if any issues were found as part of that monitoring.		
	• Evidence that the accommodations students receive are consistent with accommodations provided to the students during instruction and/or practice (e.g., evidence from the AIM Special Population Module monitoring for consistency in accommodations between test administration and instruction).		

SECTION 6: ELP ACHIEVEMENT STANDARDS AND REPORTING

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

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
 For ELP standards: The State adopted ELP achievement standards that address the different proficiency levels of ELs; If the State has developed alternate ELP achievement standards, it has adopted them only for ELs who are students with the most significant cognitive disabilities who cannot participate in the regular ELP assessment even with appropriate accommodations. 	ACCESS for ELLs Evidence Provided by WIDA in Consortium-Level Submission: 2.1.a_WIDA - ACCESS for ELLs 2.0 Interpretive Guide for Score Reports.pdf Page 9-10 (pdf pp. 11-12) - Discusses proficiency level scores. Pages 20-24 (pdf pp. 22-26) - Provides a description of proficiency level scores. Pages 36-38 (pdf pp. 38-40) - Provides performance level descriptors on score reports.	The evidence provided indicates that the State uses the WIDA achievement standards for ELP to provide different achievement standards and proficiency levels for ELs assessed using the ACCESS and Alternate ACCESS. Document 1.1.e includes descriptors for WIDA's established performance levels: Entering, Emerging, Developing, Expanding, Bridging, and Reaching. The evidence that is Montana-specific shows the use of WIDA ELD standards and descriptions included in the Montana Administrative Rules for ELP standards. Interpretive Guides provide details regarding the achievement standards.
	Evidence Specific to Montana's ELP Submission: • 1.1.e_MontELP - Administrative Rule 10.53 - ELP Content Standards.pdf • Pages 6-11 - Includes descriptors for WIDA's established performance levels: Entering, Emerging, Developing, Expanding, Bridging, and Reaching.	For ACCESS The State's ESSA plan (1.1.j) indicates adoption of ELP standards in 2011, but as pointed out for CE 1.1, the State did not provide evidence of formal adoption of the newer 2012 WIDA ELP standards. 1.1.d cited in evidence in CE 1.1 indicates the State's adoption of the ELP standards included adoption of the ELP performance descriptors. If performance descriptors changed when the WIDA ELP

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
	 1.1.f_MontELP - WIDA_MT_ELD Standards Crosswalk.pdf	standards were amplified in 2012, the State should provide evidence of a validation of the new achievement standards. For Alternate ACCESS Although the State has provided participation guidelines for EL students with significant cognitive disabilities to take the Alternate ACCESS, the State still needs to submit evidence of adoption of the alternate ELP achievement

Critical Element	Evidence (Record document and page # for future Comments/Notes/Questions/Suggestions Regarding
Carrena Bivinoni	reference) State Documentation or Evidence
	Evidence Provided by WIDA in
	Consortium-Level Submission:
	• 2.1.b WIDA Alternate ACCESS for ELLs
	Interpretive Guide for Score Reports.pdf
	• Page 8 (pdf p. 10) – Shows the proficiency
	level scores.
	 Pages 21 (pdf p. 23) – Provides performance
	level descriptors on score reports.
	level descriptors on score reports.
	Eridanas CuasiCa ta Mantana la ELD
	Evidence Specific to Montana's ELP
	Submission:
	• 1.1.j_MontELP – ESSA Plan.pdf
	 Page 12 - Acknowledges the most recent
	adoption dates of the state standards.
	 Page 75 – Reflects amended entrance and
	exit criteria for Alternate ACCESS.
	1.2.e_MontELP-ESSA Redline Amendment.pdf
	o Pages 30-33 – Details exit criteria.
	o Pages 74-76 – Further details entrance and
	exit criteria.
	• 1.3.g_MontELP – WIDA Test Administration
	Manual, 2018-2019.pdf
	o Pages 146 and 148 (pdf pp. 148 and 150) –
	Provide a list of the range of proficiency
	levels assessed by the WIDA Alternate
	ACCESS assessment.

Section 6.1 Summary Statement

___ No additional evidence is required or

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

For ACCESS

• Evidence of a validation and adoption of new achievement standards resulting from the 2012 Amplification of the WIDA ELD Standards.

For Alternate ACCESS

Critical Element Evidence (Record document and page # for future reference) Comments/Notes/Questions/Suggestions Reg		Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
_	ate ELP achievement standards only for ELs who are studen ssment even with appropriate accommodations.	ats with significant cognitive disabilities who cannot

Critical Element 6.2 – ELP Achievement Standards Setting

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	State Documentation or Evidence
The State used a technically sound method and process that involved panelists with appropriate experience and expertise for setting: • ELP achievement standards and, as applicable, alternate ELP achievement standards, such that: • Cut scores are developed for every grade/grade band, content domain/language domain, and/or composite for which proficiency-level scores are reported.	Cut scores for every grade/grade band, content domain, language domain, and/or composite: Evidence in support of Critical Element 6.2 (standard-setting methodology and cut scores) has been submitted by the WIDA Consortium on behalf of all Consortium members. Montana is submitting supplemental documentation of determination of state-specific entrance and exit criteria (English proficiency along the continuum of the WIDA performance levels) as identified in the evidence presented for Critical Element 6.1. ACCESS for ELLs (The standards validation process for ACCESS for ELLs and Alternate ACCESS for ELLs was the same, and occurred simultaneously, to determine exit criteria for both assessments.)	Achievement Standard Setting relies on WIDA evidence and process for the achievement levels within grade/grade band, content domain, language domain or composite. Montana-specific process provided in evidence is for establishing an ELP exit score/criteria for exiting students from EL status. The process for standards validation of exit criteria provided in 6.2.a, 1.2.d., 1.2.e, appears to be technically sound. For ACCESS: 6.2.a shows the State's Standards Validation process and includes a list of panelists with a title as indication of expertise. The peers would like to see more specific brief description of each panelist's experience and expertise (e.g., for someone listed as cultural expert or EL specialist, it is unclear exactly what that means). For Alternate ACCESS:
	 6.2.a_MontELP - Standards Validation Workshop Slide Deck.pdf	The State has indicated the standards validation process for the Alternate ACCESS was the same as for ACCESS and occurred simultaneously. However, the State has not provided evidence of the experience the panel had with students with the most significant cognitive disabilities.

Critical Element		mments/Notes/Questions/Suggestions Regarding
Critical Element	7	te Documentation or Evidence
	Pages 81-128 – Detailed discussion of WIDA ACCESS for ELLs and Alternate ACCESS structure and content. Pages 130-137 – Discusses Montana's EL entrance and exit criteria. Page 138 – Overviews other states' EL exit criteria. Page 140 – Discusses WIDA research. Pages 145-153 – Shows historical data and trends following WIDA's updated standard setting between 2016 and 2017 assessments. Pages 155-166 – Compares Montana ELs' WIDA performance to performance on other state assessments. Pages 168-178 – Discusses OPI's proficiency recommendation, along with cultural considerations. Pages 181-190 – Discusses process for determining panel cut score recommendations. 1.2.d_MontELP – Standards Validation Briefing Book.pdf	te Documentation or Evidence
	Overviews rationale, method, and materials	
	for Montana's Standards Validation workshop.	
	• 1.2.e_MontELP - Standards Validation	
	Workshop Process Report.pdf	
	 Chapter 2 – Describes methods and results of 	
	standards validation.	
	Alternate ACCESS for ELLs	
	• 1.2.d_MontELP – Standards Validation Briefing	
	Book.pdf	
	 Page 13 – Specifically discusses Alternate 	
	Access.	

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	1.2.e_MontELP - Standards Validation Workshop Process Report.pdf Page 17-18 - Specifically discusses Alternate Access standards validation methodology and proxy data.	

Section 6.2 Summary Statement

No additional evidence is required or

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

For ACCESS

• Evidence that panelists for the standards evaluation had appropriate experience and expertise (e.g., a more specific brief description of each panelist's experience and expertise, such as explaining what is meant when a person is listed as cultural expert or EL specialist.)

For Alternate ACCESS

• Evidence that panelists had experience with students with the most significant cognitive disabilities.

Critical Element 6.3 – Aligned ELP Achievement Standards

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
For ELP achievement standards: The State has ensured that ELP assessment results are expressed in terms that are clearly aligned with the State's ELP standards, and its ELP performance-level descriptors. If the State has adopted alternate ELP achievement standards for ELs who are students with the most significant	Evidence in support of Critical Element 6.3 (ELP achievement standards) has been submitted by the WIDA Consortium on behalf of all Consortium members. Montana is submitting supplemental documentation of determination of state-specific entrance and exit criteria (English proficiency along the continuum of the WIDA performance levels) as identified in the evidence presented for Critical Element 6.1 and 6.2.	The State refers to evidence submitted by the WIDA Consortium on behalf of all Consortium members (since the State does not use different achievement standards/levels for communicating results of the assessment in regard to the English Language proficiency of a student), but the State did submit State-specific evidence regarding the determination of entrance and exit criteria, which appear to be the only criteria that are specific to the State.
cognitive disabilities, the alternate ELP achievement standards should be linked to the State's grade-level/grade-band ELP standards, and should reflect professional judgment of the highest ELP achievement standards possible for ELs who are students with the most significant cognitive disabilities.	ACCESS for ELLs and Alternate ACCESS for ELLs (The standards validation process for ACCESS for ELLs and Alternate ACCESS was the same, and occurred simultaneously.) • 6.2.a_MontELP - Standards Validation Workshop Slide Deck.pdf ○ Pages 155-166 - Compares Montana ELs' WIDA performance to performance on other state assessments. ○ Pages 168-178 - Discusses OPI's proficiency recommendation, along with cultural considerations. • 1.2.d_MontELP - Standards Validation Briefing Book.pdf ○ Pages 21-31 - Figures connecting the performance of Montana's ELs on WIDA assessments to their performance on other statewide assessments. ○ Page 37 - Excel spreadsheet showing performance of ELs, Former ELs, and Never	total score—this raises the question of how the State
	ELs on Smarter Balanced ELA and Math assessments. • 1.2.e_MontELP – Standards Validation Workshop Process Report.pdf	the alternate ELP achievement standards are linked to the State's grade-level/grade-band ELP standards. (The State should still provide evidence requested for Critical Element

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	 Chapter 2 – Documents standards validation process for ACCESS for ELLs and Alternate ACCESS. Pages 18-19 – Discusses presentation of impact data, relative to other statewide assessments. Page 17 – Specifically discusses proxy data for Alternate ACCESS relative to the Multi-State Alternate Assessment. 	
Section 6.3 Summary Statement		
No additional evidence is required o	r	
_X The following additional evidence i • Evidence of state-specific classif	s needed/provide brief rationale: ication accuracy for proficient and near-proficient students.	

