



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Pam Stewart
Commissioner
Florida Department of Education
Turlington Building, Suite 1514
325 West Gaines Street
Tallahassee, FL 32399

May 18, 2018

Dear Commissioner Stewart:

Thank you for your participation in the U.S. Department of Education's (the Department) assessment peer review process under Title I of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the No Child Left Behind Act of 2001 (NCLB), which governed State assessments through the 2016-2017 school year. The Every Student Succeeds Act (ESSA), which governs State assessments beginning in the 2017-2018 school year, 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 with a few additional requirements. I appreciate the efforts of the Florida Department of Education (FLDOE) to prepare for the peer review, which occurred in February 2018 and which was a follow up to a review that occurred in 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 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 FLDOE's submission and the Department found, based on the evidence received, that the components of your assessment system meet most, 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 (Florida Standards Assessment (FSA)): **Substantially meets requirements of the ESEA, as amended by the NCLB and ESSA.**
- R/LA and mathematics general assessments in high school (FSA End of Course (FSA-EOC)): **Substantially meets requirements of the ESEA, as amended by the NCLB and ESSA.**

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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.

- Science general assessments in grade bands 3-5 and 6-8 (Florida Comprehensive Assessment Test 2.0 (FCAT 2.0)): **Substantially meets requirements of the ESEA, as amended by the NCLB and ESSA.**
- Science general assessments in high school (FCAT 2.0-Biology 1 End of Course (FCAT 2.0 Biology EOC)): **Substantially meets requirements of the ESEA, as amended by the NCLB and ESSA.**

Assessments that **substantially meet the requirements of the ESEA, as amended by NCLB** meet most of the requirements of the statute and regulations but some additional information is required. The Department expects that FLDOE may be able to provide this additional information within one year. The specific list of items required for FLDOE to submit is enclosed with this letter. Because the State has not fully satisfied the condition placed on the State's Title I, Part A grant award related to its State assessment system, the Department is continuing to place a condition on the State's Title I, Part A grant award related to those components of the assessment system. To satisfy this condition, FLDOE must submit satisfactory evidence to address the items identified in the enclosed list. FLDOE 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.

Please note that the assessment requirements for ESEA, as amended by the NCLB, were in effect through the end of the 2016-2017 school year. The FLDOE peer review was conducted under the requirements of this statute. Beginning in the 2017-2018 school year, the assessment requirements of the ESEA, as amended by the ESSA will apply to State assessments. Given that this review began under the requirements of the ESEA as amended by the NCLB, it is important to indicate that while the FLDOE assessments meet most of the peer review guidance criteria under the NCLB, the State is still responsible to ensure that these assessments also comply with the requirements of the ESSA. Department staff have carefully reviewed FLDOE evidence and peer review recommendations in light of the updated requirements for State assessments under the ESEA, as amended by the ESSA. As a result of this additional review, I have determined that the FLDOE assessments submitted for peer review at this time have met the new requirements of ESEA, as amended by the ESSA.

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 Brenda Calderon of my staff at: OSS.Florida@ed.gov.

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: Jane Fletcher, Assistant Deputy Commissioner
Vince Verges, Assistant Deputy Commissioner

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

Critical Element	Additional Evidence Needed
1.4 – Policies for Including All Students in Assessments	<p>For all parts of its assessment system:</p> <ul style="list-style-type: none"> Evidence that all students with disabilities who are publicly placed in private schools as a means of providing special education are included in the assessment system.
2.4 – Monitoring Test Administration	<p>For all parts of its assessment system,:</p> <ul style="list-style-type: none"> Evidence that it monitors the administration of its State assessments to ensure that standardized test administration procedures are implemented with fidelity across districts and schools (e.g., an explanation of how Florida Department of Education (FLDOE) monitors, description of how local educational agencies (LEAs) are selected for monitoring, monitoring schedules, roles and responsibilities of key personnel, etc.).
3.1 – Overall Validity, including Validity Based on Content	<p>For the reading/language arts (R/LA) general assessments in grades 3-8 Florida Standards Assessment (FSA) and high school (FSA End of Course (FSA-EOC)):</p> <ul style="list-style-type: none"> Evidence of alignment of the writing assessment to standards in grades 4-8 and high school (e.g., an independent alignment study or other strong evidence that demonstrates this alignment).
3.2 – Validity Based on Cognitive Processes	<p>For the R/LA general assessments in grades 3-8 (FSA) and high school (FSA-EOC) and for the science general assessments in grade bands 3-5, 6-8 and high school EOC (Florida Comprehensive Assessment Test 2.0 (FCAT 2.0)) and FCAT 2.0 Biology EOC):</p> <ul style="list-style-type: none"> Evidence that its assessments tap the intended cognitive processes appropriate for each grade level as represented in the FLDOE academic content standards (e.g., through cognitive labs of illustrative task types, expert judgment of what cognitive skills are being measured, or empirical data that shows the relationship between item responses and other assessments that measure intended processes).
4.6 – Multiple Versions of an Assessment	<p>For the R/LA and mathematics general assessments in grades 3-8 (FSA) and high school (FSA-EOC),:</p> <ul style="list-style-type: none"> Evidence of the comparability of the FSA tests across the most frequently used platforms (e.g., computers, tablets) for at least one grade level test.
5.3 - Accommodations	<p>For the R/LA and mathematics general assessments in grades 3-8 (FSA) and high school (FSA-EOC) and for the science general assessments in grade bands 3-5, 6-8 and high school EOC (FCAT 2.0 and FCAT 2.0 Biology EOC):</p> <ul style="list-style-type: none"> Evidence to show that accommodations are appropriate and effective, do not alter the construct, allow meaningful interpretation of results and comparisons.
5.4 – Monitoring Test Administration for Special Populations	<p>For all parts of its assessment system:</p> <ul style="list-style-type: none"> Evidence that the State has procedures, policies, and resources that support LEAs in providing required monitoring of test administration of special populations (e.g., monitoring instructions and checklists, etc.). Evidence that FLDOE reviews/evaluates the monitoring of test administration for special populations by LEAs.

