



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Frank Edelblut
Commissioner of Education
New Hampshire Department of Education
101 Pleasant Street
Concord, NH 03301-3860

June 5, 2018

Dear Commissioner Edelblut:

Thank you for submitting New Hampshire's application for the Innovative Assessment Demonstration Authority (IADA) authorized in section 1204 of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA). I appreciate the work of you and your team – as well as the educators across New Hampshire who have been working on PACE for the last several years – to develop this IADA proposal.

I am writing to provide initial feedback based on the U.S. Department of Education's (the Department's) review of NHDOE's IADA application. As you know, in addition to the Department's review of the application, we conducted, as required by the statute, a peer review of the application. Peer reviewers examined the application using the program requirements and selection criteria described in 34 CFR §§ 200.105 and 200.106. The goal of the peer review was to inform the Department regarding whether the proposed system is comparable to the State assessments, valid, reliable, of high technical quality, consistent with relevant, nationally recognized professional and technical standards, and provides unbiased, rational, and consistent determinations of progress toward meeting the ambitious, State-designed long-term goals for academic achievement.

Based on our review of the peer feedback and our own analysis of the application, I am requesting additional information to ensure the State's application meets all statutory and regulatory requirements, as detailed in the enclosed table. In addition, information is requested to strengthen your State's application regarding several of the selection criteria. I am also enclosing a copy of the peer technical review forms. Please note that the Department's feedback may differ from that contained in the peer review form. I encourage you to read the full peer review forms for additional suggestions and recommendations regarding NHDOE's application. Department staff will contact you to support New Hampshire in addressing the items enclosed with this letter.

ESEA section 1204(f)(4) requires the Department to issue a written determination within 90 days of a State's submission of its IADA application, which is July 1, 2018, for the NHDOE application. Given this statutory requirement, I ask that you provide the requested additional information and submit it through OMB Max by June 19, 2018. If you would like more time to submit additional information, please contact your Office of State Support Program Officer in

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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.

writing and indicate your new submission date. Please recognize that if the Department accommodates your request for additional time, a determination on the NHDOE IADA application may be rendered after the 90-day period.

Thank you for the important work that you and your staff are doing to support the innovation that is possible through the ESSA. The Department looks forward to working with you to ensure that all children have the opportunity to reach their full potential.

Sincerely,

/s/

Jason Botel
Principal Deputy Assistant Secretary,
Delegated the Authority to Perform the
Functions and Duties of the Assistant
Secretary of Elementary and Secondary
Education

Enclosures

cc: Heather Gage

Items that Require Additional Information or Revision in New Hampshire’s Innovative Assessment Demonstration Authority Plan

Regulatory requirement	Required information from the SEA
<p><u>Consultation.</u> Evidence that the SEA or consortium has developed an innovative assessment system in collaboration with--</p> <p>(1) Experts in the planning, development, implementation, and evaluation of innovative assessment systems, which may include external partners; and</p> <p>(2) Affected stakeholders in the State, or in each State in the consortium, including--</p> <p>(i) Those representing the interests of children with disabilities, English learners, and other subgroups of students described in section 1111(c)(2) of the Act;</p> <p>(ii) Teachers, principals, and other school leaders;</p> <p>(iii) Local educational agencies (LEAs);</p> <p>(iv) Representatives of Indian tribes located in the State;</p> <p>(v) Students and parents, including parents of children described in paragraph (a)(2)(i) of this section; and</p> <p>(vi) Civil rights organizations.</p>	<p>Provide a description for how the State has monitored the LEA consultation with those representing the interests of children (including children with disabilities, English learners, and other sub-groups of students described in section 1111(c)(2) of the ESEA).</p>
<p><u>Innovative assessment system.</u> A demonstration that the innovative assessment system does or will--</p> <p>(1) Meet the requirements of section 1111(b)(2)(B) of the Act, except that an innovative assessment--</p> <p>(i) Need not be the same assessment administered to all public elementary and secondary school students in the State during the demonstration authority period described in 34 CFR 200.104(b)(2) or extension period described in 34 CFR 200.108 and prior to statewide use consistent with 34 CFR 200.107, if the innovative assessment system will be administered initially to all students in participating schools within a participating LEA, provided that the statewide academic assessments under 34 CFR 200.2(a)(1) and section 1111(b)(2) of the Act are administered to all students in any non-participating LEA or any non-participating school within a participating LEA; and</p> <p>(ii) Need not be administered annually in each of grades 3-8 and at least once</p>	<p>From the most recently available year of data, evidence that all students in participating PACE schools participated in either the PACE pilot assessment or the statewide assessment as required in section 1201(e)(2)(A)(x and xi) of the ESEA (i.e., a report that shows for each participating school, by grade, the participation rates in PACE and the participation rates in the statewide assessment for those grade/subjects not assessed with PACE).</p>