Critical Element 6.4 - Reporting

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State reports its assessment results for all students assessed, and the reporting	ACCESS for ELLs	For ACCESS and Alternate ACCESS:
facilitates timely, appropriate, credible, and defensible interpretations and uses of those results by parents, educators, State	State reports assessment results on English language proficiency:	The State has demonstrated that it provides coherent and timely information about student's attainment of the State's ELP standards to parents. Document 2.6.a makes it clear
officials, policymakers and other stakeholders, and the public.	 2.6.a_MontELP – Administrative Rule 10.56- Reporting.pdf Points to Montana's administrative rule 	that statewide assessment results are released to the public accompanied by a clear statement of purpose, subject areas assessed, description of proficiency levels, and the
The State reports to the public its assessment results on <i>English language</i>	regarding making state assessment data available to the Legislature, the Board of	percentage of students who participated in the assessments.
proficiency for all ELs including the number and percentage of ELs attaining	Public Education, and the general public. • 6.4.a_MontELP – MontCAS 2018-19 State Report Card.pdf	The State's report card provides English language proficiency and progress on the EL assessment.
ELP.	 Page 2 - Provides English proficiency and progress levels for identified EL students. 	The Individual Student Reports for both ACCESS and Alternate Access include the main domains of Listening,
For the <i>ELP assessment</i> , the State provides coherent and timely information	• 6.4.b_MontELP – Screenshot Access to District Level Report Card.pdf	Speaking, Reading and Writing, but also includes additional composite domains of Oral Language, Literacy,
about each student's attainment of the State's ELP standards to parents that: • Reports the <i>ELs' English proficiency</i>	 Displays where and how one might access district-level reports of student achievement. 	and Comprehension, as well as an Overall score. These composite domains are combinations of some of the main
in terms of the State's grade	 6.4.c_MontELP – GEMS ELP Results Dashboard.pdf 	domains (e.g., Oral Language is 50% Listening and 50% Speaking). The report includes performance level
level/grade-band ELP standards (including performance-level descriptors);	 Screenshot of GEMS Dashboard with ELP results by proficiency levels and domain at the state level. 	descriptors for the four main domains but not for the composite domains. The State should work with WIDA to add PLDs for the additional combinations to clearly explain
Are provided in an understandable and uniform format;	• 6.4.d_MontELP – GEMS Data Definitions	what the results in those categories mean for students.
Are, to the extent practicable, written in a language that parents and guardians can understand or, if it is not practicable to provide written	Excerpt.pdf Screenshot of Data Definitions in GEMS articulating WIDA performance level cut points, proficiency levels, and performance level descriptors.	Results are provided in an understandable and uniform format and written in a language that parents and guardians can understand. Translations are available. Access is provided through an online system. Numerous parent
translations to a parent or guardian with limited English proficiency, are	• 5.4.a_MontELP - Montana Action Plan.pdf • Page 5 (6.4) – Describes components of	resources are available.
orally translated for such parent or guardian;	SLDS updates. • 6.4.e MontELP – Montana IES Grant	Evidence for state reporting to the public its assessment results on English language proficiency for all ELs
	Summary.pdf	

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
Upon request by a parent who is an individual with a disability as defined	 Summarizes components of OPI's grant to refresh SLDS. 	including the number and percentage of ELs attaining ELP is provided in the following documents:
by the ADA, as amended, are provided in an alternative format accessible to that parent.	Facilitates appropriate, credible	 Document 2.6.a_MontELP – Administrative Rule 10.56-Reporting.pdf Document 6.4.a MontELP – MontCAS 2018-19 State
accessible to that parent.	interpretations and uses of results by parents, educators, and other stakeholders:	Report Card.pdf. Peers noted that while 6.4.a provides data regarding English Learners' progress toward
	Evidence Provided by WIDA in Consortium-Level Submission:	proficiency, it does not provide a breakdown by subgroups within EL—the N count—'number and
	2.1.a_WIDA-ACCESS for ELLs 2.0 Interpretive Guide for Score Reports.pdf	percentage of ELs attaining ELP' is in the GEMS dashboard. If plans are to add disaggregation, additional evidence is needed that demonstrates these
	Evidence Specific to Montana's ELP Submission:	 disaggregations are available. Document 6.4.b_MontELP – Screenshot Access to District Level Report Card.pdf
	1.3.b_MontELP-Assessment Profile for WIDA Assessment.pdf	Document 6.4.c_MontELP – GEMS ELP Results Dashboard.pdf
	o Provides guidance for the use of the WIDA assessment across multiple audiences.	 Document 6.4.d_MontELP – GEMS Data Definitions Excerpt.pdf Document 6.4.f. – the links provided to families are
	• 6.4.f_MontELP - Report Card Information for Families.pdf • Screenshot of location on OPI website where	only screenshots, and peers are unable to assess the
	families can find definitions and interpretive information for data on their schools' Report Card.	Evidence that the State provides coherent and timely information about each student's attainment of the State's
	• 6.4.g_MontELP – Report Card Information for Educators & Administrators.pdf	ELP standards: Document 6.4.i_MontELP - Parent Notification
	 Screenshot of location on OPI website where educators and administrators can find interpretive information and guidance for sharing Report Card data with stakeholders. 	Letter.pdf. Peers wondered whether document 6.4.i. is available in multiple languages. This is another form of communication of assessment scores in addition to the score reports provided by WIDA.
	• 6.4.h_MontELP - MontCAS Score Use Training Powerpoint.pdf O Provides Montana educators guidance for	 Document 2.1.a_WIDA-ACCESS for ELLs 2.0 Interpretive Guide for Score Reports.pdf Page 21 (pdf p. 23) – Provides a sample score
	score interpretations. • 6.4.i MontELP - Parent Notification Letter.pdf	report. Timeliness:

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference) The letter template provided by the State aids parents in interpreting results. 6.4.j_MontELP – GEMS User Guide.pdf Assists stakeholders in interpreting data presented in GEMS. 6.4.k_MontELP – OPI EL Webpage Parent Resources.pdf Includes links to assist parents in interpreting WIDA assessment information. 6.4.l_MontELP – Sample Educational Plan for ELs.pdf	■ Document 6.4.n_MontELP – Assessment Bulletin, May 2020.pdf, page 7 Reports available in multiple languages: ■ Document 2.1.a_WIDA-ACCESS for ELLs 2.0 Interpretive Guide for Score Reports.pdf □ Page 16 (pdf p. 18) – Indicates reports are available from WIDA in multiple languages. (Appendix B gives the 46 languages and a sample Spanish report ■ Although score reporting is available through WIDA
	 Sample educational plan to assist LEA personnel in making instructionally relevant decisions using WIDA assessment data. 	translated versions, the languages represented do not include some of the most common languages of the State's ELs, such as Native American Languages.
	 Timely information to parents: 1.3.b_MontELP - Assessment Profile for the WIDA Assessment.pdf Identifies when WIDA score reports will be available, and states that reports are required by law to be shared with parents. 6.4.m MontELP - WIDA MT State Page.pdf 	No evidence was provided that EL's English proficiency reports address the following issue: "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."
	 States dates on which districts will receive individual student reports online and printed. 6.4.n_MontELP - Assessment Bulletin, May 2020.pdf Pages 7-8 - Identifies WIDA reporting timeline. 1.1.k_MontELP - English Learner Guidance for 	The State's website includes an ADA Notices that indicates "The OPI will provide alternative formats of written communications upon request (e.g., Braille, electronic, audio, etc.). However, this statement may not be clear to parents of students with a disability that this would include individual student reports.
	 Districts.pdf Page 22 - States, "It is required by law that results be shared with parents/guardians, but School Systems may decide how to do this." Page 28 - Discusses parent notification and states that parents must be notified within 30 	

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	days of the start of the school year that a student has been identified as EL.	
	Reports each EL's English proficiency in terms of the State's ELP standards, including performance level descriptors:	
	Evidence Provided by WIDA in Consortium-Level Submission: • 2.1.a_WIDA-ACCESS for ELLs 2.0 Interpretive Guide for Score Reports.pdf • Page 9-10 (pdf pp. 11-12) – Discusses proficiency level scores. • Pages 20-24 (pdf pp. 22-26) – Provides a description of proficiency level scores.	
	 Pages 36-38 (pdf pp. 38-40) – Provides performance level descriptors on score reports. Evidence Specific to Montana's ELP 	
	 Submission: 1.1.k_MontELP – English Learner Guidance for Districts.pdf Page 14 – Shows WIDA performance levels. Appendix D – Includes performance definitions. Page 26 – Discusses Montana's definition of proficiency and identifies Montana's proficiency criteria (4.7) on ACCESS for ELLs. 	
	Reports are provided in an understandable and uniform format:	

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
	Evidence Provided by WIDA in	
	Consortium-Level Submission:	
	• 2.1.a_WIDA-ACCESS for ELLs 2.0 Interpretive	
	Guide for Score Reports.pdf	
	o Page 21 (pdf p. 23) – Provides a sample	
	score report.	
	○ Appendix E – Provides proficiency	
	descriptors.	
	Reports written in a language that parents	
	and guardians can understand:	
	Evidence Provided by WIDA in	
	Consortium-Level Submission:	
	• 2.1.a WIDA-ACCESS for ELLs 2.0 Interpretive	
	Guide for Score Reports.pdf	
	o Page 16 (pdf p. 18) – Indicates reports are	
	available from WIDA in multiple languages.	
	Evidence Specific to Montana's ELP	
	Submission:	
	• 1.1.k_MontELP – English Learner Guidance for	
	School Districts.pdf	
	o Page 23 – Indicates translations are available	
	for parent reports.	
	o Page 28 – Describes district responsibility to	
	notify parents in the parents' home language.	
	Upon request by a parent with a disability as	
	defined by ADA, reports provided in format	
	accessible to that parent:	
	• 6.4.o_MontELP – ADA Screenshot.pdf	
	o Indicates the State's non-discrimination	
	policy in terms of communication.	

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	reference) • 6.4.p MontELP – State Nondiscrimination	State Documentation of Evidence
	Complaint Form.pdf	
	State of Montana complaint form.	
	5 State of Frontaina Compraints forms	
	Alternate ACCESS for ELLs	
	State reports assessment results on English	
	language proficiency:	
	(Note: Alternate ACCESS and ACCESS for ELLs	
	reporting is combined on the ELP Dashboard in GEMS.)	
	• 2.6.a_MontELP-Adminitrative Rule 10.56-	
	Reporting.pdf	
	 Points to Montana's administrative rule 	
	regarding making state assessment data	
	available.	
	Facilitates appropriate, credible	
	interpretations and uses of results by parents,	
	educators, and other stakeholders:	
	Evidence Provided by WIDA in	
	Consortium-Level Submission:	
	• 2.1.b WIDA Alternate ACCESS for ELLs	
	Interpretive Guide for Score Reports.pdf	
	Evidence Specific to Montana's ELP	
	Submission:	
	• 1.3.b MontELP-Assessment Profile for WIDA	
	Assessment.pdf	
	o Provides guidance for the use of the WIDA	
	Alternate ACCESS across multiple	
	audiences.	
	• 6.4.h_MontELP - MontCAS Score Use Training	
	PowerPoint	

Critical Element	Evidence (Record document and page # for future Comments/Notes/Questions/Suggestions Regarding
	reference) State Documentation or Evidence
	o Provides Montana educators guidance for
	score interpretations.
	6.4.i_MontELP_Parent Notification Letter
	o The letter template provided by the State aids
	parents in interpreting results.
	• 6.4.k_MontELP – OPI EL Webpage Parent
	Resources.pdf
	o Includes links to assist parents in interpreting
	WIDA assessment information.
	• 6.4.1_MontELP – Sample Educational Plan for
	ELs.pdf
	Sample educational plan to assist LEA
	personnel in making instructionally relevant
	decisions using WIDA assessment data.
	Timely information to parents:
	• 1.3.b_MontELP – Assessment Profile for the
	WIDA Assessment.pdf
	Identifies when WIDA score reports will be
	available, and states that reports are required
	by law to be shared with parents.
	• 6.4.m MontELP – WIDA State Page.pdf
	States dates on which districts will receive
	individual student reports online and printed.
	• 6.4.n MontELP – Assessment Bulletin, May
	2020.pdf
	o Pages 7-8 – Identifies WIDA reporting
	timeline.
	• 1.1.k MontELP – English Learner Guidance for
	Districts.pdf
	o Page 22 - States, "It is required by law that
	results be shared with parents/guardians, but
	School Systems may decide how to do this."
	o Page 28 – Discusses parent notification and
	states that parents must be notified within 30
	days of the start of the school year that a

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	student has been identified as EL. For students with disabilities, parents must be informed of how the program meets the child's IEP objectives. Reports each EL's English proficiency in terms of the State's ELP standards, including performance level descriptors: Evidence Provided by WIDA in Consortium-Level Submission: • 2.1.b_WIDA Alternate ACCESS for ELLs Interpretive Guide for Score Reports.pdf ○ Page 8 (pdf p. 10) – Shows the proficiency level scores. ○ Pages 21 (pdf p. 23) – Provides performance level descriptors on score reports. Evidence Specific to Montana's ELP	State Documentation or Evidence
	Submission: ■ 1.1.k_MontELP – English Learner Guidance for Districts.pdf □ Page 14 – Shows WIDA performance levels. □ Appendix D – Includes performance definitions. □ Page 26 – Discusses Montana's definition of proficiency and identifies Montana's	
	proficiency criteria (P2) on Alternate ACCESS for ELLs. Reports are provided in an understandable and uniform format:	

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
	Evidence Provided by WIDA in	
	Consortium-Level Submission:	
	• 2.1.b WIDA Alternate ACCESS for ELLs	
	Interpretive Guide for Score Reports.pdf	
	o Pages 19-21 (pdf pp. 21-23) – Provide	
	sample score reports.	
	o Page 8 (pdf p. 10) – Shows the proficiency	
	level scores.	
	○ Pages 21(pdf p. 23) – Provides performance	
	level descriptors on score reports.	
	Reports written in a language that parents	
	and guardians can understand:	
	una guaratuns cun unacristana.	
	Evidence Provided by WIDA in	
	Consortium-Level Submission:	
	• 2.1.b WIDA Alternate ACCESS for ELLs	
	Interpretive Guide for Score Reports.pdf	
	o Page 14 (pdf p. 16) – Indicates reports are	
	available from WIDA in multiple languages.	
	Evidence Specific to Montana's ELP	
	Submission:	
	• 1.1.k_MontELP – English Learner Guidance for	
	School Districts.pdf	
	 Page 23 – Indicates translations are available 	
	for parent reports.	
	o Page 28 - Describes district responsibility to	
	notify parents in the parents' home language.	
	Upon request by a parent with a disability as	
	defined by ADA, reports provided in format	
	accessible to that parent:	
	• 6.4.0 MontELP – ADA Screenshot.pdf	

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	 Indicates the State's non-discrimination policy in terms of communication. 6.4.p_MontELP – State Nondiscrimination Complaint Form.pdf State of Montana complaint form. 	

