



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Julia Keleher
Secretary of Education
Puerto Rico Department of Education
P.O. Box 190759
San Juan, PR 00919-0759

April 20, 2018

Dear Secretary Keleher:

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 (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 (R/LA), mathematics, and science that meet nationally recognized professional and technical standards with a few additional requirements. I appreciate the efforts of the Puerto Rico Department of Education (PRDE) to prepare for the peer review, which occurred in August 2017.

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 PRDE's submission and the Department found, based on the evidence received, that the components of your assessment system meet some, but not all of the statutory and regulatory requirements of 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:

- General assessments in mathematics and R/LA for grades 3-8 (META-PR): **Substantially meets requirements**
- General assessments in science in grades 4 and 8 (META-PR): **Substantially meets requirements**
- General assessments in high school (multi-subject or end of course in R/LA, mathematics, and science) (META-PR): **Substantially 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.

- Alternate assessments aligned with alternate academic achievement standards (AA-AAAS) for grades 3-8 and high school in R/LA, mathematics and science (META-PR ALTERNA):
Partially meets requirements of the ESEA, as amended by the NCLB. The META-PR ALTERNA does not meet the requirements of the ESEA, as amended by the ESSA.

Substantially meets requirements means that assessment components meet most of the requirements of the statute and regulations but some additional information is required. As noted in the enclosure to this letter, I have noted several areas in which additional information is needed in order to conclude that the META-PR general assessments meet the requirements of the ESEA, as amended by both the NCLB and the ESSA. I expect that PRDE should be able to provide this additional information within one year.

Partially meets requirements means that assessment components do not meet a number of the requirements of the statute and regulations of the ESEA, as amended by the NCLB. I have concluded, as noted in the enclosure to this letter, that the META-PR ALTERNA partially meets the requirements of the ESEA, as amended by the NCLB.

However, in its current design, the META-PR ALTERNA **does not meet** requirements of the ESEA, as amended by ESSA. Section 1111(b)(2)(B)(vi) of the ESEA, as amended by the ESSA, only authorizes an individual State assessment to be based partially upon a portfolio. As you know, the META-PR ALTERNA is based entirely upon a portfolio of student work and therefore is not permitted in its current design under the statute. PRDE will need to redesign or replace the META-PR ALTERNA such that it complies with the statute. Under the orderly transition authority in section 4(b) of the ESSA, I am granting PRDE until December 15, 2020, to submit evidence of an AA-AAAS that meets the ESSA requirements for assessment format.

I have also determined that Puerto Rico's alternate academic achievement standards must ensure that students are on track to pursue postsecondary education or employment, as specified in section 1111(b)(1)(E) of the ESEA, as amended by the ESSA. I ask that PRDE provide evidence of meeting this requirement also by December 15, 2020.

I will place a condition on PRDE's Title I grant for the 2018 fiscal year. This condition will remain in place until PRDE provides all of the remaining evidence required from the 2017 peer review. 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. In particular, OSERS will monitor progress against critical elements 1.4, 2.1, 4.3, 5.1, 5.4 and 6.3. Insufficient progress to address such matters may lead OSERS to place a condition on PRDE's federal fiscal year 2019 IDEA Part B grant award.

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.

Page 3 – The Honorable Julia Keleher

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 Megan Oberst of my staff at: OSS.PuertoRico@ed.gov.

Sincerely,

/s/

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

Enclosures

cc: Ada E. Hernández Guadalupe, Director of Assessment

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

Overall Finding: For the META-PR ALTERNA of reading/language arts (R/LA), mathematics and science, evidence that the assessment format meets the requirements of Section 1111(b)(2)(B)(vi) of the ESEA, as amended by the ESSA. This section of the statute prohibits an individual State assessment that is based entirely upon a portfolio.