Regulatory requirement	Required information from the SEA
<p>in grades 9-12 in the case of reading/language arts and mathematics assessments, and at least once in grades 3-5, 6-9, and 10-12 in the case of science assessments, so long as the statewide academic assessments under 34 CFR 200.2(a)(1) and section 1111(b)(2) of the Act are administered in any required grade and subject under 34 CFR 200.5(a)(1) in which the SEA does not choose to implement an innovative assessment.</p>	
<p>2)(i) Align with the challenging State academic content standards under section 1111(b)(1) of the Act, including the depth and breadth of such standards, for the grade in which a student is enrolled; and (ii) May measure a student’s academic proficiency and growth using items above or below the student’s grade level so long as, for purposes of meeting the requirements for reporting and school accountability under sections 1111(c) and 1111(h) of the Act and paragraphs (b)(3) and (b)(7)-(9) of this section, the State measures each student’s academic proficiency based on the challenging State academic standards for the grade in which the student is enrolled;</p>	<p>No evidence required.</p>
<p>(3) Express student results or competencies consistent with the challenging State academic achievement standards under section 1111(b)(1) of the Act and identify which students are not making sufficient progress toward, and attaining, grade-level proficiency on such standards;</p>	<p>No evidence required.</p>
<p>(4)(i) Generate results, including annual summative determinations as defined in paragraph (b)(7) of this section, that are valid, reliable, and comparable for all students and for each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act, to the results generated by the State academic assessments described in 34 CFR 200.2(a)(1) and section 1111(b)(2) of the Act for such students. Consistent with the SEA’s or consortium’s evaluation plan under 34 CFR 200.106(e), the SEA must plan to annually determine comparability during each year of its demonstration authority period in one of the following ways: (A) Administering full assessments from both the innovative and statewide assessment systems to all students enrolled in participating schools, such that at least once in any grade span (i.e., 3-5, 6-8, or 9-12) and subject for which there is an innovative assessment, a statewide assessment in the same subject would</p>	<p>While the approach described seems responsive to the question and likely to result in the State evaluating whether the assessments provide comparable results, NH DOE must provide the results of the studies identified in its application (on pages 20-27), namely:</p> <ol style="list-style-type: none"> 1. Results of the Inter-Rater Reliability Analyses in 2015, 2016, and 2017. 2. Results of the Generalizability Analyses in 2016 and 2017. 3. Results of the contrasting group standard setting analyses from 2015, 2016, and 2017. 4. Results of the calibration audits during the

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<p>also be administered to all such students. As part of this determination, the innovative assessment and statewide assessment need not be administered to an individual student in the same school year.</p> <p>(B) Administering full assessments from both the innovative and statewide assessment systems to a demographically representative sample of all students and subgroups of students described in section 1111(c)(2) of the Act, from among those students enrolled in participating schools, such that at least once in any grade span (i.e., 3-5, 6-8, or 9-12) and subject for which there is an innovative assessment, a statewide assessment in the same subject would also be administered in the same school year to all students included in the sample.</p> <p>(C) Including, as a significant portion of the innovative assessment system in each required grade and subject in which both an innovative and statewide assessment are administered, items or performance tasks from the statewide assessment system that, at a minimum, have been previously pilot tested or field tested for use in the statewide assessment system.</p> <p>(D) Including, as a significant portion of the statewide assessment system in each required grade and subject in which both an innovative and statewide assessment are administered, items or performance tasks from the innovative assessment system that, at a minimum, have been previously pilot tested or field tested for use in the innovative assessment system.</p> <p>(E) An alternative method for demonstrating comparability that an SEA can demonstrate will provide for an equally rigorous and statistically valid comparison between student performance on the innovative assessment and the statewide assessment, including for each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act;</p>	<p>PACE Summer Institute in 2015, 2016, and 2017.</p> <ol style="list-style-type: none"> 5. Results of the body of evidence audits from 2015, 2016, and 2017. 6. Results of the analysis of the rigor of the performance standards across PACE and non-PACE assessment systems from 2015, 2016, and 2017. 7. Results of the concurrent comparability evaluations from 2016 and 2017. 8. Results of the non-concurrent comparability evaluations from 2016 and 2017.
<p>(ii) Generate results, including annual summative determinations as defined in paragraph (b)(7) of this section, that are valid, reliable, and comparable, for all students and for each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act, among participating schools and LEAs in the innovative assessment demonstration authority. Consistent with the SEA’s or consortium’s evaluation</p>	<p>See information required under 4(i) above.</p>