Section 6.4 Summary Statement

No additional evidence is required or

- X The following additional evidence is needed/provide brief rationale:
 - Evidence that performance level descriptors for the composite scores are included on the individual student reports and clearly explain what the scores in those categories mean for students. This evidence should also be included with documentation submitted for Critical Element 6.1.
 - Evidence that 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 (e.g., refinement of ADA Notice on State's webpage that written communications include individual student reports).
 - Evidence that the reports of EL's English proficiency are written in a language that the parents/guardians can understand or provided through services for oral translation (e.g., Native American languages).

SECTION 7: DOES NOT APPLY TO ELP ASSESSMENT PEER REVIEW

U. S. Department of Education Peer Review of State Assessment Systems

January-March 2021 State ELP 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 ELP Standards for All English Learners

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
For English language proficiency (ELP) standards:		This critical element will be addressed by the state.
The State formally adopted K-12 ELP standards for all ELs in public schools 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 – Coherent and Progressive ELP Standards that Correspond to the State's Academic Content Standards

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
For ELP standards:	1.2-3	The blue text is the additional evidence requested by
The ELP standards:	2012 Amplification of The English Language	previous peer reviewers.
 are derived from the four 	Development Standards	
domains of speaking, listening,		For the State's ELP standards:
reading, and writing;	1.2-4	For Science, evidence that the English Language
 address the different proficiency 	Alignment Study between the Common Core State	Proficiency (ELP) standards contain language
levels of ELs; and	Standards in English Language Arts and Mathematics	proficiency expectations that reflect the language
 align to the State academic 	and the WIDA English Language Proficiency Standards,	needed for English Learners (ELs) to acquire and
content standards (see	2007 Edition, PreKindergarten through Grade 12	demonstrate their achievement of the knowledge and
definition ¹). The ELP standards	105	skills identified in the State's academic content
must contain language	1.2-5	standards appropriate to each grade-level/grade-band.
proficiency expectations that	K-12 English Language Development Standards	G •
reflect the language needed for	Validation 2016	Science The WHD A control of the A WHD A in the A W
ELs to acquire and demonstrate	r1.2-1	The WIDA consortium notes point out that WIDA is
their achievement of the	Alignment Between the Kentucky Core Content for	planning to do a science alignment study as part of an additional revision.
knowledge and skills identified	Assessment and the WIDA Consortium English	additional revision.
in the State's academic content	Language Proficiency Standards	Document r1.2-3 is a list of "can-do" statements; they are
standards appropriate to each grade-level/grade-band in at	Language Frontierey Standards	not the standards.
least reading/language arts,	r1.2-2	not the standards.
mathematics, and science.	Alignment Analysis of Key Practice Language	Evidence is not provided with regards to alignment to the
mathematics, and science.	Functions from the Framework for English Language	State academic content standards for science. According to
	Proficiency Development Standards corresponding to	WIDA Consortium Response (p. 3), "to date, there has not
•	the Common Core State Standards for English Language	been an alignment study between the ELPD Framework's
	Arts and Mathematics and the WIDA English Language	science key practices and the WIDA ELP Standards."
	Proficiency Standards, 2007 and 2012 Edition,	WIDA plans to conduct an alignment study in early spring,
	PreKindergarten through Grade 12; Correspondence	2021. The peers request that documentation submitted for
		this study include methods, findings, and a description of
	Analysis of Florida state Grade 12 Calculus Standards	any corrective action needed with a timeline for addressing
	and WIDA English Language Proficiency Standards	corrective action. The study should also explicitly lay out
		how independence in the alignment study was maintained

¹ see page 24 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

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	r.1.2-3	(given the alignment study will be conducted by an
	WIDA Can Do Descriptors, Key Uses Edition, Grades	affiliated organization - WCEPS).
		If the planned alignment study examines the relationship between the language requirements of NGSS and the ELP WIDA standards this would provide evidence for those states that have adopted NGSS. States that have not adopted NGSS would need to do an additional alignment
		study. Documentation of required alignment for non-NGS consortia members must be provided.
		Document r1.2-2 shows evidence of an alignment study between the key practice language functions (recount, explain, argue, discuss) from the ELPD Framework's English Language Arts and Mathematics and the WIDA ELP Standards. Results were not encouraging, particularly for pre-K to grade 2. In general, across all ELA and mathematics practices and all clusters, a majority of the DOK and range of knowledge acceptability findings did not meet the criterion of 75% (pp. 6-7).
		It concerns the peers that the alignment studies, the standards for ELP and the content standards are all from varying in years. Also, if a state is not using clear base CCSS, the provided evidence does not respond to the critical element (CE). To clarify: the peers would like to see documentation that the current WIDA standards are: 1 aligned in all areas as required to the current CCSS. 2) eac state must provide evidence either of using the version of CCSS that WIDA has provided alignment evidence to support, OR evidence of alignment to the current standards being used by the state.
		States will need to provide evidence of either using the version of CCSS that WIDA has provided alignment evidence to support or evidence of alignment to the standards being used by the state.

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
Section 1.2 Summary Statement		
No additional evidence is required or		
X_ The following additional evidence is not the peers are once again asking for the same	needed/provide brief rationale: e evidence that was previously requested because evidence	was not found that addressed the previous request.
for English Learners (ELs) to acqui appropriate to each grade-level/gra	de-band. und mathematics, evidence of alignment of its current ELP s	e proficiency expectations that reflect the language needed d skills identified in the State's academic content standards standards to the State's academic content standards, including

Critical Element 1.3 – Required Assessments

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State's assessment system includes an <i>annual general and alternate ELP assessment</i> (aligned with State ELP standards) administered to: • All ELs in grades K-12.	Reviewed by Department Staff Only	Reviewed by Department Staff Only
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 reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
• The State has policies that require the inclusion of all public elementary and secondary ELs in the State's ELP assessment, including ELs with disabilities.	Reviewed by Department Staff Only	Reviewed by Department Staff Only
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 reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
If the State has developed or amended challenging <i>ELP</i> 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.	Reviewed by Department Staff Only	Reviewed by Department Staff Only
Section 1.5 Summary Statement		
No additional evidence is required or		

SECTION 2: ASSESSMENT SYSTEM OPERATIONS Critical Element 2.1 – Test Design and Development

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	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	2.1-1 ACCESS for ELLs® 2.0 Spring 2017 Interpretive Guide for Score Reports	The blue text is the additional evidence requested by previous peer reviewers.
 assessments to the depth and breadth of the State's ELP standards, and includes: Statement(s) of the purposes of the assessments and the intended interpretations and uses of results; Test blueprints that describe the structure of each assessment in sufficient detail to support the 	2.1-2 Annual Technical Report for ACCESS for ELLs® 2.0 Online English Language Proficiency Test, Series 401, 2016–2017 Administration 2.1-3 Alternate ACCESS for ELLs Spring 2017 Interpretive	• Evidence that both assessments are aligned to the depth and breadth of the State's ELP standards, including: o Statement of the purposes and intended uses of results. o Test blueprints. o Processes to ensure that the ELP assessment is tailored to the knowledge and skills included in the State's ELP
development of assessments that are technically sound, measure the depth and breadth of <i>the State's ELP standards</i> , and support the intended interpretations and uses of the results.	Guide for Score Reports 2.1-4 Annual Technical Report for ALTERNATE ACCESS for ELLs® English Language Proficiency Test, Series 103, 2015–2016 Administration 2.2-8 Alternate ACCESS Form 100 Test Specifications	standards and reflects appropriate inclusion of the range of complexity found in the standards (e.g., detail about the routing rules, detail of the item selection process for paper forms to ensure it adheres to the blueprint). General statements of the purposes and intended uses of
 Processes to ensure that the ELP assessment is tailored to the knowledge and skills included in the State's ELP standards and reflects appropriate inclusion of the range of complexity found in the standards. 	r2.1-1 Summary of ACCESS 2.0 Online Field Testing for Series 403 Listening and Reading r2.1-2	results for ACCESS and Alternate ACCESS is found in documents 2.1-1 (p.3 & 7-12) and 2.1-2 (p. 5); however, specific details like determinations of levels and the meaning and purpose of the levels are not provided. Identification of students who have attained EL proficiency
If the State administers computer- adaptive assessments, the item pool and item selection procedures adequately support the test design and intended uses and interpretations	r2.1-3 Folder Selection Graphs Reading 501	(exit decisions) are mentioned in the technical report (2.2-1), but the description of the purpose does not include the richness of how this assessment is being used in the field provision of services, accommodations decision, etc.)
 of results. If the State administers a computer-adaptive assessment, it makes proficiency determinations with respect to the grade in which the 	r2.1-4 ACCESS for ELLs Series 402 Online Reading & Listening Item Difficulty Visualizations	WIDA needs to provide more structure with regard to usage and intended purposes. The original peer notes state: "Because decision rules vary by state, states will need to address how the scores are used and interpreted for their students." It is still unclear how the states address this.
student is enrolled and uses that	ACCESS for ELLs 2.0 Assessment Proficiency Level	Document 2.1-2 (p. 22) describes a process to create test

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	Scores Standard Setting Project Report	maps and blueprints to ensure that all folders are aligned to the proper WIDA Standard and properly organized by WIDA Standard and tier in the test maps. The peers did not find a clear test blueprint that specified how the assessment is constructed to represent the breadth and depth of the
entirely administered through a portfolio.		As specified in the critical element, the blueprints should support the intended interpretations and uses of the results. The current evidence does not support how the test is constructed with regard to the 8 scores on the student reports.
		Typically, minimum/maximum number of items in each standard/subdomain is included in the blueprint.
		It was unclear how the five standards are taken and turned into the four subscales.
		The issues identified by the peers were the same for ACCESS and Alternate ACCESS. Additionally, there were two issues identified below for ACCESS.
		For ACCESS:
		• Evidence that the item pool and item selection procedures adequately support the multi-stage adaptive administrations.
		R2.1-1 there is not an explanation for or justification of the negative item difficulties on stage 7. For example, Reading Grades 2-3 Stage 9 has a higher average item difficulty than Stage 10. Another example is item 28 stated item difficulty is out of the typical range. Peers had questions as to the average item difficulty across stages and grade spans. The submitted evidence requires more explanation to allow the peers to understand if the submitted evidence meets the critical element.

R2.1-2 and r2.1-3 indicate that the tiers represent increasing levels of difficulty and provide information on how folders are replaced. There is no indication of the sufficiency of the item pool to support the multi-tiered selection process. • Evidence that proficiency determinations are made with respect to the grade in which the student is enrolled. Document r.2.1-5 (pp. 32-40) provides evidence that proficiency determinations are made on vertically-equated scale scores that take into account the grade in which the student is enrolled, but the document does not contain a firm positive statement that determinations are based on grade when grade banding is used for this assessment. This critical element also indicates that all reporting must also be by assigned grade. The use of grade bands may create overly ambitious language demands at the lowest grade level in the band, and be too low at the highest grade level in the band. If state academic content standards are graded, then the language demands would also be graded, which would make it difficult to show alignment between the content standards and the assessment.