Critical Element	Additional Evidence Needed
1.4 – Policies for Including All Students in Assessments	For the META-PR and META-PR ALTERNA: <ul style="list-style-type: none"> Documentation of the policy on providing annual assessments in tested grades and subjects to students with disabilities publicly placed in private schools.
2.1 – Test Design and Development	For the META-PR: <ul style="list-style-type: none"> Evidence of a process built into test development for the general assessments to ensure appropriate inclusion of challenging content and complex demonstration or application of knowledge and skills.
2.2 – Item Development	For the META-PR: <ul style="list-style-type: none"> Please see the requested additional evidence in 2.1.
2.3 – Test Administration	For the META-PR: <ul style="list-style-type: none"> Detailed information about minimum and optimal hardware, software, and bandwidth requirements for the computer-based test administration system. Contingency plans for technology issues that may arise during the online administration of the META-PR.
2.4 – Monitoring Test Administration	For the META-PR and META-PR ALTERNA: <ul style="list-style-type: none"> Evidence of implementation (e.g., monitoring calendar, monitoring report with corrective actions, evidence that corrective actions have been implemented) of statewide monitoring of test administration for both the general and alternate assessments.
2.5 – Test Security	For the META-PR: <ul style="list-style-type: none"> Evidence of specific consequences for test security violations. Evidence the required frequency of test security training. Evidence of policies and procedures to remediate test security breaches and irregularities. Evidence of policies and procedures for responding to and investigating alleged or actual security lapses and test irregularities. For the META-PR ALTERNA: <ul style="list-style-type: none"> Evidence of policies and procedures for ensuring portfolio security at the school and for detecting any portfolio assembly violations at the scoring site.
2.6 – Systems for Protecting Data Integrity and Privacy	For the META-PR: <ul style="list-style-type: none"> Evidence of documentation regarding security during test development activities. <ul style="list-style-type: none"> Evidence of documentation regarding how the schools transmit test data to the Puerto Rico Department of Education (PRDE) or how the data are stored.

Critical Element	Additional Evidence Needed
	For the META-PR ALTERNA: <ul style="list-style-type: none"> • Evidence of documentation regarding how the schools transmit test data to PRDE or how the data are stored. • Evidence that the minimum reporting size ($n < 20$) is applied to the reporting for the alternate assessment.
3.2 – Validity Based on Cognitive Processes	For the META-PR ALTERNA: <ul style="list-style-type: none"> • Evidence to document that the alternate assessment is tapping the intended cognitive processes appropriate for each grade level.
3.3 – Validity Based on Internal Structure	For the META-PR ALTERNA, PRDE must provide: <ul style="list-style-type: none"> • Evidence documenting that the scoring and reporting structures are consistent with the sub-domain structures of the academic content standards.
3.4 – Validity Based on Relationships with Other Variables	For the META-PR and META-PR ALTERNA: <ul style="list-style-type: none"> • Evidence that the State assessments are related with other measures as expected.
4.1 – Reliability	For the META-PR ALTERNA: <ul style="list-style-type: none"> • Reliability evidence that shows levels of reliability generally considered adequate by professional judgment regarding such assessments includes documentation such as: <ul style="list-style-type: none"> ○ Internal consistency coefficients that show that item scores are related to a student's overall score. ○ Correlations of item responses to student proficiency level classifications. ○ Generalizability evidence such as evidence of fidelity of administration.
4.3 – Full Performance Continuum	For the META-PR ALTERNA: <ul style="list-style-type: none"> • Evidence that the test provides adequately precise estimates of student performance across the full continuum (e.g., a cumulative frequency distribution or histogram of student scores for each grade and subject on the most recent test administration).
4.6 – Multiple Versions of an Assessment	For the META-PR: <ul style="list-style-type: none"> • Evidence of comparability of the meaning and interpretations of the assessment results; specifically— <ul style="list-style-type: none"> ○ Whether the online administration used standardized hardware/software across unaccommodated test administrations; OR ○ Demonstrate score comparability across different devices.
5.1 – Procedures for Including Students with Disabilities	For the META-PR ALTERNA: <ul style="list-style-type: none"> • Documentation that provides clear explanations of the differences between assessments based on grade-level academic achievement standards and assessments based on alternate academic achievement standards, including any effects of State and local policies on a student's education resulting from taking an alternate assessment based on alternate academic achievement standards. • Evidence that parents of students with the most significant cognitive disabilities are informed that their child's achievement will be based on alternate academic achievement standards and of possible consequences thereof.