Critical Element	Additional Evidence Needed
6.4 – Reporting	For the R/LA and mathematics general assessments in grades 3-8 (FSA) and high school (FSA-EOC), FLDOE must provide: <ul style="list-style-type: none"><li data-bbox="479 268 1372 333">• Evidence of current individual student reports that shows student achievement in terms of State grade-level achievement standards.

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

February 2018 State Assessment Peer Review Notes Resubmission



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.

STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

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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.

STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

SECTION 1: STATEWIDE SYSTEM OF STANDARDS AND ASSESSMENTS

Critical Element—REVIEWED BY DEPARTMENT STAFF ONLY	Evidence —REVIEWED BY DEPARTMENT STAFF ONLY (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence — REVIEWED BY DEPARTMENT STAFF ONLY
<p>1.4 – Policies for Including All Students in Assessments (from 2016 review) FLDOE must provide:</p> <ul style="list-style-type: none"> o Evidence that all students with disabilities who are publicly placed in private schools as a means of providing special education are included in the assessment system. 	<ul style="list-style-type: none"> • Section 1002.39, Florida Statutes – The John M. McKay Scholarships for Students with Disabilities Program. (Pages 8 and 9) • Section 1002.395, Florida Statutes – Florida Tax Credit Scholarship Program. (Pages 3 and 5) 	<p>FDOE admits that it cannot offer evidence that this requirement has been met.</p> <p>“Rationale for Additional Evidence: Section 1002.39(5)(f), Florida Statute does not require that students with disabilities publicly placed in private schools as a means of providing special education be included in the assessment system. A change in state statute would be needed in order to require that parents have their students assessed on the statewide assessment.”</p> <p>It is clear from both of the statutes provided that students enrolled in public schools (presumably whether they are placed there by the parents or publicly placed—neither statute appears to make a distinction) take assessments at the discretion and choice of parents. Taking the State assessment is an option, not a requirement.</p> <p>Absent a change in State Law, Florida does not meet this requirement.</p>
<p>Section 1.4 Summary Statement-REVIEWED BY DEPARTMENT STAFF ONLY</p>		
<p><u> </u>X_ The following additional evidence is needed/provide brief rationale: Given that State law allows parents of students in private schools to decide if they want their children to take State assessment, Florida would need to provide evidence of a change in State law to meet the requirement that all students with disabilities who are publicly placed in private schools as a means of providing special education are included in the assessment system.</p>		

SECTION 2: ASSESSMENT SYSTEM OPERATIONS

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.

STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>2.1 – Test Design and Development (2016 Review) For the R/LA general assessments in grades 3-8 (FSA) and high school (FSA-EOC), FLDOE must provide:</p> <ul style="list-style-type: none"> • Evidence that the assessment design measures the full breadth and depth of the State’s academic content standards in R/LA, including the speaking and listening aspect of the standards for all grades. • Evidence that the R/LA standards for writing are measured in the grade 3 FSA. 	<p>From template:</p> <p>Rationale for Additional Evidence: With respect to writing and listening in Grade 3 and speaking in all tested grades, sec. 1111(b)(2)(A) states that, “Each State plan shall demonstrate that the State educational agency, in consultation with local educational agencies, has implemented a set of high quality student academic assessments in mathematics, reading or language arts, and science.” Given the flexibility in the law that allows states to assess reading or language arts, and given the state’s desire to minimize testing time to the greatest extent possible, especially for younger students, Florida’s assessments submitted for peer review include writing and listening in grades 4–10. However, it is important to note that the assessments in grades 3–10 each measure a fuller range of the state’s standards beyond those of just the reading standards. Therefore, it is Florida’s position that the assessments meet the requirements with respect to measuring the standards as set forth in this Critical Element.</p>	<p>The state argues that the law does not require assessing writing or listening in grade 3 or speaking at any grade level; therefore, no evidence was submitted for these assessment components.</p> <p>Although the state does not extend this argument to assessing listening in grades 4-8, no evidence was submitted to show that the state assessed the listening aspect of the standards in grades 4-8.</p> <p>No evidence of a waiver was submitted.</p>
<p>Section 2.1 Summary Statement</p>		
<p>X No additional evidence is required (per USED change in expectations for this Critical Element) or</p>		