Regulatory requirement	Required information from the SEA
<p>plan under 34 CFR 200.106(e), the SEA must plan to annually determine comparability during each year of its demonstration authority period;</p>	
<p>(5)(i) Provide for the participation of all students, including children with disabilities and English learners; (ii) Be accessible to all students by incorporating the principles of universal design for learning, to the extent practicable, consistent with 34 CFR 200.2(b)(2)(ii); and (iii) Provide appropriate accommodations consistent with 34 CFR 200.6(b) and (f)(1)(i) and section 1111(b)(2)(B)(vii) of the Act;</p>	<p>See information requested in requirement (1) above.</p>
<p>(6) For purposes of the State accountability system consistent with section 1111(c)(4)(E) of the Act, annually measure in each participating school progress on the Academic Achievement indicator under section 1111(c)(4)(B) of the Act of at least 95 percent of all students, and 95 percent of students in each subgroup of students described in section 1111(c)(2) of the Act, who are required to take such assessments consistent with paragraph (b)(1)(ii) of this section;</p>	<p>No evidence required.</p>
<p>(7) Generate an annual summative determination of achievement, using the annual data from the innovative assessment, for each student in a participating school in the demonstration authority that describes-- (i) The student’s mastery of the challenging State academic standards under section 1111(b)(1) of the Act for the grade in which the student is enrolled; or (ii) In the case of a student with the most significant cognitive disabilities assessed with an alternate assessment aligned with alternate academic achievement standards under section 1111(b)(1)(E) of the Act, the student’s mastery of those standards;</p>	<p>No evidence required.</p>
<p>(8) Provide disaggregated results by each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act, including timely data for teachers, principals and other school leaders, students, and parents consistent with 34 CFR 200.8 and section 1111(b)(2)(B)(x) and (xii) and section 1111(h) of the Act, and provide results to parents in a manner consistent with paragraph (b)(4)(i) of this section and part 200.2(e);</p>	<p>A report which demonstrates specifically the disaggregated results of all students in participating PACE schools in the PACE assessment is required.</p>

Regulatory requirement	Required information from the SEA
<p>(9) Provide an unbiased, rational, and consistent determination of progress toward the State’s long-term goals for academic achievement under section 1111(c)(4)(A) of the Act for all students and each subgroup of students described in section 1111(c)(2) of the Act and a comparable measure of student performance on the Academic Achievement indicator under section 1111(c)(4)(B) of the Act for participating schools relative to non-participating schools so that the SEA may validly and reliably aggregate data from the system for purposes of meeting requirements for--</p> <p>(i) Accountability under sections 1003 and 1111(c) and (d) of the Act, including how the SEA will identify participating and non-participating schools in a consistent manner for comprehensive and targeted support and improvement under section 1111(c)(4)(D) of the Act; and</p> <p>(ii) Reporting on State and LEA report cards under section 1111(h) of the Act.</p>	<p>See information requested under (8) above.</p>
<p><u>Initial implementation in a subset of LEAs or schools. If the innovative assessment system will initially be administered in a subset of LEAs or schools in a State--</u></p> <p>(1) A description of each LEA, and each of its participating schools, that will initially participate, including demographic information and its most recent LEA report card under section 1111(h)(2) of the Act; and</p> <p>(2) An assurance from each participating LEA, for each year that the LEA is participating, that the LEA will comply with all requirements of this section.</p>	<p>NH DOE must provide an assurance from each LEA that that the LEA will comply with all requirements of the IADA, as applicable.</p>
<p><u>Application from a consortium of SEAs.</u> If an application for the innovative assessment demonstration authority is submitted by a consortium of SEAs--</p> <p>(1) A description of the governance structure of the consortium, including--</p> <p>(i) The roles and responsibilities of each member SEA, which may include a description of affiliate members, if applicable, and must include a description of financial responsibilities of member SEAs;</p> <p>(ii) How the member SEAs will manage and, at their discretion, share intellectual property developed by the consortium as a group; and</p> <p>(iii) How the member SEAs will consider requests from SEAs to join or leave the consortium and ensure that changes in membership do not affect the consortium’s ability to implement the innovative assessment demonstration</p>	<p>Not applicable.</p>