Section 2.1 Summary Statement

____ No additional evidence is required or

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

For ACCESS and the Alternate ACCESS:

- Evidence that both assessments are aligned to the depth and breadth of the State's ELP standards, including:
- o Statement of the purposes and intended uses of results.
- o Test blueprints.
- o Processes to ensure that the ELP assessment is tailored to the knowledge and skills included in the State's ELP standards and reflects appropriate inclusion of the range of complexity found in the standards (e.g., detail about the routing rules, detail of the item selection process for paper forms to ensure it adheres to the blueprint).

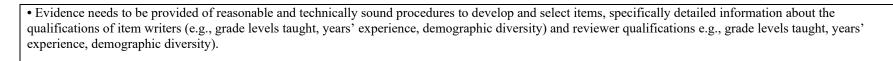
For ACCESS:

- Evidence that the item pool and item selection procedures adequately support the multi-stage adaptive administrations.
- Evidence that proficiency determinations are made with respect to the grade in which the student is enrolled.

Critical Element 2.2 – Item Development

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
The State uses reasonable and technically sound procedures to develop and select items to: • Assess student English language proficiency based on the <i>State's ELP standards</i> in terms of content and language processes.	2.2-2 The ASSETS Consortium English Language Proficiency Assessment for Grades 1-12 2.2-3 ACCESS Test Development Cycle 2.2-11 Item Writing Handbook for ACCESS for ELLs 2.0® Listening and Reading Assessments r2.2-1 ACCESS for ELLs® Test Development Cycle r2.2-2 WIDA-ACCESS Test Development Team	The blue text is the additional evidence requested by previous peer reviewers. For ACCESS: • Evidence of reasonable and technically sound procedures to develop and select items (e.g., timeline of development, qualifications of item writers, item-writing training, item review processes and reviewer qualifications, field test processes for each domain, and technical advisory committee (TAC) review). Document 2.2-2 (pp. 14-21) provides evidence of test design principles, including simplicity and consistency, construct fidelity, age-level appropriateness, bias and sensitivity, accessibility. Document 2.2-11 provides guidance to external item writers on developing Listening and Reading items for ACCESS. R2.2-2 gives minimum qualifications but does not give evidence of the qualifications of the ACTUAL item writers. Document r2.2-1 provides information on the procedures to develop and select items as part of the annual plan for operational item refreshment. The section on Item Writing provides evidence that only individuals who have successfully completed item writing training are selected to write items. Items undergo a multi-step process that includes reviews regarding content and cognitive complexity alignment, sensitivity and fairness, and field testing (pp. 9-10). WIDA's ACCESS for ELLs Technical Advisory Committee (TAC) provides support, reviews all test-related technical reports, and advises on the psychometric issues of testing and any proposed policy changes with psychometric implications. (p. 36).

	Though some information is provided in the previously described document, and although the selected item writers are typically current teachers in WIDA Consortium states (r2.2-1, p. 9), the provided documentation does not meet the request. What are the grade levels of the teachers? How many years of experience do they have? What content do these teachers teach? Do these teachers have experience with EL students? What is the demographic diversity of the recruited teachers?. For Alternate ACCESS: • Evidence of reasonable and technically sound procedures to develop and select items to assess ELP (e.g., involvement of experts with knowledge of ELs with significant cognitive disabilities). Evidence was not found by the peers which indicated whether experts with knowledge of ELs with significant cognitive disabilities were included in item development. The WIDA response (p. 9) states that WIDA does not refresh Alternate ACCESS items annually. The items were first operationally administered in 2014 and have been used annually since that year. WIDA notes that item development and test specs are in revision. WIDA is planning "an initial draft of new item development materials" for July of 2021. Upon resubmission, the draft should be submitted to the Department for review.
Section 2.2 Summary Statement	
No additional evidence is required or	
X_ The following additional evidence is needed/provide brief rationale:	
For ACCESS:	



For Alternate ACCESS:

• Evidence of reasonable and technically sound procedures to develop and select items to assess ELP (e.g., involvement of experts with knowledge of ELs with significant cognitive disabilities, grade levels taught, years' experience, demographic diversity).

Critical Element 2.3 – Test Administration

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
The State implements policies and procedures for standardized test administration; 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.	2.3-1 ACCESS for ELLs® 2.0 2016-2017 Test Administrator Manual r2.3-1 ACCESS for ELLs 2.0 Overview for Test Coordinators r2.3-2 Technology User Guide	The blue text is the additional evidence requested by previous peer reviewers. For ACCESS and Alternate ACCESS: • Evidence of established communication to educators of clear, thorough and consistent standardized procedures for the administration of its assessments, including administration with accommodations (e.g., guidelines or recommended qualifications of test administrators including volunteers, training of volunteers, and qualifications and training for the human providers of accommodations). 2.3-1 provides evidence for the dissemination and implementation of standardized test administration policies and procedures to familiarize Test Coordinators with the components of the ACCESS (pp. 1-139) Document r2.3-1 provides evidence of procedures to familiarize Test Coordinators with the components of the ACCESS for ELLs 2.0 test, Training Requirements and Resources, Test Preparation Resources, and Coordinating the Grades 1-12 online and paper tests. The peers did not find evidence regarding guidelines for individuals who are actually administering the assessment and for individuals who provide accommodations. 2.3-1 (p. 11) indicates that all test administrators must complete training, but the peers did not find the requirements for test administrators or the accommodation providers (e.g., Must the individuals be certified? . Can other school staff be used?non-employees or

	volunteers). If this varies by state, each state should provide evidence regarding who can administer the assessment and provide accommodations.
	The peers did not find information about whether volunteers are allowed (the peers DO NOT recommend the use of volunteers); but, if they are allowed, information needs to be provided about how communication is provided for them.
	• Evidence of established procedures to ensure that general and special education teachers, paraprofessionals, teachers of ELs, specialized instruction 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 (e.g., content of training modules, evidence that training is required for test administrators and evidence of participation in such training).
	2.3-1 provides evidence of standardized test administration policies and procedures to familiarize Test Coordinators with the components of the ACCESS and Alternate ACCESS (pp. 140-165). The peers did not find evidence regarding how the consortia ensures that the individuals who administer the assessment are properly trained (e.g., training rosters, percentage of test administrators who were properly trained, a description of the process for reviewing the training of the test administrators), as well as a plan for addressing any issues identified.
	For ACCESS: Evidence of established contingency plans to address possible technology challenges during test administration.
Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily	R2.4-1 is a troubleshooting guide that helps, but it does not reflect the final set of additional evidence, if any, that a

		provide the level guidance necessary to ensure smooth continuance in the event of a technology issue (e.g., when computer locks up, power flashes off, etc.). No evidence of specific procedures is provided for catastrophic disruptions of online testing, such as power outages, fire, storms, death, etc., or what to do in the case of online pauses, loss of Internet connectivity, and other disruptions.
Section 2.3 Summary Statement		
No additional evidence is required or		
_X The following additional evidence is needed/provide brief rationale:		
For ACCESS and Alternate ACCESS:		
• Evidence of established communication to educators of clear, thorough and consistent standardized procedures for the administration of its assessments, including administration with accommodations (e.g., guidelines or recommended qualifications of test administrators including volunteers if used, training of volunteers if used, and qualifications and training for the human providers of accommodations).		
• Evidence of established procedures to ensure that general and special education teachers, paraprofessionals, teachers of ELs, specialized instruction 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 (e.g., content of training modules, evidence that training is required for test administrators and evidence of participation in such training).		
For ACCESS: Evidence of established comprehensive contingency plans to address possible technology challenges and other catastrophic events during test administration.		

Critical Element 2.4 – Monitoring Test Administration

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Citical Element	reference)	State Documentation or Evidence
The State adequately monitors the	Reviewed by Department Staff Only	Reviewed by Department Staff Only
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 ELP assessments and the AELPA.		
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 reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State has implemented and documented an appropriate set of policies and procedures to prevent test irregularities and ensure the integrity of test results through: • 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 the general ELP assessments and the AELPA.	2.3-7 2018-2019 Test Policy Handbook for State Education Agencies r2.5-1 Caveon Web Patrol Health Check and Key Insights r2.5-2 Caveon Test Security Audit Report for WIDA r2.5-3 Caveon Data Forensics Report r2.5-4 WIDA Psychometric Research Plan on Data Forensics	The blue text is the additional evidence requested by previous peer reviewers. For ACCESS and Alternate ACCESS: • Evidence of policies and procedures that prevent 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. o Specifically, evidence for Alternate ACCESS of policies and procedures to protect the integrity of the test given that the test form is unchanged for the past several years. • Evidence of detection of test irregularities. • Evidence of remediation following any test security incidents. • Evidence of the investigation of alleged or factual test irregularities (e.g., forensic analysis and plans to address concerns). WIDA has contracted the services of a test security vendor (Caveon) to help prevent test irregularities and ensure the integrity of test results. Evidence is not provided that the Caveon services and audits included the Alternate ACCESS. It is good that WIDA has contracted with a test security organization. However, security audits and the other submitted evidence do not address this critical element. This critical element requires evidence of "policies and

	procedures"
	procedures
	Caveon has conducted a number of test and security audits, including a security audit of the assessment cycle from item development to score reporting (r2.5-2) and a data forensics analysis of student and test data for the 2019-2020 assessment year (r.2.5-3). There have been no widespread security breaches, though findings from this analysis identified security anomalies in one district and three states.
	The peers routinely see policies that require item developers to sign a confidentiality agreement, and an example of this confidentiality agreement is often included in submitted evidence. Also, routinely the peers see policies and procedures stating the consequences and actions taken when a test security violation occurs. Typical test maintenance involves monitoring of item drift that could indicate a security breech. Follow-up procedures were not described when security breaches were found.
	WIDA has plans to continue web security and data forensic analyses with this vendor in 2021 (r2.5-4). It is unclear how WIDA works with the states on the follow-up investigation and how this is communicated to the states. It would be helpful to see updated Test Policy Handbook for State Education Agencies (2.3-7). Also, an SOW or plan for how data forensics will be handled would be important. This documentation would include requirements for training (e.g., yearly). The peers would like to see established test security policies and procedures.
Section 2.5 Summary Statement	
No additional evidence is required or	
X_ The following additional evidence is needed/provide brief rationale:	
For ACCESS and Alternate ACCESS:	

- Evidence of policies and procedures that prevent 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.
 - o Specifically, evidence for Alternate ACCESS of policies and procedures to protect the integrity of the test given that the test form is unchanged for the past several years.
- Evidence of detection of test irregularities (e.g., failure to provide accommodations, documentation of how test irregularities are reported).
- Evidence of remediation following any test security incidents.
- Evidence of the investigation of alleged or factual test irregularities.

Critical Element 2.6 – Systems for Protecting Data Integrity and Privacy

	are being created, what are the technical methods being used to ensure the person accessing is the actual authorized user? This peer panel is not rendering judgement on minimum n-size. This will be addressed by the individual states in the consortium.	
Section 2.6 Summary Statement		
No additional evidence is required or		
X_ The following additional evidence is needed/provide brief rationale:		
For ACCESS and Alternate ACCESS:		
• Policies and procedures to protect the integrity of test-related data in test administration (e.g., how data are protected by all parties, including during handoffs).		
• Policies and procedures to maintain secure student-level data that protect student privacy and confidentiality (e.g., guidelines for districts and schools).		