Critical Element	Additional Evidence Needed
5.2 – Procedures for Including Spanish Learners (SLs)	<p>For the META-PR and META-PR ALTERNA:</p> <ul style="list-style-type: none"> • Evidence of procedures and guidance for determining whether a limited Spanish proficient learner should receive linguistic accommodations. • Evidence of guidance that supports local educators in selecting possible accommodations for limited Spanish proficient students.
5.3 – Accommodations	<p>For the META-PR:</p> <ul style="list-style-type: none"> • Evidence that PRDE has determined that the accommodations it provides (i) are appropriate and effective for meeting the individual student’s need(s) to participate in the assessments, (ii) do not alter the construct being assessed, and (iii) 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; this may include evidence such as— <ul style="list-style-type: none"> ○ A summary of the frequency of use of each accommodation by student characteristics; OR ○ A summary of test performance for students using each accommodation (mean scale scores, standard deviations; reliability estimates). • Evidence of a process to individually review and allow exceptional requests for the small number of students who require accommodations beyond those routinely allowed.
5.4 – Monitoring Test Administration for Special Populations	<p>For the META-PR and META-PR ALTERNA:</p> <ul style="list-style-type: none"> • Evidence to show that accommodations were monitored to ensure fidelity with allowable test administration procedures. Examples of this evidence may include: <ul style="list-style-type: none"> ○ Written procedures for monitoring the use of accommodations during test administration, such as guidance provided to districts; instructions and protocols for State, district and school staff; and schedules for monitoring; AND ○ Summary of results of monitoring for the most recent year of test administration in the State.
6.3 – Challenging and Aligned Academic Achievement Standards (additional requirement under section 1111(b)(1)(E) of the ESEA, as amended by the ESSA)	<p>For the META-PR ALTERNA:</p> <ul style="list-style-type: none"> • Evidence that the alternate academic achievement standards ensure that a student who meets these standards is on track to pursue post-secondary education or employment.
6.4 – Reporting	<p>For the META-PR and META-PR ALTERNA:</p> <ul style="list-style-type: none"> • Evidence that test reports are available in alternate formats (e.g., braille or large print) upon request. • Evidence of a process and timeline for delivering individual student reports to parents, teachers, and principals as soon as practicable after each test administration.

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

August 2017 State Assessment Peer Review Notes



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

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

STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

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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 Puerto Rico

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

SECTION 1: STATEWIDE SYSTEM OF STANDARDS AND ASSESSMENTS

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>1.1 – State Adoption of Academic Content Standards for All Students</p> <p>The State formally adopted challenging academic content standards for all students in reading/language arts, mathematics and science and applies its academic content standards to all public elementary and secondary schools and students in the State.</p>	<p>PRDE 7 is a memo from the Undersecretary of Education outlining institutional responsibilities and also noting that standards were implemented in Spanish, math, English, and science (p. 3) during 2014-2015 and are to be applied to all students. PRDE 14b also refers to the fact that the standards are to be applied to all students.</p> <p>PRDE 1 (p. 47-61) includes the actual content standards, the development of which is also explained.</p>	<p>Peers could not locate a record of formal adoption of the standards.</p>
<p>Section 1.1 Summary Statement</p>		
<p><u>x</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Record of formal adoption of academic content standards. 		

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 Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>1.2 – Coherent and Rigorous Academic Content Standards</p> <p>The State’s academic content standards in reading/language arts, mathematics and science specify what students are expected to know and be able to do by the time they graduate from high school to succeed in college and the workforce; contain content that is coherent (e.g., within and across grades) and rigorous; encourage the teaching of advanced skills; and were developed with broad stakeholder involvement.</p>	<p>General assessment:</p> <p>PRDE 24 (p. 5) describes how standards were developed to be comparable in content and rigor to other national standards including Common Core and Next Generation science standards. PRDE 1 (p. 14) indicates that the standards were informed by international frameworks such as CEFR (for Spanish).</p> <p>PRDE 1 (p. 14) and 15 document the development of the academic content standards and involvement of content experts and various stakeholders.</p> <p>Alternate assessment:</p> <p>PRDE 31 (starting on p. 18) describes a crosswalk between the core standards and the PPEA (the former name for the Alt, now called META-PR ALTERNA) for Spanish, math, and science. On p. 97 there is a table showing which content standards were assessed but there is no indication of the coverage (i.e., what percent of the standards were assessed).</p> <p>PRDE 31 documents the development process for the alternate assessment and details stakeholder involvement.</p>	<p>Sufficient evidence was provided to address this critical element.</p>
<p>Section 1.2 Summary Statement</p>		
<p><input checked="" type="checkbox"/> No additional evidence is required</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 Puerto Rico