Regulatory requirement	Required information from the SEA
<p>authority consistent with the requirements and selection criteria in this section and 34 CFR 200.106.</p> <p>(2) While the terms of the association with affiliate members are defined by each consortium, consistent with 34 CFR 200.104(b)(1) and paragraph (f)(1)(i) of this section, for an affiliate member to become a full member of the consortium and to use the consortium’s innovative assessment system under the demonstration authority, the consortium must submit a revised application to the Secretary for approval, consistent with the requirements of this section and 34 CFR 200.106 and subject to the limitation under 34 CFR 200.104(d).</p>	
Assurances	No evidence required.

Application selection criteria	Required information from the SEA
<p>(a)(1) The rationale for developing or selecting the particular innovative assessment system to be implemented under the demonstration authority, including--</p> <p>(i) The distinct purpose of each assessment that is part of the innovative assessment system and how the system will advance the design and delivery of large-scale, statewide academic assessments in innovative ways; and</p> <p>(ii) The extent to which the innovative assessment system as a whole will promote high-quality instruction, mastery of challenging State academic standards, and improved student outcomes, including for each subgroup of students described in section 1111(c)(2) of the Act;</p>	<p>NH DOE must provide:</p> <ol style="list-style-type: none"> 1. A specific description of how each component of PACE (local summative tests, common performance tasks and local performance assessments) contributes to the annual summative determination for each grade/subject in the pilot. 2. A clear description of how the PACE assessment design affords students multiple ways to demonstrate that they have mastered the content.
<p>(a)(2) The plan the SEA or consortium, in consultation with any external partners, if applicable, has to--</p> <p>(i) Develop and use standardized and calibrated tools, rubrics, methods, or other strategies for scoring innovative assessments throughout the demonstration authority period, consistent with relevant nationally recognized professional and technical standards, to ensure inter-rater reliability and comparability of innovative assessment results consistent with 34 CFR part 200.105(b)(4)(ii), which may include evidence of inter-rater reliability; and</p>	<p>A plan to continue, for all participating PACE LEAs, during the period of the demonstration authority:</p> <ol style="list-style-type: none"> 1. Performance standards validations. 2. Local scoring audit activities (known as body of work samples).

Application selection criteria	Required information from the SEA
(ii) Train evaluators to use such strategies, if applicable;	
<p>(a)(3) If the system will initially be administered in a subset of schools or LEAs in a State--</p> <p>(i) The strategies the SEA, including each SEA in a consortium, will use to scale the innovative assessment to all schools statewide, with a rationale for selecting those strategies;</p> <p>(ii) The strength of the SEA’s or consortium’s criteria that will be used to determine LEAs and schools that will initially participate and when to approve additional LEAs and schools, if applicable, to participate during the requested demonstration authority period; and</p> <p>(iii) The SEA’s plan, including each SEA in a consortium, for how it will ensure that, during the demonstration authority period, the inclusion of additional LEAs and schools continues to reflect high-quality and consistent implementation across demographically diverse LEAs and schools, or contributes to progress toward achieving such implementation across demographically diverse LEAs and schools, including diversity based on enrollment of subgroups of students described in section 1111(c)(2) of the Act and student achievement. The plan must also include annual benchmarks toward achieving high-quality and consistent implementation across participating schools that are, as a group, demographically similar to the State as a whole during the demonstration authority period, using the demographics of initially participating schools as a baseline.</p>	<p>A projected schedule for the inclusion of additional LEAs into the PACE pilot assessment that includes specific targets/goals for expansion during each year of the demonstration period.</p>
<p>(b)(1) The extent and depth of prior experience that the SEA, including each SEA in a consortium, and its LEAs have in developing and implementing the components of the innovative assessment system. An SEA may also describe the prior experience of any external partners that will be participating in or supporting its demonstration authority in implementing those components. In evaluating the extent and depth of prior experience, the Secretary considers—</p> <p>(i) The success and track record of efforts to implement innovative assessments or innovative assessment items aligned to the challenging State academic standards under section 1111(b)(1) of the Act in LEAs planning to participate; and</p>	<p>See information requested under (a)(3) above.</p>