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STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>2.2 – Item Development (2016 Review) For the R/LA general assessments in grades 3-8 (FSA) and high school (FSA-EOC), FLDOE must provide:</p> <ul style="list-style-type: none"> • Evidence of reasonable and technically sound procedures to develop and select items to assess student achievement based on FLDOE grade 3 academic content standards for writing. This evidence should address both content and cognitive process, and higher-order thinking skills. • Evidence of reasonable and technically sound procedures to develop and select items to assess student achievement based on FLDOE academic content standards for speaking and listening for all grades. This evidence should address both content and cognitive process, as well as higher-order thinking skills. 		<p>See critical element 2.1.</p>
<p>Section 2.2 Summary Statement</p>		
<p>X No additional evidence is required (per USED change in expectations for this Critical Element) or</p>		

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STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

Critical Element—REVIEWED BY DEPARTMENT STAFF ONLY	Evidence —REVIEWED BY DEPARTMENT STAFF ONLY(Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence — REVIEWED BY DEPARTMENT STAFF ONLY
<p>2.4 – Monitoring Test Administration(2016 review)</p> <p>For all parts of its assessment system, FLDOE must provide:</p> <ul style="list-style-type: none"> Evidence that it monitors the administration of its State assessments to ensure that standardized test administration procedures are implemented with fidelity across districts and schools. 	<p>ELA & Math:</p> <ul style="list-style-type: none"> Sample Emails, FSA FSA Help Desk Call Log, 04-15-15 FSA Help Desk Call Log, 04-16-15 <p>Science:</p> <ul style="list-style-type: none"> Sample Emails, NGSSS May 2015 Customer Support Analysis Report, Pearson Pearson Call Tickets by Subject and Reason, 05-15-15 Pearson Call Tickets by Subject and Reason, 05-19-15 <p>ELA, Mathematics, and Science:</p> <ul style="list-style-type: none"> Sample of notification of suppression of test results pending investigation of testing irregularity Sample of notification of closure of testing irregularity investigation <p>Rationale for Additional Evidence: Call logs and emails show that FLDOE, in cooperation with the respective vendors, took daily action to monitor and ensure that tests were administered with fidelity. Emails and letters regarding test irregularity provide samples that show that Florida uses Caveon as a formal third party reviewer to identify test irregularities that are then referred to our Office of the Inspector General for further formal follow up and investigation in conjunction with the school district.</p>	<p>Emails and log of problems/resolutions indicate that FDOE and its vendors are addressing problems with test administration as they come up, but FDOE has not provided evidence of any policy or procedure documents (summary explanation for how it monitors, explanation for how districts are selected, monitoring schedules, roles and responsibilities of key personnel, etc.) that cover or explain this process. It has not explained how or if it is monitoring schools in any systematic way that would result in fidelity of implementation.</p> <p>FDOE has provided some instructional manuals and other documents that it distributes to LEAs explaining how the LEA should administer assessments of various kinds, but it is unclear how or if FDOE monitors whether or not the instructions are followed.</p> <p>FDOE has provided information on invalidation results in the most recent year of test administration, but it is not clear how these results are used by FDOE to improve assessment administration. FDOE indicates that results are turned over to the IG, but does not explain what happens after that.</p>

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.

STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

Critical Element—REVIEWED BY DEPARTMENT STAFF ONLY	Evidence —REVIEWED BY DEPARTMENT STAFF ONLY(Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence — REVIEWED BY DEPARTMENT STAFF ONLY
Section 2.4 Summary Statement—REVIEWED BY DEPARTMENT STAFF ONLY		
<p><input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale: Evidence that FDOE monitors the administration of its State assessments to ensure that standardized test administration procedures are implemented with fidelity across districts and schools.</p>		

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.

STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

SECTION 3: TECHNICAL QUALITY – VALIDITY

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>3.1 – Overall Validity, including Validity Based on Content For the R/LA general assessments in grades 3-8 (FSA) and high school (FSA-EOC), FLDOE must provide:</p> <ul style="list-style-type: none"> • Evidence of alignment of the writing assessment to standards in all grades. • Evidence that all R/LA standards, including speaking and listening at all grades, are assessed. 	<ul style="list-style-type: none"> • FSA Writing Professional Development • FSA ELA Writing Alignment Peer Review: <ul style="list-style-type: none"> ○ Content Advisory Invitations ○ Content Advisory Letter ○ Content Advisory Feedback Survey Results ○ Writing Passage and Prompt Review Rating Forms Gr4_7 ○ Writing Passage and Prompt Review Rating Forms Gr8_11 	<p>The evidence submitted for the alignment of the writing assessment to the standards for grades 4-8 and EOC was based on a department-run content advisory committee WebEx meeting with the stated purpose of providing “feedback regarding the rubric language and alignment to the standards” (Content Advisory Letter). This meeting does not constitute an independent alignment analysis sufficient to establish evidence of validity based on content. The process was not consonant with typical alignment studies.</p> <p>In addition to the review not being an independent or complete study that focused on alignment of the items/rubrics to standards, the results of the review process were not summarized in any manner that addressed the alignment of the assessments to academic content standards. An analysis/summary of the Writing Passage and Prompt Review Rating Forms Gr4_7 / Gr8_11 should be provided. The analysis/summary data should be linked to writing passages, prompts, and state standards. In grades 4-11, there is no analysis of alignment between the assessments and the standards.</p> <p>See critical element 2.1 for Grade 3 writing and for listening and speaking.</p> <p>Recommendation: An independent, technically sound alignment study is needed to demonstrate that the writing assessments are aligned to academic content standards.</p>

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STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
Section 3.1 Summary Statement		
<p>X The following additional evidence is needed/provide brief rationale: For the R/LA general assessments in grades 3-8 (FSA) and high school (FSA-EOC), FLDOE must provide:</p> <ul style="list-style-type: none"> • Evidence of alignment of the writing assessment to standards in grades 4-8 and high school. 		

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.

STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>3.2 – Validity Based on Cognitive Processes For the R/LA general assessments in grades 3-8 (FSA) and high school (FSA-EOC) and for the science general assessments in grade bands 3-5, 6-8 and high school EOC (FCAT 2.0 and FCAT 2.0 Biology EOC), FLDOE must provide:</p> <ul style="list-style-type: none"> • Evidence that its assessments tap the intended cognitive processes appropriate for each grade level as represented in the FLDOE academic content standards (e.g., through cognitive labs of illustrative task types, expert judgment of what cognitive skills are being measured, or empirical data that shows the relationship between item responses and other assessments that measure intended processes). 	<p>ELA & Math:</p> <ul style="list-style-type: none"> • FSA ELA Reading Passage and Item Rating Form Template, Grades 4–10 • 2015 Item Review Grade 8 ELA Sample Rating Forms • 2015 Item Review Grade 9 ELA Sample Rating Forms • Field Test Summary of Item Review, All ELA Items • FSA ELA Writing Alignment Peer Review: <ul style="list-style-type: none"> ○ Content Advisory Invitations <p>Content Advisory Letter</p> <ul style="list-style-type: none"> ○ Content Advisory Feedback Survey Results ○ Writing Passage and Prompt Review Rating Forms Gr4_7 ○ Writing Passage and Prompt Review Rating Forms Gr8_11 <p>Science:</p> <ul style="list-style-type: none"> • 2014 Item Rating Forms, Biology 1 • 2014 Item Rating Forms, Grade 5 Science • 2014 Item Rating Forms, Grade 8 Science • Test Item Specifications Appendix A, Biology 1 • Test Item Specifications Appendix A, Grade 5 Science • Test Item Specifications Appendix A, Grade 8 Science 	<p><u>Grades 3-8, General</u> 2014–2015 FSA Technical Report, Addendum, pgs. 2– 3 & 6–11 does not address 3.2; it is designed to address 3.4, 4.1, 4.6, 5.3</p> <p><u>Grades 3-8 and EOC, R/LA</u> “FSA ELA Reading Passage and Item Rating Form Template, Grades 4-10” contains a blank review form, and “2015 Item Review Grade 8 [Grade 9] ELA Sample Rating Forms” contains completed reading passage and item rating forms for Grades 3-8. These forms do not probe whether the intended cognitive processes are required (Aligned to Standard? question is not sufficient evidence).</p> <p>“Field Test Summary of Item Review, All ELA Items” is an Excel file containing a list of 1,517 items with review notes. No summary of ratings is provided, nor is there an overview/discussion of process, reviewers, etc. No discussion of how these ratings support validity based on cognitive processes is provided.</p> <p>Similarly, the files addressing writing prompt review, “Writing Passage and Prompt Review Rating Forms Gr4_7 [Gr8_11]” and “Content Advisory Feedback Survey Results,” do not include review information related to whether the task taps the intended cognitive processes.</p> <p><u>Grades 3-8 Science</u> “2014 Item Rating Forms, Grade 5 [8] Science” contain completed science item rating forms for</p>