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	r3.1-1 Executive Committee Notes – 3/3/20	The blue text is the additional evidence requested by previous peer reviewers.
assessments consistent with nationally recognized professional and technical testing standards. The State's validity evidence includes evidence that:	r3.1-2 Alternate ACCESS and Alternate Model Performance Indicator Alignment Studies Report	For ACCESS: • Documentation of adequate alignment between the State's ELP assessment and the ELP standards
The State's ELP assessments measure the knowledge and skills specified in the State's ELP standards, including:	r3.1-3 Draft Alternate Can Do Descriptors	the assessment is designed to measure in terms of language knowledge and skills and the depth and breadth of the State's ELP standards across all proficiency levels, domains, and modalities identified therein.
 Documentation of adequate alignment between the State's ELP assessment and the ELP standards the assessment is designed to measure in terms of language knowledge and skills, the depth and breadth of the State's ELP standards, across all proficiency levels, domains, and modalities identified therein; Documentation of alignment (as defined) between the State's ELP standards and the language demands 		 Documentation of alignment between the State's ELP standards and the language demands implied by, or explicitly stated in, the State's academic content standards. Due to the pandemic, planned alignment studies have not yet taken place. r3.1-1 (p. 5) provides evidence of alignment studies tentatively set for the spring/summer of 2021, including an alignment study of the: online and paper versions of ACCESS to the WIDA 2007 and 2012 ELP Standards WIDA Standards to State Content Standards
 implied by, or explicitly stated in, the State's academic content standards; If the State administers an AELPA aligned with alternate ELP achievement standards, the assessment shows adequate linkage to the State's ELP standards in terms of content match (i.e., no unrelated content) and that the breadth of content and linguistic complexity 		The proposed alignment study only appears to address part of the issues found in the original peer review. The proposed study should give evidence of alignment between the assessment and the consortium's developed standards, there is no guarantee the state has adopted the WIDA standards as their ELP standards. Caution must be used to ensure that the alignment study applies to the state when being considered during a state review. Consideration must be given to states that have modified CCSS as their content standards to ensure the ELP standards meet the language

determined in test design is	demands of the adopted state content standards.
appropriate for ELs who are students	
with the most significant cognitive disabilities.	Documentation should also be provided that explicitly lays out how independence in the alignment study was maintained (given the alignment study will be conducted by an affiliated organization - WCEPS).
	For Alternate ACCESS: • Evidence of adequate linkage to the State's ELP standards in terms of content match (i.e., no unrelated content) and that the breadth of content and linguistic complexity determined in test design is appropriate for ELs who are students with the most significant cognitive disabilities
	The alignment between the alternate assessment, and the 2007 and 2012 standards gives a lot of flex in the alignment since the consortium is not clearly stating a single set of standards. It is also worthy of note that the newest of those standards were updated 8 years ago.
	R3.1-2 documents the alignment study conducted between 1) the Alternate ACCESS and the Model performance indicators and 2) the alternate (APIs) and model performance indicators (MPIs). Page 11 in the summary provides the criteria for the study. On page 26, there is a discussion of the findings. Specifically, none of the alt ACCESS assessments include writing tasks related to the math strand. It seems like this is an alignment issue if the assessment is supposed to measure all the standards across the language proficiency levels. Results were mixed (pp. 24-26). For example, the alignment study found that "the Alternate ACCESS was "acceptably aligned," to WIDA's AMPIs", while the linking study "did not identify AMPIs linked to WIDA's language of Social Studies Standards." Results will be used to support ongoing maintenance and new Alternate ACCESS item development (p. 26).
	Document r3.1-3 provides evidence of draft Alternate Can

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.

Do Descriptors created at a 2019 WIDA's national,

	invitational meeting to support educators in the instruction of ELs with the most significant cognitive disabilities. Page 16 of the WIDA Consortium Response states that this "work is also being used to both update WIDA's original AMPIs, including expectations in the area of the language of Social Studies, and to support new AMPI development." Providing the list of can-do descriptors does not support the validity of them. It would be helpful to see more specifics such as a timeline for when these findings will be addressed and details about how a stakeholder discussion would be conducted around the acceptability of "current item limitations and variation"
	by grade" (p. 26).
	Note: USDOE specifies that the alignment study is independent. R3.1-2 (Table 6, p. 6) indicates that WIDA staff facilitated the panels even though on page 24, it states that facilitators didn't participate in ratings/discussions In future alignment studies, provide clarity regarding how independence was ensured.
	As WIDA moves forward with the redesign processes, the consortia should be cognizant of the impact on alignment.
Section 3.1 Summary Statement	
No additional evidence is required or	
X_ The following additional evidence is needed/provide brief ration	ale:
For ACCESS:	
• Documentation of adequate alignment between the State's current FI	Passessment and the current FLP standards the assessment is designed to measure in terms of

- Documentation of adequate alignment between the State's current ELP assessment and the current ELP standards the assessment is designed to measure in terms of language knowledge and skills and the depth and breadth of the State's ELP standards across all proficiency levels, domains, and modalities identified therein.
- Documentation of alignment between the State's current ELP standards and the language demands implied by, or explicitly stated in, the State's current academic content standards.

For Alternate ACCESS:

• Evidence of adequate linkage to the State's ELP standards in terms of content match (i.e., no unrelated content) and that the breadth of content and linguistic

st design is appropriate			

Critical Element 3.2 – Validity Based on Linguistic Processes

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 its assessments tap <i>the intended language processes</i> appropriate for each grade level/gradeband as represented in the State's ELP standards.	2.1-2 Annual Technical Report for ACCESS for ELLs® 2.0 Online English Language Proficiency Test, Series 401, 2016–2017 Administration r2.2-1 ACCESS for ELLs® Test Development Cycle	The blue text is the additional evidence requested by previous peer reviewers. For ACCESS and Alternate ACCESS: • Adequate validity evidence that its assessments tap the intended language processes appropriate for each grade level/grade-band as represented in the State's ELP standards.
	r2.2-2 WIDA-ACCESS Test Development Team	ACCESS The provided evidence does not address the requests from the original peer review. The evidence does not support the assertion that the assessment taps the intended linguistic processes for each grade or grade cluster. While document r2.2-1 (p. 9, pp. 11-12) provides evidence of procedures associated with the test development cycle to ensure that ACCESS content is appropriate to each grade-level cluster, and document r2.2-2 identifies experience working with ELs as a requisite for some positions in the test development team, there is no specific evidence in these documents about actual procedures or expertise designed to evaluate the linguistic complexity of the vocabulary, graphics and other content features of an item that could impact the measurement of the intended language processes. The peers were concerned that language development experts appear not to have been included in the panel making expert judgment. The peers suggest being explicit between how the items are reviewed and who does the review process. The reviewers' judgement as to the language process being demonstrated should also be captured.
		Alternate ACCESS

	Evidence for this CE needs to be provided for the Alternate ACCESS. It was unclear how evidence provided applies to the Alternate ACCESS.
Section 3.2 Summary Statement	
No additional evidence is required or	
X_ The following additional evidence is needed/provide brief rationale:	
For ACCESS and Alternate ACCESS: • Adequate validity evidence that its assessments tap the intended language processes appropriate for eastandards.	ach grade level/grade-band as represented in the State's ELP

Critical Element 3.3 – Validity Based on Internal Structure

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 validity evidence that the scoring and	3.1-10 Exploring Domain-General and Domain-Specific Linguistic Knowledge in the Assessment of Academic	The blue text is the additional evidence requested by previous peer reviewers.
reporting structures of its assessments are consistent with the sub-domain structures of the State's <i>ELP standards</i> on which	English Language Proficiency	For ACCESS and Alternate ACCESS:
the intended interpretations and uses of results are based.	3.3-1 ACCESS for ELLs 2.0 Construct Validity Study	• Evidence that the scoring and reporting structures of the assessments are consistent with the subdomain structures of
	6.2-1 WIDA Consortium Report on 2016-2018 Boxplot	the State's ELP standards (e.g., an explanation of how the included statistical analyses relate to the validity framework for the assessments).
	Analyses Results	The studies in R3.3-1 and 3.3-1 are appreciated and do
	r.3.3-1	explore the higher-level structures. The CE requires
	Alternate ACCESS for ELLs (Alt-ACCESS)	evidence that the 4 domains being scored are separate
	Construct Validity Study	domains and not repeatedly scoring the same domain or a significantly overlapping domain multiple times. The
		structural equation models (SEM) analysis presented does not clearly speak to the issue and does not provide an
		explanation of how the study is evidence of 4 separate
		domains scored separately in the 4 sub-scores. The exploratory factor analysis indicates the presence of one
		strong factor with some overlap between the next two factors. The reporting and use of subscores for instructional
		decisions is not supported by the evidence provided.

Section 3.3 Summary Statement

____ No additional evidence is required or

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

For ACCESS and Alternate ACCESS:

• Evidence that the scoring and reporting structures of the assessments are consistent with the subdomain structures of the State's ELP standards (e.g., an explanation of how the included statistical analyses relate to the validity framework for the assessments).

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
Citical Dement	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.	3.4-8 The Bridge Study between Tests of English Language Proficiency and ACCESS for ELLs®	The blue text is the additional evidence requested by previous peer reviewers. For ACCESS and Alternate ACCESS:
with other variables.	3.4-9 Intersections: Applied Linguistics as a Meeting Place	• Adequate validity evidence that the State's assessment scores are related as expected with other variables.
	r3.4-1 Examining the relationship between the WIDA Screener and ACCESS for ELLs assessments	ACCESS The new study (r3.4-1) was helpful and provides evidence of relationships between ACCESS and the WIDA screener.
		It provides evidence that scores on Screener provide an initial measure of a student's academic English language proficiency (p. 5), are strongly predictive of ACCESS scores.
		3.4-8 provides limited evidence and predates the current WIDA assessment (study date is 2006).
		3.4-9 (page 220) shows the results of a structural equation model (SEM) indicating relationships to math achievement (criterion validity). This relationship could indicate a problematic issue with the measure because high correlations between varying disciplines could indicate measuring the wrong construct. Year of study is unknown. Because WIDA has gone through so many iterations of its standards, it was difficult to know which set of standards was being studied.
		Studies showing how the ACCESS scores are correlated to screener scores or other EL assessments does not provide the necessary evidence. The evidence needs to show that students who score higher on ACCESS also perform better on (for example) state ELA content assessments. The

• Adequate validity evidence that the State' linguistic measures).	s assessment scores are related as expected with other variab	oles (e.g., relationship between ACCESS scores and other
For ACCESS and Alternate ACCESS:		
_X The following additional evidence is	needed/provide brief rationale:	
No additional evidence is required or		
Section 3.4 Summary Statement	1	ı
		Alternate ACCESS No evidence was submitted for this type of validity for the Alternate ACCESS.
		Like many CE's this evidence is easier to provide and develop if there is a strong relationship between the assessments, the content standards, and a Theory of Action. This relationship becomes the foundation for the validity argument (theory).
		studies need to be performed using a current set of the assessments. The point of this CE is to provide valid evidence supporting the assertion that the ACCESS assessments are measuring the ELP constructs in ways that impact student performance on related measures.

SECTION 4: TECHNICAL QUALITY - OTHER

Critical Element 4.1 – Reliability

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State has documented adequate reliability evidence for its assessments for	2.1-2 Annual Technical Report for ACCESS for ELLs® 2.0	The blue text is the additional evidence requested by previous peer reviewers.
the following measures of reliability for the State's student population overall and	Online English Language Proficiency Test, Series 401, 2016–2017 Administration	For ACCESS and Alternate ACCESS:
each student group consistent with nationally recognized professional and	2.1-4 Annual Technical Report for ALTERNATE ACCESS	• Evidence of test reliability, including: o Reliability by subgroups;
technical testing standards. If the State's assessments are implemented in multiple States, measures of reliability for the	for ELLs® English Language Proficiency Test, Series 103, 2015–2016 Administration	o Consistency and accuracy of estimates in categorical classification decisions for the cut scores, achievement
assessment overall and each student group consistent with nationally recognized	2.1-5 Annual Technical Report for ACCESS for ELLs® 2.0	levels or proficiency levels based on the assessment results; o Evidence that reliability statistics are used to inform
professional and technical testing standards, including: Test reliability of the State's	Paper English Language Proficiency Test, Series 401, 2016–2017 Administration	ongoing maintenance and development.
assessments estimated for its student population (for ELP assessments, including any domain or component sub-tests, as applicable);	2.1-6 Annual Technical Report for ALTERNATE ACCESS for ELLs® English Language Proficiency Test, Series	For ACCESS, WIDA's latest editions of the Annual Technical Report (2018-2019) provides evidence of subgroup test reliability by gender, ethnicity and IEP status
Overall and conditional standard error of measurement of the State's assessments, including any domain or	403, 2018–2019 Administration r4.1-1 Annual Technical Report for ACCESS for ELLs® 2.0	for the online test (r4.1-2, pp. 2-289 to 2-295) and the paper test (r4.1-4, pp. 2-411 to 2-418). The peers would recommend looking at reliability by home language and SES.
 component sub-tests, as applicable; Consistency and accuracy of estimates in categorical classification 	Paper English Language Proficiency Test, Series 403, 2018–2019 Administration	For ACCESS, WIDA's latest editions of the Annual Technical Report (2018-2019) provides a) evidence of
decisions for the cut scores, achievement levels or proficiency levels based on the assessment	r4.1-5 Annual Technical Report for ALTERNATE ACCESS for ELLs® English Language Proficiency Test,	overall indices related to the accuracy and consistency of classification, as well as Cohen's kappa; b) accuracy and consistency information conditional on proficiency level,
results; • For computer-adaptive tests, evidence that the assessments	Series 403, 2018-2019 Administration	and c) indices of classification accuracy, including the false-positives and the false-negatives, and consistency at
produce test forms with adequately precise estimates of <i>an EL's English proficiency</i> .	r4.1-6 Using Multistage Testing to Enhance Measurement of an English Language	the cut points for the online test (r4.1-2, pp. 2-316 to 2-341, and the paper test (r4.1-4, pp. 2-437 to 2-466).