Application selection criteria	Required information from the SEA
<p>(ii) The SEA’s or LEA’s development or use of--</p> <p>(A) Effective supports and appropriate accommodations consistent with 34 CFR part 200.6(b) and (f)(1)(i) and section 1111(b)(2)(B)(vii) of the Act for administering innovative assessments to all students, including English learners and children with disabilities, which must include professional development for school staff on providing such accommodations;</p> <p>(B) Effective and high-quality supports for school staff to implement innovative assessments and innovative assessment items, including professional development; and</p> <p>(C) Standardized and calibrated tools, rubrics, methods, or other strategies for scoring innovative assessments, with documented evidence of the validity, reliability, and comparability of annual summative determinations of achievement, consistent with 34 CFR part 200.105(b)(4) and (7).</p>	
<p>(b)(2) The extent and depth of SEA, including each SEA in a consortium, and LEA capacity to implement the innovative assessment system considering the availability of technological infrastructure; State and local laws; dedicated and sufficient staff, expertise, and resources; and other relevant factors. An SEA or consortium may also describe how it plans to enhance its capacity by collaborating with external partners that will be participating in or supporting its demonstration authority. In evaluating the extent and depth of capacity, the Secretary considers--</p> <p>(i) The SEA’s analysis of how capacity influenced the success of prior efforts to develop and implement innovative assessments or innovative assessment items; and</p> <p>(ii) The strategies the SEA is using, or will use, to mitigate risks, including those identified in its analysis, and support successful implementation of the innovative assessment.</p>	<p>Provide specific examples of successful risk mitigation (from previous PACE experience) or provide descriptions of strategies for mitigating the risks associated with implementing the innovative assessment system.</p>
<p>(b)(3) The extent and depth of State and local support for the application for demonstration authority in each SEA, including each SEA in a consortium, as demonstrated by signatures from the following:</p> <p>(i) Superintendents (or equivalent) of LEAs, including participating LEAs in the first year of the demonstration authority period.</p>	<p>None required.</p>

Application selection criteria	Required information from the SEA
<p>(ii) Presidents of local school boards (or equivalent, where applicable), including within participating LEAs in the first year of the demonstration authority.</p> <p>(iii) Local teacher organizations (including labor organizations, where applicable), including within participating LEAs in the first year of the demonstration authority.</p> <p>(iv) Other affected stakeholders, such as parent organizations, civil rights organizations, and business organizations.</p>	
<p>(c)(1) The extent to which the timeline reasonably demonstrates that each SEA will implement the system statewide by the end of the requested demonstration authority period, including a description of--</p> <p>(i) The activities to occur in each year of the requested demonstration authority period;</p> <p>(ii) The parties responsible for each activity; and</p> <p>(iii) If applicable, how a consortium’s member SEAs will implement activities at different paces and how the consortium will implement interdependent activities, so long as each non-affiliate member SEA begins using the innovative assessment in the same school year consistent with 34 CFR part 200.104(b)(2);</p>	<p>NH DOE must provide:</p> <ol style="list-style-type: none"> 1. A timeline for activities during the demonstration authority period designed to scale up the number of districts toward a statewide implementation of the innovative assessment system was provided (e.g., recruitment activities). 2. A plan and timeline for conducting research studies in response to the recommendations from the external evaluation was provided. (This may also be addressed in the information requested in (e)(1) below.)
<p>(c)(2) The adequacy of the project budget for the duration of the requested demonstration authority period, including Federal, State, local, and non-public sources of funds to support and sustain, as applicable, the activities in the timeline under paragraph (c)(1) of this section, including--</p> <p>(i) How the budget will be sufficient to meet the expected costs at each phase of the SEA’s planned expansion of its innovative assessment system; and</p> <p>(ii) The degree to which funding in the project budget is contingent upon future appropriations at the State or local level or additional commitments from non-public sources of funds.</p>	<p>NH DOE must provide:</p> <ol style="list-style-type: none"> 1. A projected budget for each year of the demonstration authority period considered in the application. 2. A projected budget for planned evaluation activities (see also (e)(1) below).
<p>(d)(1) The extent to which the SEA or consortium has developed, provided, and will continue to provide training to LEA and school staff, including teachers, principals, and other school leaders, that will familiarize them with the</p>	<p>NH DOE must provide:</p> <ol style="list-style-type: none"> 1. A description of the training or support that is provided to PACE teachers regarding their