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Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		<p>Grades 5 and 8. These forms do not probe whether the intended cognitive processes are required (Measures Benchmark is not sufficient evidence). “Test Item Specifications Appendix A, Grade 5 [8] Science” contains directions for item review.</p> <p>No summary of ratings is provided, nor is there an overview/discussion of process, reviewers, etc. No discussion of how these ratings support validity based on cognitive processes is provided.</p> <p><u>EOC Biology</u> The rating forms, “2014 Item Rating Forms, [Content Area(s)],” and instructions, “Test Item Specifications Appendix A, Biology 1,” submitted are similar to those for Grades 3-8; these forms do not probe whether the intended cognitive processes are required (Measures Standard and Measures Benchmark are not sufficient evidence).</p> <p>“2015 FCAT 2.0 & FL EOC Technical Report, Yearbook,” pg. 64 does not relate to cognitive processes.</p> <p>No summary of ratings is provided, nor is there an overview/discussion of process, reviewers, etc. No discussion of how these ratings support validity based on cognitive processes is provided.</p> <p>Recommendation for compiling/presenting evidence related to validity: In general, any evidence collected should be documented in the technical manual, and the relationship of the evidence to the</p>

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STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

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		validity argument for the assessment should be shown. For example, if experts had reviewed items or illustrative items for the purpose of describing the cognitive skills tapped by the items, the evidence would include a description of the process and goals, the qualifications of the panelists, the specific questions asked/discussed and how they related to validity, a summary of results, and how the results support or lead to further questions regarding validity related to cognitive processes. Similarly, if cognitive labs had been held using illustrative items, the cognitive lab process, student sample, the relationship of questions to the validity argument, the rationale for selecting sample and items, etc., and a summary of results and how they shed light on validity should all be described.
Section 3.2 Summary Statement		
<p>X The following additional evidence is needed/provide brief rationale:</p> <p>For the R/LA general assessments in grades 3-8 (FSA) and high school (FSA-EOC) and for the science general assessments in grade bands 3-5, 6-8 and high school EOC (FCAT 2.0 and FCAT 2.0 Biology EOC), FLDOE must provide:</p> <ul style="list-style-type: none"> Evidence that its assessments tap the intended cognitive processes appropriate for each grade level as represented in the FLDOE academic content standards (e.g., through cognitive labs of illustrative task types, expert judgment of what cognitive skills are being measured, or empirical data that shows the relationship between item responses and other assessments that measure intended processes). 		

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.

STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>3.4 – Validity Based on Relationships with Other Variables For the R/LA and mathematics general assessments in grades 3-8 (FSA) and high school (FSA-EOC)), FLDOE must provide:</p> <ul style="list-style-type: none"> Validity evidence that shows the State’s assessment scores are related as expected with criterion and other variables for all student groups (e.g., comparison of subscore relationships within content areas to those across content areas; a confirmatory factor analysis of math & R/LA together; or other analyses that demonstrate positive correlations between State assessment results and external measures that assess similar constructs). 	<ul style="list-style-type: none"> Relating STAR Reading™ and STAR Math™ to the Florida Standards Assessments (FSA) Performance, Renaissance Concordant and Comparative Scores of Alternative Tests for Florida Graduation Requirements (DRAFT), Buros 2014–2015 FSA Technical Report, Addendum, pgs. 2– 3 & 6–11 	<p><u>Grades 3-8, R/LA and Math</u> Tables 1-12 in “2014–2015 FSA Technical Report, Addendum” display the observed and disattenuated correlation between subscores in math and R/LA. The patterns of correlations are “consistent with the a-priori expectation that subscores within a test correlate more highly than correlations between tests measuring a different construct with a few small notes.” (p. 3).</p> <p><u>EOC Algebra 1 and R/LA</u> The “Concordant and Comparative Scores of Alternative Tests for Florida Graduation Requirements (DRAFT), Buros” file reports correlations between EOC Grade 10 R/LA scores and ACT, SAT, PSAT, and PERT ELA/Reading scores (p. 4) and between EOC Algebra 1 scores and ACT, SAT, PSAT, and PERT math scores (p. 6). Although the state did not submit information about how these correlations support their validity argument, they were within a reasonable range for both subject areas, providing evidence of convergence with tests of similar subject matter.</p> <p>Similarly, “Relating STAR Reading and STAR Math to the Florida Standards Assessments, Renaissance” contains correlations between STAR scores and FSA scores (p. 8 and p. 9). Again, the correlations were within a reasonable range for both subject areas; however, the state did not submit information about how these correlations support their validity argument.</p> <p>There was no explanation of how “Buros Center</p>

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STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		<p>for Testing Alignment Study Full Report” relates to this critical element.</p> <p>Recommendation: In order to meet professional standards, the state should include these results (or refer to them) in its technical report and indicate how they provide evidence supporting the state’s validity framework/argument.</p>
Section 3.4 Summary Statement		
X_ No additional evidence is required		