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Diement	reference)	State Documentation or Evidence
	Proficiency Test	WIDA's latest editions of the Annual Technical Report
		(2018-2019) provides evidence of test information function
	r4.1-7	(TIF) curves to inform item selection and forms creation to
	Figures for Using Multistage Testing to Enhance	target each test form to the intended proficiency levels for
	Measurement of an English Language	the online test (r4.1-2, pp. 2-263 to 2-286) and for the paper
	Proficiency Test	test (r4.1-4, pp. 2-369 to 2-408). However, the provided
		TIF curves for writing call many assumptions about the
		assessment into question. The almost bimodal nature is not normally seen in a well-functioning assessment. These
		same concerns are repeated for Speaking. Additionally, the
		cut scores for the speaking preA are so far away from the
		area of high accuracy that it calls into question the
		usefulness of the preA speaking assessment.
		and the second s
		The issue is that the TIFs show that the test is information
		function is not always highest at the upper levels of the PLs
		see r4.1-2 page 277-279). Also, accuracy and consistency
		measures for some composite scores and domains appeared
		low (see for example r4.1-2 p. 2-138).
		The provided evidence does not fulfill the request from the
		initial peer review and does not support the assertion that the assessments being reviewed met this CE.
		the assessments being reviewed met this CE.
		• For computer-adaptive tests, evidence that the
		assessments produce test forms with adequately precise
		estimates of an EL's ELP.
		A constitute of a William of the constitute of t
		According to the WIDA submission notes: "Each year in
		April and May, WIDA and its test development vendor (Center for Applied
		Linguistics) establish an annual refreshment
		plan for ACCESS for ELLs. The purpose of this
		plan is to identify slots within the multi-stage
		adaptive design where new folders of items and
		tasks should be developed. WIDA commits to
		consistently target high PL Listening items over
Consistent with the note on page	e 1, the evidence requested by the peer reviewers does not necessaril	

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
		the course of the next two to three years, until
		the gaps in the item pool are filled. This plan will
		assist in deepening the pool of items that
		appropriately target PLs 5 and 6 on Listening." The peers
		would like to see evidence that items at the various levels
		were actually produced and put into the bank.
		For Alternate ACCESS:
		• Evidence of reliability, including test information
		functions (TIFs) for overall composite scores.
		R4.1-5 provides TIFs for the alternate ACCESS but the
		results were not compelling as evidence of the reliability of
		the assessment. In particular, peers noted that the cut score
		are not in typical locations for a TIF curve. Further
		explanation or an action plan would be needed for this
		evidence to become sufficient.
		D415
		R4.1-5 provides TIFs for the four domains but not for the
		overall test. The peers would like to see this evidence.

Section 4.1 Summary Statement

No additional evidence is required or

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

For ACCESS and Alternate ACCESS:

- Evidence of test reliability, including:
- o Acceptable consistency and accuracy of estimates in categorical classification decisions for the cut scores, achievement levels or proficiency levels based on the assessment results, or a plan to improve the consistency and accuracy;
- o Evidence that reliability statistics are used to inform ongoing maintenance and development.

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
For ACCESS:		
• For computer-adaptive tests, evidence that the assessments produce test forms with adequately precise estimates of an EL's ELP.		
For Alternate ACCESS:		
• Evidence of reliability, including test information functions (TIFs) for overall composite scores.		

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 ELP assessments, assessments should be developed, to the	2.1-4 Annual Technical Report for ALTERNATE ACCESS for ELLs® English Language Proficiency Test, Series	The blue text is the additional evidence requested by previous peer reviewers.
extent practicable, using the principles of universal design for learning (UDL) (see definition ²).	103, 2015–2016 Administration	For ACCESS and Alternate ACCESS:
definition).	2.2-16	• Evidence that the assessments are accessible to all
	Accessibility and Accommodations Supplement	students and fair across student groups in design,
For ELP assessments, the State has taken reasonable and appropriate steps to ensure	2.3-1	development, and analysis (e.g., the implementation of universal design principles, to the extent practicable, during
that its assessments are accessible to all	ACCESS for ELLs® 2.0 2016-2017 Test	item development and review, and additional differential
EL students and fair across student groups, including ELs with disabilities, in	Administrator Manual	item functioning (DIF) analyses to include more student subgroups).
their design, development, and analysis.	r4.2-1	
their design, development, and analysis.	Bias Review Checklist	Documents r4.2-3 (reading and listening only) and r4.1-5 provide evidence of evaluation bias through DIF analysis
	r4.2-2	of performance by gender and ethnicity (students of
	Bias & Sensitivity Review Training	Hispanic ethnic background versus students of non- Hispanic ethnic background) and impact analysis on
	r4.2-3	subgroup. Document r4.2-3 provides evidence that WIDA
	Comparison of DIF methods 10	is conducting a study on differential item functioning (DIF)
		based on disability status (i.e., IEP status) to examine
		whether the questions are biased against students with IEP
		accommodations (p. 1). It is an attempt to address fairness and accessibility for a variety of students. Study results are
		expected to be completed by February 2021.
		There is limited evidence in either the ACCESS or
		Alternate ACCESS technical manuals that DIF analyses are conducted beyond ethnicity and gender (r4.1-2 and r4.1-5).
		Document r4.1-5 provides evidence of DIF analyses to

² 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

compare the performance of students on the Alternate ACCESS by gender and ethnicity (students of Hispanic ethnic background versus students of non-Hispanic ethnic background). The focus on Hispanic students (and not additional racial/ethnic groups) is a limitation of the study. Evidence provided of bias and sensitivity review training and checklists (r4.2-1 and 2).
The peers could not find information about Universal Design during item development and review for the ACCESS or Alternate ACCESS. Nor was there in any discussion of methods used to ensure equal access of ELs with disabilities who have different needs and characteristics (r2.2-1).
The peers typically see evidence for this CE that includes the number of items flagged for bias and the results of the bias review for these items.
For Alternate ACCESS:
• Evidence that the State has taken reasonable and appropriate steps to ensure that its assessments are accessible to all EL students and fair across student groups, including Els with disabilities, in their design, development, and analysis, guidance and instructions on appropriate instructional supports that can be used during the assessment, particularly for Braille and alternate modes of communication.
Alternate ACCESS appears not to meet federal requirements. The WIDA response states that "Alternate ACCESS is not provided in Braille or any alternate mode of communication."

Section 4.2 Summary Statement
No additional evidence is required or

_X The following additional evidence is needed/provide brief rationale:
For ACCESS and Alternate ACCESS:
• Evidence that the assessments are accessible to all students and fair across student groups in design, development, and analysis (e.g., the implementation of universal design principles, to the extent practicable, during item development and review, and additional differential item functioning (DIF) analyses to include more student subgroups).
For Alternate ACCESS:
• Evidence that the State has taken reasonable and appropriate steps to ensure that its assessments are accessible to all EL students and fair across student groups, including Els with disabilities, in their design, development, and analysis, guidance and instructions on appropriate instructional supports that can be used during the assessment, particularly for Braille and alternate modes of communication.

Critical Element 4.3 – Full Performance Continuum

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Citical Element	reference)	State Documentation or Evidence
Critical Element The State has ensured that each assessment provides an adequately precise estimate of student performance across the full performance continuum for <i>ELP assessments</i> , including performance for EL students with high and low levels of English language proficiency and with different proficiency profiles across the domains of speaking, listening, reading, and writing.	` 1 0	
		(see for example r4.1-2, p. 281-286). This indicates that the tests might not be adequately measuring students across the continuum of abilities especially in higher grades (page 263 for discussion of TIF). The WIDA response for this CE referred to CE 4.1. WIDA's response to CE 4.1 does not provide sufficient evidence to support the assertion that the assessments provide adequately precise estimates of student performance across the full performance continuum. In fact, the peers are concerned that the opposite is true; the provided evidence elucidates the problems with the estimates of student performance on these assessments.
		Evidence was not provided for the Alternate ACCESS. In addition to previously requested evidence, the peers recommend that WIDA also include the remediation plan for correcting the varying inaccuracy of estimates identified in the evidence the consortium provided in responding to element 4.1.

Section 4.3 Summary Statement

No additional evidence is required or

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

For ACCESS and Alternate ACCESS:

• Evidence that each assessment provides an adequately precise estimate of student performance across the full performance continuum for ELP assessments, including performance for EL students with high and low levels of ELP.

Critical Element 4.4 - Scoring

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Citical Element	reference)	State Documentation or Evidence
The State has established and documented standardized scoring procedures and protocols for its assessments (and for ELP assessments, any applicable domain or component sub-tests) that are designed to produce reliable and meaningful results, facilitate valid score interpretations, and report assessment results in terms of the State's ELP standards. For ELP assessments, if an English learner has a disability that precludes assessment of the student in one or more of the required domains/components (listening, speaking, reading, and writing) such that there are no appropriate accommodations for the affected domain(s)/component(s), the State must provide a description of how it will ensure that the student is assessed in the remaining domain(s)/component(s) in which it is possible to assess the student, and a description of how this will occur. ³	2.3-1 ACCESS for ELLs® 2.0 2016-2017 Test Administrator Manual 4.4-7 Less Than Four Domains_ Creating an Overall Composite Score for English Learners with Individualized Education Plans r4.4-1 Alternate ACCESS for ELLs Test Administration Tutorial r4.4-2 Alternate ACCESS for ELLs™ Writing Scoring Guide r4.4-3 Maintaining Rater Reliability in Scoring ACCESS for ELLs 2.0 Paper Speaking Test	The blue text is the additional evidence requested by previous peer reviewers. For ACCESS and Alternate ACCESS: • Evidence that if an EL has a disability that precludes assessment of the student in one or more of the required domains/components (listening, speaking, reading, and writing) because there are no appropriate accommodations for the affected domain(s)/component(s), the State ensures that the student is assessed in the remaining domain(s)/component(s) in which it is possible to assess the student, including a description of how this will occur. WIDA's notes discuss states setting and applying testing policy. A paper was provided to guide states in selecting a method for creating a composite score (4.4-7) WIDA provided documentation about the scoring of the speaking test and shows the certification process for the raters (p. 4-5, r4.4-3). There was information on how states could monitor speaking scores on pages 5-6. WIDA does not monitor these scores. The application of local scoring procedures and protocols is ultimately under direction and authority of each member state. Which, if accurate, would mean that each state using the assessment needs to submit evidence of scoring procedures and protocols to meet this CE. For ACCESS:
		• Evidence of standardized scoring procedures and protocols that are designed to produce reliable and

 $^{^3}$ See full reference in regulation, 34 CFR $\$ 200.6(h)(4)(ii) (online at $\underline{\text{https://www.ecfr.gov/cgi-bin/text-idx?SID}} = 0.76168e9e7a6c5931b4549cc15547ee9\&mc=true\&node=se34.1.200_16\&rgn=div8})$

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

meaningful results, facilitate valid score interpretations, and report assessment results in terms of the State's ELP standards (e.g., evidence that the scoring of speaking items on the paper form of the test is monitored).

r4.4-3 provides evidence of standardized scoring procedures and protocols to produce reliable results and interpretation of spoken response scored in real time by the test administrator on the paper form of the ACCESS Speaking test, and that the scores are reported according to the WIDA English language proficiency standards. The procedures and protocols include quality controls for interrater reliability to ascertain how often readers are in exact, adjacent, and nonadjacent agreement with each other, ensuring that an acceptable agreement rate is maintained. WIDA considers a minimally acceptable rate of reliability to be 70% (p. 2). No evidence was provided that there was consistent monitoring of scoring of speaking items on the paper form.