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>1.3 – Required Assessments</p> <p>The State’s assessment system includes annual general and alternate assessments (based on grade-level academic achievement standards or alternate academic achievement standards-AAAS) in:</p> <ul style="list-style-type: none"> • Reading/language arts and mathematics in each of grades 3-8 and at least once in high school (grades 10-12); • Science at least once in each of three grade spans (3-5, 6-9 and 10-12). 	<p>PRDE 7</p> <ul style="list-style-type: none"> - General assessment: pages 2-3 - Alternate assessment: page 5 <p>PRDE 17 – page 13 (general assessment)</p> <p>PRDE 18 – pages 6-7, 18-19 (alternate assessment)</p>	<p>PR provides annual assessments in reading/language arts and mathematics in grades 3-8 and 11. PR provides annual science assessments in grades 4, 8, and 11.</p> <p>PR also provides an alternate assessment for students with significant cognitive disabilities that can’t take the general assessment.</p>
<p>Section 1.3 Summary Statement—REVIEWED BY DEPARTMENT STAFF ONLY</p>		
<p><u> </u> No additional evidence is required</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 Puerto Rico

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</p> <p>The State requires the inclusion of all public elementary and secondary school students in its assessment system and clearly and consistently communicates this requirement to districts and schools.</p> <ul style="list-style-type: none"> • For students with disabilities(SWD), policies state that all students with disabilities in the State, including students with disabilities publicly placed in private schools as a means of providing special education and related services, must be included in the assessment system; • For English learners (EL): <ul style="list-style-type: none"> ○ Policies state that all English learners must be included in the assessment system, unless the State exempts a student who has attended schools in the U.S. for less than 12 months from one administration of its reading/ language arts assessment; ○ If the State administers native language assessments, the State requires English learners to be assessed in reading/language arts in English if they have been enrolled in U.S. schools for three or more consecutive years, except if a district determines, on a case-by-case basis, that native language assessments would yield more accurate and reliable information, the district may assess a student with native language assessments for a period not to exceed two additional consecutive years. 	<p>PRDE 17 – pg. 13</p> <p>PRDE 18 – Appendix B, pages 88-89</p> <p>PRDE 20 – pg. 12</p> <p>PRDE 21 – pages 11-12</p>	<p>Reading/language arts and mathematics assessments (grades 3-8, 11) are administered annually to all students, including students with disabilities and linguistic limitations. Science is also administered (grades 4, 8, and 11) annually to all students, including those with disabilities and linguistic limitations.</p> <p>PR does not explicitly state whether it has a policy to provide annual assessments in tested grades and subjects to students with disabilities publicly placed in private 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 Puerto Rico

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 1.4 Summary Statement-REVIEWED BY DEPARTMENT STAFF ONLY		
<p><input type="checkbox"/>_x_ The following additional evidence is needed/provide brief rationale: Please state whether Puerto Rico has a policy to provide annual assessments in tested grades and subjects to students with disabilities publicly placed in private 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 Puerto Rico

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>1.5 – Participation Data</p> <p>The State’s participation data show that all students, disaggregated by student group and assessment type, are included in the State’s assessment system. In addition, if the State administers end-of-course assessments for high school students, the State has procedures in place for ensuring that each student is tested and counted in the calculation of participation rates on each required assessment and provides the corresponding data.</p>	<p>PRDE 22</p>	<p>PR provides assessment participation data broken down by subgroup, for both the general and alternate assessments, for all tested grades and subjects (reading/language arts, mathematics, and science). The assessment participation data indicates that ~94% or more of each subgroup of students in tested grades and subjects were assessed during the 2015-2016 school year.</p>
<p>Section 1.5 Summary Statement-REVIEWED BY DEPARTMENT STAFF ONLY</p>		
<p><u> x </u> No additional evidence is required</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 Puerto Rico