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STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

SECTION 4: TECHNICAL QUALITY - OTHER

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>4.1 – Reliability For the R/LA and mathematics general assessments in grades 3-8 (FSA) and high school (FSA-EOC), FLDOE must provide:</p> <ul style="list-style-type: none"> Evidence of decision consistency for all tests. 	<ul style="list-style-type: none"> 2014–2015 FSA Technical Report, Addendum, pgs. 3 & 13–14 2014–2015 FSA Technical Report, Vol. 7, pgs. 18–23 	<p>The addendum states “the psychometric literature does commonly denote the Rudner approach (2001) as classification consistency.” There was no evidence showing that the field considers Rudner’s approach a measure of classification/decision consistency (e.g., citations), and Rudner himself (2001) describes the approach as measuring classification accuracy. Additionally, the description of the approach in the addendum, “we find the degree to which a student’s true score and observed score would fall within the same performance level” describes decision accuracy (observed vs. true). Decision consistency relates to observed vs. observed scores (how consistently an examinee would be classified into a category over replications).</p> <p>The 2014-2015 FSA Technical Report, Volume 7, Classification Accuracy section, pages 2-4 provides information on the classification accuracy by performance levels for grades 3-8 (FSA) and high school (FSA-EOC). The classification accuracy for all grades and performance levels was 0.883 or greater.</p> <p>However, since the relationship between the two metrics (decision accuracy and decision consistency) is strong, decision consistency is likely to be adequate.</p>

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STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
Section 4.1 Summary Statement		
X No additional evidence is required		

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STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>4.6 – Multiple Versions of an Assessment For the R/LA and mathematics general assessments in grades 3-8 (FSA) and high school (FSA-EOC) and for the science general assessments in grade bands 3-5, 6-8 and high school EOC (FCAT 2.0 and FCAT 2.0 Biology EOC), FLDOE must provide:</p> <ul style="list-style-type: none"> Evidence of the comparability of the FSA tests across the most frequently used platforms (e.g., computers, tablets) for at least one grade level test. 	<p>Device Compatibility:</p> <ul style="list-style-type: none"> Device Comparability of Tablets and Computers for Assessment Purposes, NCME Florida TestNav 8 Browser and OS Analytics, Pearson Florida TN8 Analytics Overview, Pearson Score Comparability across Computerized Assessment Delivery Devices, CCSSO Device Comparability Score Range and Subgroup Analyses, Pearson Spring 2015 Digital Devices Comparability Research Student, PARCC 2014–2015 FSA Technical Report, Addendum, pg. 3 	<p>“Device Comparability of Tablets and Computers for Assessment Purposes, NCME” is a study of score comparability across tablets and computers in HS math, science, and ELA, but not for Florida tests; results indicate no device effects. “Device Comparability Score Range and Subgroup Analyses, Pearson” is a further analysis of the data in the prior study and showed a small device effect at the middle to lower parts of the score distribution, but this effect was judged to be minimal. It is not clear how this research provides evidence for this Critical Element.</p> <p>“Florida TestNav 8 Browser and OS Analytics, Pearson” and “Florida TN8 Analytics Overview, Pearson” show that a variety of browsers are used in the state – it is not clear how this provides evidence for this Critical Element.</p> <p>“2014–2015 FSA Technical Report, Addendum, pg. 3” states that care is taken to ensure items render in the same way across platforms and cites the same research results as cited above as they are reported in “Score Comparability across Computerized Assessment Delivery Devices, CCSSO.” No evidence is provided that item rendering is comparable across devices.</p> <p>The state makes no effort to tie these research results to assertions that scores on devices used in their state assessments are comparable.</p>

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STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		<p>Recommendation The state should include a section on score comparability across devices in its technical manual, citing research and rationales for determining that scores are comparable (including professional judgment/best practice and any research showing that device familiarity is the key component in producing comparable scores). This section should also include information on how presentation and response modes are kept similar, in terms of important aspects of these, across devices.</p>
<p>Section 4.6 Summary Statement</p>		
<p>X The following additional evidence is needed/provide brief rationale: For the R/LA and mathematics general assessments in grades 3-8 (FSA) and high school (FSA-EOC), FLDOE must provide:</p> <ul style="list-style-type: none"> • Evidence of the comparability of the FSA tests across the most frequently used platforms (e.g., computers, tablets) for at least one grade level test. 		

