



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Michael Sentence
State Superintendent
Alabama State Department of Education
50 North Ripley Street
P.O. Box 302101
Montgomery, AL 36104

January 6, 2017

Dear Superintendent Sentence:

Thank you for your participation in the U.S. Department of Education's (Department) assessment peer review process under Title I of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the No Child Left Behind Act of 2001 (NCLB). The Every Student Succeeds Act (ESSA) maintains the essential requirements from NCLB that each State annually administer high-quality assessments in at least reading/language arts, mathematics, and science that meet nationally recognized professional and technical standards. Therefore, as you know, the Department reinstated peer review of State assessment systems so that each State receives feedback from external experts on the assessments it is currently administering. We appreciate the efforts required to prepare for the peer review, which occurred in June 2016. 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 child'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.

On October 6, 2016, the Department sent a letter to chief State school officers outlining the outcomes for States related to the assessment peer review. I am writing to provide you feedback on Alabama State Department of Education's (ALSDE) recent submission of evidence. External peer reviewers and Department staff evaluated Alabama's submission and 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 section 1111(b)(1) and (3) of the ESEA, as amended by NCLB. Based on the recommendations from this peer review and our own analysis of the State's submission, I have determined the following:

- Reading/language arts (R/LA) and mathematics general assessments in grades 3-8 (ACT Aspire): **Partially meets requirements**
- Science assessments in grade bands 3-5 and 6-8 (ACT Aspire): **Partially meets requirements**

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

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

The specific list of items required for ALSDE to submit is enclosed with this letter. Because several of the State's components have partially met the requirements, the Department is placing a condition on the State's Title I grant award related to those components of the assessment system. To satisfy this condition, ALSDE must submit satisfactory evidence to address the items identified in the enclosed list. ALSDE must submit a plan and timeline within 30 days for when it will submit all required additional documentation for peer review. The Department will also host regular (e.g., quarterly) progress calls with the State to discuss the State's progress on its timeline. If, following the peer review of the additional evidence, adequate progress is not made, the Department may take additional action. Additionally, the Office of Special Education and Rehabilitative Services (OSERS) will monitor progress on matters pertaining to requirements in the Individuals with Disabilities Education Act (IDEA) related to the participation of students with disabilities in Title I assessments. Insufficient progress to address such matters may lead OSERS to place a condition on ALSDE's federal fiscal year 2017 IDEA Part B grant award.

The Department notes that ALSDE submitted a waiver request for assessing speaking and listening that was approved on June 24, 2016, for the 2016-2017, 2017-2018 and 2018-2019 school years.

In addition, 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 Ashlee Schmidt or LaTisha Putney of my staff at: OSS.Alabama@ed.gov.

Sincerely,

/s/

Ann Whalen
Senior Advisor to the Secretary
Delegated the Duties of Assistant Secretary
for Elementary and Secondary Education

Enclosures

cc: Rebecca Mims, Coordinator of Student Assessment

Critical Elements Where Additional Evidence is Needed to Meet the Requirements for Alabama’s Assessment System

Critical Element	Additional Evidence Needed
1.5 – Participation Rate Data	For the reading/language arts (R/LA), mathematics and science general and alternate assessments aligned with alternate academic achievement standards (AA-AAAS), Alabama State Department of Education (ALSDE) must provide: <ul style="list-style-type: none"> • Evidence of student counts (corresponding to participation rates) to show that each student is tested. • Evidence of overall participation rates (aggregating participation on the general and alternate assessments) at each grade level and for all subjects, by subgroup.
2.1 – Test Design and Development	For the R/LA, mathematics, and science general assessments in grades 3-8 (ACT Aspire), ALSDE must provide: <ul style="list-style-type: none"> • Test blueprints that describe the structure of each assessment in sufficient detail to support the development of assessments that are technically sound, measure the full range of the ALSDE grade-level academic content standards (Courses of Study). <ul style="list-style-type: none"> ○ For R/LA, evidence that the assessment design measures the full breadth and depth of the ALSDE Courses of Study, including speaking and listening. [NOTE: ALSDE has received a speaking and listening waiver; therefore, the Department does not expect ALSDE to submit additional evidence regarding speaking and listening during the period of the waiver] • Evidence of processes to ensure that each assessment is tailored to the knowledge and skills included in the ALSDE Courses of Study, reflects appropriate inclusion of challenging content, and requires complex demonstrations or applications of knowledge and skills (<i>i.e.</i>, higher-order thinking skills).
2.2 – Item Development	For the R/LA, mathematics, and science general assessments in grades 3-8 (ACT Aspire), ALSDE must provide: <ul style="list-style-type: none"> • Evidence of explicit consideration of ALSDE’s Course of Study in the development of the ACT Aspire, OR • Evidence that ACT Aspire tests are fully aligned with ALSDE Courses of Study in R/LA, mathematics, and science.
2.4 – Monitoring Test Administration	For the entire assessment system in the State, ALSDE must provide: <ul style="list-style-type: none"> • Evidence that specifies which assessments are to be monitored. • Evidence that clarifies which test monitoring procedures were utilized in 2014–2015. • Evidence of the State’s monitoring process, including: <ul style="list-style-type: none"> ○ Selecting which districts and schools will be monitored by the State educational agency staff. ○ The cycle for monitoring schools and districts across the State; ○ Schedules for monitoring; ○ Monitors’ roles and responsibilities of key personnel; and ○ Summary of the results of the State’s monitoring for the 2014–2015 test administration.
2.6 – Systems for	For the entire assessment system in the State, ALSDE must provide:

Critical Element	Additional Evidence Needed
Protecting Data Integrity and Privacy	<ul style="list-style-type: none"> Evidence of a policy for the minimum number of students necessary to allow group reporting of scores (minimum n size).
3.1 – Overall Validity, including Validity Based on Content	<p>For the R/LA, mathematics, and science general assessments in grades 3-8 (ACT Aspire), ALSDE must provide:</p> <ul style="list-style-type: none"> Documentation of an independent alignment study between each of the State’s assessments and the State Courses of Study that the assessments are designed to measure in terms of: <ul style="list-style-type: none"> Content (<i>i.e.</i>, knowledge and process); The full range of the State Courses of Study; Balance of content; and Cognitive complexity
3.2 – Validity Based on Cognitive Processes	<p>For the R/LA, mathematics, and science general assessments in grades 3-8 (ACT Aspire), ALSDE must provide:</p> <ul style="list-style-type: none"> Documentation of alignment between each of the State’s assessments and the State Courses of Study that the assessments are designed to measure in terms of the intended cognitive processes appropriate for each grade level.
3.3 – Validity Based on Internal Structure	<p>For the mathematics general assessments in grades 4 and 6 (ACT Aspire), ALSDE must provide:</p> <ul style="list-style-type: none"> Additional evidence that supports the validity of the internal structure of the tests, including a plan for monitoring and improving the validity based on internal structure (specifically the dimensionality) of the tests.
4.1 – Reliability	<p>For the R/LA, mathematics, and science general assessments in grades 3-8 (ACT Aspire), ALSDE must provide:</p> <ul style="list-style-type: none"> Evidence of reliability estimates and conditional standard errors of measurement for the State’s student population overall and for each student sub-group in the State. Evidence it has addressed the reliability issues identified for the mathematics tests in grades 4 and 5.
4.3 – Full Performance Continuum	<p>For the R/LA, mathematics, and science general assessments in grades 3-8 (ACT Aspire), ALSDE must provide:</p> <ul style="list-style-type: none"> Evidence for conditional standard errors of measure as noted in element 4.1 above.
4.4 – Scoring	<p>For the R/LA, mathematics, and science general assessments in grades 3-8 (ACT Aspire), ALSDE must provide:</p> <ul style="list-style-type: none"> Evidence of the observed inter-rater reliability for 2015 constructed-response scoring in R/LA, mathematics, and science. Evidence that includes a description of the procedures for scoring the writing assessment, including the observed inter-rater reliability for 2015, if these are different than scoring procedures for constructed-response items on the other subject matter tests; and Evidence of the criteria for scoring items that have different numbers of score points.
4.7 – Technical Analysis and Ongoing	<p>For the R/LA, mathematics, and science general assessments in grades 3-8 (ACT Aspire), ALSDE must provide:</p> <ul style="list-style-type: none"> Evidence which describes the processes and procedures to maintain and

Critical Element	Additional Evidence Needed
Maintenance	<p>monitor the assessment system (<i>e.g.</i>, a complete technical manual for a test administration).</p> <ul style="list-style-type: none"> • Evidence of Technical Advisory Committee (TAC) activity which provide examples of recommendations or advice on issues regarding the technical analysis and ongoing maintenance of AL’s assessment system (<i>e.g.</i>, TAC meeting agendas, TAC meeting minutes).
5.3 – Test Accommodations	<p>For the R/LA, mathematics and science general assessments in grades 3-8 (ACT Aspire), ALSDE must provide evidence that the accommodations provided:</p> <ul style="list-style-type: none"> • Are appropriate and effective for meeting the individual student’s need(s) to participate in the assessments. • Do not alter the construct being assessed. • 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 Test Administration for Special Populations	<p>For the entire assessment system in the State, ALSDE must provide:</p> <ul style="list-style-type: none"> • Evidence that test monitoring procedures and training address test accommodations and fidelity to test administration procedures.
6.1 – State Adoption of Academic Achievement Standards for All Students	<p>For the entire assessment system in the State, ALSDE must provide:</p> <ul style="list-style-type: none"> • Evidence that the State formally adopted academic achievement standards in the tested grades. • Evidence that The State applies its grade-level academic achievement standards to all public elementary and secondary school students enrolled in the grade to which they apply.
6.3 – Challenging and Aligned Academic Achievement Standards	<p>For the R/LA, mathematics, and science general assessments in grades 3-8 (ACT Aspire), ALSDE must provide:</p> <ul style="list-style-type: none"> • Evidence that State’s academic achievement standards are challenging and aligned with the State Courses of Study.
6.4 – Reporting	<p>For the R/LA, mathematics, and science general assessments in grades 3-8 (ACT Aspire), ALSDE must provide:</p> <ul style="list-style-type: none"> • Examples of State-level reports that include the percentage of students not tested as required for this element. • Examples of actual student reports and interpretive guide documents provided to principals, teachers, parents, and districts. • Evidence that reports are available in alternate formats (<i>e.g.</i>, Braille or large print) upon request and, to the extent practicable, in a native language that parents can understand. • Evidence that individual student reports include performance-level descriptors. • Documentation of the process and timeline for delivering individual student reports to parents, teachers, and principals as soon as practicable after each test administration. • Evidence that if students in the State are tested with off-grade level content that scores reported are based only on grade level content items.