Application selection criteria	Required information from the SEA
<p>innovative assessment system and develop teacher capacity to implement instruction that is informed by the innovative assessment system and its results;</p>	<p>making appropriate linkages between the student performance on the assessment tasks and instruction in class.</p> <p>2. A description of the specific training requirements that all participating PACE teachers must complete prior to administering pilot assessments. This description should include information regarding teachers who do not complete required training in terms of PACE participation.</p>
<p>(d)(2) The strategies the SEA or consortium has developed and will use to familiarize students and parents with the innovative assessment system;</p>	<p>NH DOE must provide:</p> <ol style="list-style-type: none"> 1. A description of standardized collateral materials about PACE and standardized recommendations to support LEAs in communicating with parents about PACE. This information should reference the information requested under (a)(1) above. 2. A description of how the State and LEAs will familiarize students with the PACE, in terms of both how the tasks and rubrics work in practice as well as how their performance on the tasks accrues to an annual proficiency score. This information should reference the information requested under (a)(1) above.
<p>(d)(3) The strategies the SEA will use to ensure that all students and each subgroup of students under section 1111(c)(2) of the Act in participating schools receive the support, including appropriate accommodations consistent with 34 CFR part 200.6(b) and (f)(1)(i) and section 1111(b)(2)(B)(vii) of the Act, needed to meet the challenging State academic standards under section 1111(b)(1) of the Act;</p>	<p>NH DOE must clearly describe teachers will receive training and support in implementing appropriate accommodations when administering performance tasks.</p>
<p>(d)(4) If the system includes assessment items that are locally developed or locally scored, the strategies and safeguards (e.g., test blueprints, item and task</p>	<p>NH DOE must provide:</p> <ol style="list-style-type: none"> 1. Evidence that sufficient quality control

Application selection criteria	Required information from the SEA
<p>specifications, rubrics, scoring tools, documentation of quality control procedures, inter-rater reliability checks, audit plans) the SEA or consortium has developed, or plans to develop, to validly and reliably score such items, including how the strategies engage and support teachers and other staff in designing, developing, implementing, and validly and reliably scoring high-quality assessments; how the safeguards are sufficient to ensure unbiased, objective scoring of assessment items; and how the SEA will use effective professional development to aid in these efforts.</p>	<p>procedures exist for the scoring of local tasks which are equivalent to quality control processes used for scoring common tasks (this may be partially addressed by information requested under (4)(i) and (a)(2) above).</p> <p>2. Evidence of a process where all locally developed tasks and assessments are reviewed for quality (such as by another educator). This evidence should address how the local task review process is consistent with professional standards and practice for student assessment.</p>
<p>(e)(1) The strength of the proposed evaluation of the innovative assessment system included in the application, including whether the evaluation will be conducted by an independent, experienced third party, and the likelihood that the evaluation will sufficiently determine the system’s validity, reliability, and comparability to the statewide assessment system consistent with the requirements of 34 CFR part200.105(b)(4) and (9);</p>	<p>NH DOE must provide a specific plan and timeline to conduct an external evaluation of the innovative assessment system during the course of the demonstration period.</p>
<p>(e)(2) The SEA’s or consortium’s plan for continuous improvement of the innovative assessment system, including its process for--</p> <p>(i) Using data, feedback, evaluation results, and other information from participating LEAs and schools to make changes to improve the quality of the innovative assessment; and</p> <p>(ii) Evaluating and monitoring implementation of the innovative assessment system in participating LEAs and schools annually.</p>	<p>NH DOE must provide:</p> <p>1. A description of how it will monitor how continuous improvement feedback is implemented by participating PACE LEAs (this includes feedback from activities requested under (a)(2) above).</p> <p>2. A description of how it will annually assess the satisfaction and attitudes of educators in participating PACE LEAs regarding PACE activities (this may be part of the external evaluation plan requested in (e)(1) above).</p>