As a way to verify the accuracy of scoring, it would have been helpful if WIDA had provided an example of an internal report containing daily and cumulative inter-rater reliability agreement results for the scoring of the paper form of the Speaking test. Also, evidence of invalidation of test scores that reflect improbable gains and that cannot be satisfactorily explained through changes in student populations or instruction would be helpful.

For Alternate ACCESS:

• Evidence of the implementation of standardized scoring procedures and protocols (e.g., definitions of key terms and test administration and scoring procedures).

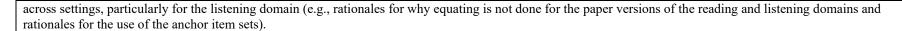
The application of local scoring procedures and protocols is ultimately under direction and authority of each member state. Which, if accurate, would mean that each state using the assessment needs to submit evidence of scoring

		procedures and protocols to meet this CE.		
Section 4.4 Summary Statement				
No additional evidence is required or				
X_ The following additional evidence is r	needed/provide brief rationale:			
For ACCESS and Alternate ACCESS:				
• Evidence that if an EL has a disability that precludes assessment of the student in one or more of the required domains/components (listening, speaking, reading, and writing) because there are no appropriate accommodations for the affected domain(s)/component(s), the State ensures that the student is assessed in the remaining domain(s)/component(s) in which it is possible to assess the student, including a description of how this will occur.				
For ACCESS:				
	res and protocols that are designed to produce reliab ement results in terms of the State's ELP standards (e	le and meaningful results, facilitate e.g., evidence that the scoring of speaking items on the paper form of		
For Alternate ACCESS:				
• Evidence of the implementation of standar	dized scoring procedures and protocols (e.g., definit	tions of key terms and test administration and scoring procedures).		

Critical Element 4.5 – Multiple Assessment Forms

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
If the State administers multiple forms of ELP assessments within or across grade-	2.1-2 Annual Technical Report for ACCESS for ELLs® 2.0	The blue text is the additional evidence requested by previous peer reviewers.
spans, ELP levels, or school years, the State ensures that all forms adequately represent the State's <i>ELP standards</i> and	Online English Language Proficiency Test, Series 401, 2016–2017 Administration	For ACCESS:
yield consistent score interpretations such	2.1-5	• Evidence that all forms adequately represent the State's
that the forms are comparable within and	Annual Technical Report for ACCESS for ELLs® 2.0	ELP standards and yield consistent score interpretations
across settings.	Paper English Language Proficiency Test, Series	such that the forms are comparable within and across
	401, 2016–2017 Administration	settings, particularly for the listening domain (e.g.,
	45.1	rationales for why equating is not done for the paper
	r4.5-1 Alternate ACCESS CDF Curves	versions of the reading and listening domains and rationales for the use of the anchor item sets).
	Alternate ACCESS CDF Curves	rationales for the use of the anchor item sets).
		Document 2.1.2 (pp. 54-56) provides evidence of a
		procedure known as common-item equating to ensure the
		comparability of results on new forms to the older forms.
		Page 29 of the WIDA Response states that when the
		"online version of ACCESS was created, the Listening
		domain test was equated with that of the paper version
		using a common-person linking method, as there were no
		common Listening items between versions in the first year
		of ACCESS Online." In the first year there were no
		Listening items, but these many years later, it would be expected that data would be provided for Listening. Since
		WIDA reports on four domains, it appears that the
		foundation of the assessment is based on the separation of
		those skills and abilities. Assuming the four domains
		represent different content, it is important to equate across
		all four domains.
		Page 29 of the WIDA Response also states that the
		"Reading domain tests were linked using anchor item sets,
		ensuring the online version of the test maintained the same
		scale as the paper version."

		The way the paper version is treated either makes it a different form or a different version. Thus, either here or in 4.6 the equating needs to be addressed to meet one or the other CE's. The grade span forms and changes by school year are not adequately addressed in the provided evidence. For Alternate ACCESS: • Evidence that all forms adequately represent the State's ELP standards and yield consistent score interpretations such that the forms are comparable within and across settings (e.g., evidence that using the same test items every year does not impact validity). r4.5-1 shows scale scores by proportions of students for each form of Alternate ACCESS. The curves do not provide evidence that the forms represent the ELP standards. WIDA provided evidence of comparability in terms of score distribution but it is not responsive to the request. It would be helpful to have the results of the linking study and a plan for equating to ensure there has not been drift over time. In short, using the same items for 7 years is normally considered a risk to validity which then calls into question the ability to provide consistent score interpretations.
Section 4.5 Summary Statement		
No additional evidence is required or		
X The following additional evidence is no	reded/provide brief rationale:	
For ACCESS:		
• Evidence that all forms adequately represe	nt the State's ELP standards and yield consistent score inter	pretations such that the forms are comparable within and



For Alternate ACCESS:

• Evidence that all forms adequately represent the State's ELP standards and yield consistent score interpretations such that the forms are comparable within and across settings (e.g., evidence that using the same test items every year does not impact validity).

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 paperbased delivery), 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.	r4.6-1 Exploring Scoring Discrepancies in ACCESS Writing Assessments: Why do handwritten responses score higher than keyboard responses? (Poster) 4.6-6 Series 400 ACCESS Paper and Online Comparability Report r4.6-2 Draft comparability report ACCESS501 effect size graph	This CE was met in the initial submission
Section 4.6 Summary Statement		
_X No additional evidence is required or The following additional evidence is no		

Critical Element 4.7 – Technical Analysis and Ongoing Maintenance

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
 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. 	2.1-4 Annual Technical Report for ALTERNATE ACCESS for ELLs® English Language Proficiency Test, Series 103, 2015–2016 Administration r1.3-1 Advancing ALTELLA: Alternate Assessment Redesign	The blue text is the additional evidence requested by previous peer reviewers. For ACCESS and Alternate ACCESS: • Evidence of adequate technical quality is made public, including on the State's website. WIDA response (p. 32) states that "each member state takes responsibility for making the technical quality of the ACCESS tests available to the public". To support this effort, WIDA provides redacted versions of the Annual Technical Report available to member states to post publicly." Documents r4.1-2 is an example of the full annual technical report for ACCESS. Document r4.1-5 is an example of the full annual technical report for Alternate ACCESS. Since WIDA is deferring this requirement to the states, the states must meet this requirement. For Alternate ACCESS: • Evidence of a system for monitoring, maintaining, and improving, as needed, the quality of its assessment system. Evidence was found that WIDA received a grant to do this, however, a grant is not going to fund the recurring cycle. Evidence could not be found in r1.3-1 that the redesign would result in a "system for monitoring, maintaining, and improving, as needed, the quality of its assessment system".

Section 4.7 Summary Statement ___ No additional evidence is required or __X__ The following additional evidence is needed/provide brief rationale: For ACCESS and Alternate ACCESS: • Evidence of adequate technical quality is made public, including on the State's website. (If WIDA is differing than states will need to meet this CE). For Alternate ACCESS: • Evidence of a system for monitoring, maintaining, and improving, as needed, the quality of its assessment system.

SECTION 5: INCLUSION OF ALL STUDENTS

Critical Element 5.1 – Procedures for Including Students with Disabilities

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State has in place procedures to ensure the inclusion of all public elementary and secondary school students ⁴ 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. • For ELP assessments, policies that require the inclusion of an EL with a disability that precludes assessment of the student in one or more of the required domains (speaking, listening, reading, and writing) such that there are no appropriate accommodations for the affected component (the State must assess the student's English language proficiency based on the remaining components in which it is possible to assess the student).	2.2-16 Accessibility and Accommodations Supplement	The blue text is the additional evidence requested by previous peer reviewers. For ACCESS and Alternate ACCESS: • Evidence of policies that require the inclusion of an EL with a disability that precludes assessment of the student in one or more of the required domains (i.e., ensuring that the student will be assessed based on the remaining components in which it is possible to assess the student Document 2.2-16 (p. 4) provides evidence of the participation expectations for all ELs with disabilities. WIDA's accessibility supplement/manual is in process of being revised. This evidence was insufficient during the previous peer review and it is still insufficient. There needs to be evidence of a clear policy requiring students to take as many domains as they are capable of participating in, and a procedure for producing an overall score based on the domains assessed. The WIDA response indicates that a revised accessibility supplement/manual will be released in Fall, 2021, but the delay caused students in 2020 to lack the inclusion that these guidelines would allow. According to WIDA response (p. 26), "Alternate ACCESS is not provided in Braille or any alternate mode of communication." Evidence was not sufficient to meet this CE.

⁴ For ELP peer review, this refers to ELs with disabilities.

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	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
Section 5.1 Summary Statement		
No additional evidence is required or		
X The following additional evidence is needed/provide brief rationale: For ACCESS and Alternate ACCESS:		
	nclusion of an EL with a disability that precludes assessmented based on the remaining components in which it is possible.	nt of the student in one or more of the required domains (i.e., le to assess the student.

Critical Element 5.2 – DOES NOT APPLY to ELP Assessment Peer Review

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
 Note: This critical element does not apply to ELP assessments, as the requirements only apply to the inclusion of ELs in <u>academic</u> <u>assessments</u>. 		
Section 5.2 Summary Statement		
No additional evidence is required or		
The following additional evidence is ne • [list additional evidence needed w/		

Critical Element 5.3 – Accommodations

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State makes available appropriate accommodations and ensures that its assessments are accessible to students with disabilities and ELs, including ELs with disabilities. Specifically, the State: • 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,	2.1-4 Annual Technical Report for ALTERNATE ACCESS for ELLs® English Language Proficiency Test, Series 103, 2015–2016 Administration 2.2-16 Accessibility and Accommodations Supplement 2.2-17 The WIDA Accessibility and Accommodations Framework 2.3-1 ACCESS for ELLs® 2.0 2016-2017 Test	The blue text is the additional evidence requested by previous peer reviewers. For ACCESS and Alternate ACCESS: • Evidence that the provided accommodations: o Are appropriate and effective for meeting the individual student's need(s) to participate in the assessments. o Do not alter the construct being assessed. o 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.
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	Administrator Manual 5.3-7 ACCESS FOR ELLs 2.0® Unique Accommodations Request Form r5.3-1	It is unclear if WIDA requires all states to implement accommodations as outlined in the provided evidence or if states are permitted to alter these. ACCESS
 accommodations; Has a process to individually review and allow exceptional requests for a small number of students who require accommodations beyond those routinely allowed. Ensures that accommodations for all required assessments do not deny students with disabilities or ELs the opportunity to participate in the assessment and any benefits from participation in the assessment. 	ACCESS for ELLs 2.0 Online Sample Items for the Public r5.3-2 CCSSO Accessibility Manual: How to Select, Administer, and Evaluate Use of Accessibility Supports for Instruction and Assessment of All Students r5.3-3 WIDA Research Agenda Supporting English Learners with Disabilities	Document 5.3-3 provides evidence of WIDA's research studies at various stages of completion to verify the appropriateness and effectiveness of allowable accommodations to allow student participation in the WIDA assessments. For example, Page 6 provides evidence of an Accessibility and Accommodations use studies scheduled for summer 2021 to investigate 1) the efficacy of ACCESS's current accommodations; 2) common practices across the consortium in selecting accessibility tools and accommodations for students taking ACCESS; and 3) how IEP team members understand and differentiate accessibility tools and accommodations for English language proficiency assessments and content assessments.