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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Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>5.3 – Accommodations For the R/LA and mathematics general assessments in grades 3-8 (FSA) and high school (FSA-EOC) and for the science general assessments in grade bands 3-5, 6-8 and high school EOC (FCAT 2.0 and FCAT 2.0 Biology EOC), FLDOE must provide:</p> <ul style="list-style-type: none"> Evidence to show that accommodations are appropriate and effective, do not alter the construct, allow meaningful interpretation of results and comparisons. 	<ul style="list-style-type: none"> Interagency Agreement 391, FIMC-VI 2012–15 Interagency Agreement 391 - Amendment 1, FIMC- VI 2012–15 Sample Emails: These demonstrate FIMC comments and recommendations, as well as FDOE/TDC feedback, for braille notes, test items, and directions. 2014–2015 FSA Technical Report, Addendum, pgs. 2– 3 & 6–11 [pp3-4] <p>Rationale for Additional Evidence: Included are reliability coefficients for SWD vs. Non-SWD students, plus Cronbach Alpha’s for subscores between online and accommodated forms. These are available in the Technical Report, Vol. 4: Appendix A, Reliability Coefficients.</p> <p>Statewide assessments, including special forms such as braille, are reviewed by an independent third-party, the Florida Instructional Materials Center for the Visually Impaired (FIMC-VI). Evidence is included to show this relationship, and the kinds of input provided by FIMC-VI.</p>	<p>It is not clear what parts of “2014–2015 Florida Statewide Assessments Production Specifications, NGSSS” and “2014–2015 Florida Statewide Assessments Production Specifications, FSA” were intended to serve as evidence for this Critical Element. These documents refer to forms production, which includes some accommodated forms, but these documents are not tied to the idea that accommodated forms are appropriate and effective, do not alter the construct, and allow meaningful interpretation of results and comparisons.</p> <p>“2014–2015 FSA Technical Report, Vol. 4, Appendix A: Reliability Coefficients, pgs. A1–A3, A4–A10”: Reliability coefficients for Students With Disabilities (SWD) vs. non-SWDs does not provide evidence for this Critical Element, since many SWDs do not use accommodations. The reliabilities are not shown for students who received accommodations vs. students who did not use accommodations. No differentiation among different types of accommodations is provided. There is no discussion of how the reliability coefficients for subscores on online and accommodated forms supports the contention that accommodations are appropriate and effective, do not alter the construct, and allow meaningful interpretation of results and comparisons.</p> <p>“2014–2015 FSA Technical Report, Addendum,” (pp 3-4) states that the accommodation of a paper form is constructed to the same test specifications as the online form, often using the same items; information about how scores on the paper form are</p>

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Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		<p>determined so that they are comparable to scores on the online form was not provided.</p> <p>Evidence submitted about braille forms development (interagency agreements, emails) indicates that attention is paid to maintaining the integrity of the assessed construct in braille forms. However, not enough detail (e.g., spreadsheets) of what is being reviewed was provided.</p> <p>No information about the appropriateness, etc., of accommodations that are not forms-based (e.g., masking, text-to-speech, etc. See <i>Accommodations for Florida's Statewide Student Assessments</i> provided with original submission, for full list.) is provided.</p> <p>Overall, the information provided was for a narrow slice of accommodations offered and was not sufficient for the few accommodations referenced in evidence.</p> <p>Recommendation: The state could provide evidence of this critical element by citing research conducted by other states or by organizations such as NCEO; and/or by citing best practice or typical and accepted practices in educational assessment; and by providing a solid rationale for using these sources as evidence. For forms-based accommodations, evidence could include how forms are scored to make the scores comparable to those on the base form (e.g., what is the evidence that braille scores or paper-based scores are comparable to online scores if the items are not the same?).</p>

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STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		<p>Recommendation: The technical manual could include the general process for the development of special forms, including QA processes and a description of the expertise of people involved. Such a section in the technical report could serve as evidence of how the special forms are developed to maintain the construct.</p>
<p>Section 5.3 Summary Statement</p>		
<p>X The following additional evidence is needed/provide brief rationale: For the R/LA and mathematics general assessments in grades 3-8 (FSA) and high school (FSA-EOC) and for the science general assessments in grade bands 3-5, 6-8 and high school EOC (FCAT 2.0 and FCAT 2.0 Biology EOC), FLDOE must provide: Evidence to show that accommodations are appropriate and effective, do not alter the construct, allow meaningful interpretation of results and comparisons.</p>		

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.

STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>5.4 – Monitoring Test Administration for Special Populations For all parts of its assessment system, FLDOE must provide:</p> <ul style="list-style-type: none"> Evidence that the State has procedures, policies, and resources that support districts in providing required monitoring of test administration of special populations (e.g., monitoring instructions and checklists, etc.); and Evidence that FLDOE reviews/evaluates the monitoring of test administration for special populations by LEAs. 	<p>ELA & Math:</p> <ul style="list-style-type: none"> Sample Emails, FSA FSA Help Desk Call Log, 04-15-15 FSA Help Desk Call Log, 04-16-15 <p>Science:</p> <ul style="list-style-type: none"> Sample Emails, NGSSS May 2015 Customer Support Analysis Report, Pearson Pearson Call Tickets by Subject and Reason, 05-15-15 Pearson Call Tickets by Subject and Reason, 05-19-15 <p>Sample Emails, General Accommodations: These demonstrate evidence of FDOE monitoring test administrations for SWDs.</p> <p>Florida School for the Deaf and the Blind (FSDB) Site Visit:</p> <ul style="list-style-type: none"> FSDB ASL Video Review Site Visit, Invitation FSDB ASL Video Review Site Visit, Agenda FSDB ASL Video Review Site Visit, Meeting Specs 	<p>The evidence submitted did not address this Critical Element.</p> <p>The emails submitted as evidence showed the state providing support for districts when problems or questions occurred regarding providing accommodations during testing, rather than showing any systematic monitoring efforts. The files of Pearson call tickets document that the contractor responds to LEA/school questions. Neither set of documents is evidence of the existence of procedures, policies, and resources that support districts in monitoring administrations of special populations nor evidence that the state reviews/evaluates LEA monitoring.</p> <p>The documents relating to the ASL Video are not evidence that the state has procedures, policies, and resources that support districts in monitoring administrations of special populations nor evidence that the state reviews/evaluates LEA monitoring. (Note: This might be an appropriate piece of evidence for Critical Element 5.3.)</p> <p>No evidence was submitted that documented the FLDOE monitored districts to ensure that districts were providing appropriate accommodations on state assessments.</p> <p>Recommendation Examples of appropriate evidence could include: a monitoring policy/plan/guidance provided to LEAS; a schedule of surprise audits that reviewed IEPs and accommodations provided during testing;</p>

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STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		comparison of classroom accommodations, IEPs, and accommodations marked in the online testing platform. A summary of these audits and comparison should be provided.
Section 5.4 Summary Statement		
<p>X The following additional evidence is needed/provide brief rationale: For all parts of its assessment system, FLDOE must provide:</p> <ul style="list-style-type: none"> • Evidence that the State has procedures, policies, and resources that support districts in providing required monitoring of test administration of special populations (e.g., monitoring instructions and checklists, etc.); and • Evidence that FLDOE reviews/evaluates the monitoring of test administration for special populations by LEAs. 		

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SECTION 6: ACADEMIC ACHIEVEMENT STANDARDS AND REPORTING

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>6.4 – Reporting For all parts of its assessment system, FLDOE must provide:</p> <ul style="list-style-type: none"> • Evidence of timely delivery of student score reports to parents; and • Evidence that reports are available in alternate formats. <p>For the R/LA and mathematics general assessments in grades 3-8 (FSA) and high school (FSA-EOC), FLDOE must provide:</p> <ul style="list-style-type: none"> • Evidence of current individual student reports that shows student achievement in terms of State grade-level achievement standards. 	<ul style="list-style-type: none"> • Understanding FSA Reports, Spring 2016 [evidence was submitted under 4.4, but used by peers for 6.4] • FL Paper Tracking Summer 2016 • Email1_Spring 2016 FSA and NGSSS Assessments Results Release • Email2_Proof of Delivery FL Summer EOC 2016 • Email3_Summer 2016 EOC Reporting Proof of Delivery 	<p>The emails cited show that score reports are available in a timely manner. Emails 1, 2, and 3 provided documentation the reports were delivered to districts to be disseminated to students. Hard copies of the reports were shipped to districts and access to electronic reports via secure website were available.</p> <p>The FL Paper Tracking Summer 2016 spreadsheet documented reports were delivered to districts.</p> <p>The individual student reports are provided in English, Spanish, and Haitian Creole.</p> <p>“Understanding FSA Reports, Spring 2016” (provided but not cited for this CE) shows ISRs on page 7 for Grades 3-8, p. 8 for EOC. Scores are reported in terms of performance levels, but the performance levels are not referenced to academic content achievement (no performance level descriptors are provided). Instead, performance levels are related to the probable performance in the next grade or course. For example, “Proficient” is defined as “likely to exceed in the next grade [course].” Satisfactory is described as “may need additional support for the next grade [course].”</p> <p><i>U. S. Department of Education Peer Review of State Assessment Systems Non-Regulatory Guidance for States</i> for critical element 6.4 says of individual student reports -- “Report the student’s achievement in terms of the State’s grade-level academic achievement standards</p>

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STATE ASSESSMENT PEER REVIEW NOTES FOR FLORIDA

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
		(including performance-level descriptors)....” (p. 52).
Section 6.4 Summary Statement		
<p>X The following additional evidence is needed/provide brief rationale: For the R/LA and mathematics general assessments in grades 3-8 (FSA) and high school (FSA-EOC), FLDOE must provide:</p> <ul style="list-style-type: none"> • Evidence of current individual student reports that shows student achievement in terms of State grade-level achievement standards. 		

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