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
		Evidence not yet available.
		Document r4.1-2 (p. 35) states that accommodations should not "affect the validity and reliability of the interpretation of the scores for their intended purposes." Similarly, document 2.2-16 (p. 6) states that accessibility supports identified as likely to compromise the validity of the assessment and invalidate students' results are excluded from the Accessibility and Accommodations Supplement. However, neither documents provide evidence of what procedures are used to accomplish this goal.
		WIDA is currently developing evaluation tools for the assessment using the updated CCSSO Accessibility Manual. The work will be completed in 2021. WIDA should submit documentation to peer review when completed.
		WIDA has provided a timeline and comprehensive research agenda for supporting ELs with disabilities. These studies will address important information across a range of topics including DIF, reporting, performance differences for Els with and without accommodations.
		The submitted evidence is hopeful, yet it is insufficient to meet the requirements of this CE at this time.
		Alternate ACCESS Evidence specific to the Alternate ACCESS not found.
		• Evidence of a process to individually review and allow exceptional requests for a small number of students who require accommodations beyond those routinely allowed.
	evidence requested by the neer reviewers does not necessarily	5.3.7 provides a process for other accommodations to be considered for ACCESS (but not specifically Alternate ACCESS.)

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		For Alternate ACCESS:
		• Evidence that appropriate accommodations are available for ELs.
		Evidence specific to Alternate ACCESS was not found.
		• Evidence that accommodations do not deny students with disabilities or ELs the opportunity to participate in the assessment
		Evidence specific to Alternate ACCESS was not found.

Section 5.3 Summary Statement

3. T	1 11 1	• 1	•		
Nο	additional	evidence	15	reguired	or
110	additional	e , raciice	10	10901100	01

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

For ACCESS and Alternate ACCESS:

- Evidence that the provided accommodations:
- o Are appropriate and effective for meeting the individual student's need(s) to participate in the assessments.
- o Do not alter the construct being assessed.
- o 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.

For Alternate ACCESS:

- Evidence that appropriate accommodations are available for ELs.
- Evidence that accommodations do not deny students with disabilities or ELs the opportunity to participate in the assessment
- Evidence of a process to individually review and allow exceptional requests for a small number of students who require accommodations beyond those routinely allowed.

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
The State monitors test administration in	reference	The CE requires state specific evidence to meet.
ts districts and schools to ensure that		
appropriate assessments, with or without		
accommodations, are selected for all		
students with disabilities and ELs so that		
they are appropriately included in		
assessments and receive accommodations		
that are:		
 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 ELP assessments, and		
AELPA.		
Section 5.4 Summary Statement		
<u>.</u>		
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 needed/provide brief rationale: • [list additional evidence needed w/brief rationale]		

SECTION 6: ELP ACHIEVEMENT STANDARDS AND REPORTING

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

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
 For ELP standards: The State adopted ELP achievement standards that address the different proficiency levels of ELs; If the State has developed alternate ELP achievement standards, it has adopted them only for ELs who are students with the most significant cognitive disabilities who cannot participate in the regular ELP assessment even with appropriate accommodations. 		The CE requires state specific evidence to meet.
Section 6.1 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 6.2 – ELP Achievement Standards Setting

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
Critical Element	reference)	
Critical Element The State used a technically sound method and process that involved panelists with appropriate experience and expertise for setting: • ELP achievement standards and, as applicable, alternate ELP achievement standards, such that: • Cut scores are developed for every grade/grade band, content domain/language domain, and/or composite for which proficiency-level scores are reported.	Evidence (Record document and page # for future	The blue text is the additional evidence requested by previous peer reviewers. For Alternate ACCESS: • Evidence that the State used a technically sound method and process for setting ELP achievement standards, such that cut scores are developed for every grade/grade band, content domain/language domain, and/or composite for which proficiency-level scores are reported. Document 6.1-3 (pp. 12-15) provides evidence of a procedure based on a series of logistic regression analyses to derive cut scores for the Alternate ACCESS proficiency levels. In addition to the cut scores for each domain, cut scores were also determined for four composite scores: Oral Language, Comprehension, Literacy, and Overall. The derivation of cut scores was based on the rationale that the English language proficiency development of students with
		Oral Language, Comprehension, Literacy, and Overall. The derivation of cut scores was based on the rationale that the English language proficiency development of students with the most significant cognitive disabilities does not increase dramatically from one grade level to the next, and that the same cut scores are used for all grade clusters (from grades 1 to 12) by domain to help detect growth in English language proficiency from year to year. Table 6-A presents the cuts for four domain scores and four composite scores
		 (p. 15). Sufficient data were not presented. For example, it a logistic regression was done, the logistic regression should be shown in the report. CE 6.2 requires that "cut scores are developed for every grade/grade band, content domain/language domain, and/or composite for which proficiency-level scores are reported." Document r6.2-1 provides evidence of a WIDA's study to support states' reclassification criteria for students who participate in Alternate ACCESS. To this end, the study

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		examined the relationship between Alternate ACCESS and Dynamic Learning Maps (DLM), a content assessment for students with the most significant cognitive disabilities used in several WIDA states. Findings from the study showed that the Alternate ACCESS overall composite proficiency level of P2 (Emerging) best indicates that a student will receive an At Target or Advanced performance level on DLM ELA, mathematics and science assessments (p. 16). The study presented is interesting, however it appears DLM assigns performance levels against grade level standards, not a single standard across multiple grade levels. This is a reclassification study, not a standard setting study.
Section 6.2 Summary Statement		
No additional evidence is required orX_ The following additional evidence is needed/provide brief rationale:		
For Alternate ACCESS:		
• Evidence that the State used a technically sound method and process for setting ELP achievement standards, such that cut scores are developed for every grade/grade band, content domain/language domain, and/or composite for which proficiency-level scores are reported.		

Critical Element 6.3 – Aligned ELP Achievement Standards

Critical Element	Evidence (Record document and page # for future	Comments/Notes/Questions/Suggestions Regarding
	reference)	State Documentation or Evidence
For ELP achievement standards:	r3.1-1	The blue text is the additional evidence requested by
The State has ensured that ELP	Conducting a series of alignment studies	previous peer reviewers.
assessment results are expressed in terms		
that are clearly aligned with the State's		For ACCESS:
ELP standards, and its ELP performance-		
level descriptors.		• Evidence that ELP assessment results are expressed in
		terms that are clearly aligned with the State's ELP
If the State has adopted alternate ELP		standards and its ELP performance level descriptors.
achievement standards for ELs who are		
students with the most significant		Studies described have not yet been completed. Document
cognitive disabilities, the alternate ELP		r3.1-1 provides evidence of proposed WIDA's studies to
achievement standards should be linked to		ensure that ELP assessment results are expressed in terms
the State's grade-level/grade-band ELP		that are clearly aligned with the State's ELP standards and
standards, and should reflect professional		its ELP performance-level descriptors. The proposed work
judgment of the highest ELP achievement		includes a) an alignment study in Summer 2021 of the
standards possible for ELs who are		online and paper versions of ACCESS to the WIDA 2007
students with the most significant		and 2012 ELP Standards, and b) a Spring 2021
cognitive disabilities.		correspondence study between WIDA's ELP Standards and
		state career and college ready science standards.
		The evidence provided by the state does not address the
		requested evidence from the initial peer review. In short,
		alignment studies will not demonstrate that the process for
		developing performance level descriptors was done in a
		technically appropriate manner as in the industry standard
		methods and the requirements of this CE.
		E. Alkamata ACCECC
		For Alternate ACCESS:
		If the State has developed alternate ELP achievement
		standards, evidence that the alternate ELP achievement
		standards, evidence that the anti-nate EEF achievement standards are linked to the State's grade-level/grade-
		band ELP standards and reflect professional judgment
		of the highest ELP achievement standards possible for
		of the highest ELF achievement standards possible for

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		ELs who are students with the most significant cognitive disabilities.
		Document r3.1-2 provides evidence of the relationship between the Alternate ACCESS and WIDA's ELP standards (see Critical Element 3.1 above) based on a 2020 two-part study designed to 1) explore the alignment between Alternate ACCESS and the Alternate Model Performance Indicators (AMPIs), assessable downward extensions of the Model Performance Indicators (MPIs) from ELP standards; and 2) examine the linkage between the AMPIs and MPIs.
		The WIDA response to this request referred to CE 3.1 which WIDA did not provide sufficient evidence to meet. This lack of sufficient evidence also applies to this CE.

Section 6.3 Summary Statement

No additional evidence is required or

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

For ACCESS:

• Evidence that ELP assessment results are expressed in terms that are clearly aligned with the State's ELP standards and its ELP performance level descriptors.

For Alternate ACCESS:

• If the State has developed alternate ELP achievement standards, evidence that the alternate ELP achievement standards are linked to the State's grade-level/grade-band ELP standards and reflect professional judgment of the highest ELP achievement standards possible for ELs who are students with the most significant cognitive disabilities.

Critical Element 6.4 - Reporting

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
The State reports its assessment results for all students assessed, and the reporting	6.4-3 ALTERNATE ACCESS for ELLs SPRING 2018	The blue text is the additional evidence requested by previous peer reviewers.
facilitates timely, appropriate, credible, and defensible interpretations and uses of	Interpretive Guide for Score Reports Grades 1-12 r6.4-1	For ACCESS and Alternate ACCESS:
those results by parents, educators, State officials, policymakers and other	ADI-PPT-Notes-10.25.19,	• Evidence that the State's reporting of assessment results
stakeholders, and the public.	See pp.15, 16, 24-26.	facilitates timely interpretations and uses of those results by parents, educators, State officials, policymakers and other
	r6.4-2	stakeholders, and the public.
The State reports to the public its assessment results on <i>English language</i>	LEA-Notes-12.11.19,	• Evidence that the State provides coherent and timely
proficiency for all ELs including the	See pp. 4, 5.	information about each student's attainment of the State's ELP standards to parents that are, to the extent practicable,
number and percentage of ELs attaining	r6.4-3	written in a language that parents and guardians can
ELP.	ADI-Notes-12.19.19,	understand or, if it is not practicable to provide written
For the <i>ELP assessment</i> , the State	See p.1.	translations to a parent or guardian with limited English proficiency, are orally translated for such parent or
provides coherent and timely information		guardian.
about each student's attainment of the State's ELP standards to parents that:		• Evidence that student reports are, upon request by an
• Reports the <i>ELs' English proficiency</i>		individual with a disability, provided in an alternative format accessible to that parent.
in terms of the State's grade		•
level/grade-band ELP standards (including performance-level		The provided response contains no evidence that WIDA
descriptors);		facilitates timely interpretations and use of results nor provides coherent and timely information about each
• Are provided in an understandable		student's attainment of the ELP standards which were two
and uniform format;Are, to the extent practicable, written		of the three critical evidences requested for this CE.
in a language that parents and		There is no evidence submitted regarding the availability of
guardians can understand or, if it is		a student's assessment information in an alternative format
not practicable to provide written translations to a parent or guardian		upon request by a parent who is an individual with a disability.
with limited English proficiency, are		
orally translated for such parent or guardian;		These aspects of this critical element will need to be
 Upon request by a parent who is an 		addressed by states if the consortium does not provide evidence of meeting this CE.

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
individual with a disability as defined by the ADA, as amended, are provided in an alternative format		For Alternate ACCESS:
accessible to that parent.		• Evidence that performance level descriptors are included on student score reports.
		Document 2.1-3 (p. 21) provides evidence that Alternate ACCESS English language proficiency (performance) levels for the productive and receptive language domains are included on the Alternate ACCESS Individual Student Report.
		The Alternate ACCESS ISR included additional subscales that are not the four domains. These subscales do not appear to have bene included in the initial peer review and the peers are concerned that there is not sufficient evidence of reliability and validity nor are there standards set for these subscales.

Section 6.4 Summary Statement

____ No additional evidence is required or

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

For ACCESS and Alternate ACCESS:

- Evidence that the State's reporting of assessment results facilitates timely interpretations and uses of those results by parents, educators, State officials, policymakers and other stakeholders, and the public.
- Evidence that the State provides coherent and timely information about each student's attainment of the State's ELP standards to parents that are, to the extent practicable, written in a language that parents and guardians can understand or, if it is not practicable to provide written translations to a parent or guardian with limited English proficiency, are orally translated for such parent or guardian.
- Evidence that student reports are, upon request by an individual with a disability, provided in an alternative format accessible to that parent.

For Alternate ACCESS

• Due to the new evidence submitted for this review, it appears the original review lacked information on the three subscales that appear on the Alternate ACCESS ISR. An explanation of the three subscales including validity, standards, reliability, standard setting etc. needs to be provided.

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

SECTION 7: DOES NOT APPLY TO ELP ASSESSMENT PEER REVIEW