SECTION 2: ASSESSMENT SYSTEM OPERATIONS

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</p> <p>The State’s test design and test development process is well-suited for the content, is technically sound, aligns the assessments to the full range of the State’s academic content standards, and includes:</p> <ul style="list-style-type: none"> • Statement(s) of the purposes of the assessments and the intended interpretations and uses of results; • Test blueprints that describe the structure of each assessment in sufficient detail to support the development of assessments that are technically sound, measure the full range of the State’s grade-level academic content standards, and support the intended interpretations and uses of the results; • Processes to ensure that each assessment is tailored to the knowledge and skills included in the State’s academic content standards, reflects appropriate inclusion of challenging content, and requires complex demonstrations or applications of knowledge and skills (i.e., higher-order thinking skills); • If the State administers computer-adaptive assessments, the item pool and item selection procedures adequately support the test design. 	<p>General assessment:</p> <ul style="list-style-type: none"> • Purposes and intended interpretations and uses of the results are documented in PRDE 7, 23, and 33. • PRDE 24 and 27 describe the test blueprint and development process, including item writing. • Although PRDE did an alignment study showing DOK for an iteration of the PPAA, peers could not locate evidence of a <i>process</i> built into the test development to ensure complex demonstrations or applications of knowledge and skills (e.g., by having DOK targets for item writers). • N/A: PR does not have computer-adaptive assessments. <p>Alternate assessment:</p> <ul style="list-style-type: none"> • Purposes and intended interpretations and uses of the results are documented in PRDE 7, 31, and 32 (results interpretation guide). • PRDE 31 describes the test blueprint and development process. • PRDE 18, p. 14 describes how teachers should assemble a portfolio, including ensuring that it is at an appropriate level of cognitive complexity. • N/A: PR does not have not computer-adaptive assessments. 	<p>General assessment:</p> <p>Sufficient evidence was provided to address this critical element, except that peers could not locate evidence of a <i>process</i> built into the test development to ensure complex demonstrations or applications of knowledge and skills (e.g., by having DOK targets for item writers).</p>
<p>Section 2.1 Summary Statement</p>		
<p><u> x </u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Documentation of a process built into test development for the general assessments to ensure appropriate inclusion of challenging content and complex demonstration or application of knowledge and skills. 		

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 Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>2.2 – Item Development</p> <p>The State uses reasonable and technically sound procedures to develop and select items to assess student achievement based on the State’s academic content standards in terms of content and cognitive process, including higher-order thinking skills.</p>	<p>General assessment: PRDE 29</p> <p>Alternate assessment: PRDE 31</p>	<p>General assessment:</p> <p>Peers believe that PRDE 29 documents reasonable and technically-sound item development procedures (except as noted in 2.1 above regarding process for ensuring the assessment of higher-order thinking skills).</p> <p>Alternate assessment:</p> <p>Peers believe that PRDE 31 documents reasonable and technically-sound item development procedures.</p>
<p>Section 2.2 Summary Statement</p> <p><input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • See requested additional evidence in 2.1 summary above. 		

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 Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>2.3 – Test Administration</p> <p>The State implements policies and procedures for standardized test administration, specifically the State:</p> <ul style="list-style-type: none"> • Has established and communicates to educators clear, thorough and consistent standardized procedures for the administration of its assessments, including administration with accommodations; • Has established procedures to ensure that all individuals responsible for administering the State’s general and alternate assessments receive training on the State’s established procedures for the administration of its assessments; • If the State administers technology-based assessments, the State has defined technology and other related requirements, included technology-based test administration in its standardized procedures for test administration, and established contingency plans to address possible technology challenges during test administration. 	<p>General assessment:</p> <ul style="list-style-type: none"> • PRDE 1 and 19 (State Assessment Instructions) and PRDE 20 and 21 (accommodations for SWD and limited Spanish proficient students). PRDE also provided training materials (PRDE 37-41) from workshops regarding test administration. • PRDE has provided documentation of training for test administration (PRDE 43-45). • PRDE 43, p. 4 <p>Alternate assessment:</p> <ul style="list-style-type: none"> • PRDE 18 (Teacher’s Guide) explains in detail how teachers should assemble the portfolio. This is essentially a test 	<p>General assessment:</p> <ul style="list-style-type: none"> • PRDE 43, p. 4 indicates very minimal hardware and software requirements for online test administration. The document does not specify bandwidth/connectivity requirements of specific operating system, hardware versions, etc. Such information should be provided, with minimum requirements and recommended/optimal ones as well. <p>Peers could not locate contingency plans for issues such as loss of connectivity during online test administration. There is a phone number referenced (PRDE 42, p. 66) for test administrators to call, but no documented contingency plan for a standardized response to technology issues.</p> <p>Alternate assessment:</p> <p>Sufficient evidence was provided to address this critical element.</p>

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	<p>administration manual given the fully individualized nature of the alternate assessment.</p> <ul style="list-style-type: none"> • PRDE 39-41 documents training for teachers/test administrators. • N/A: The alternate assessment is not computer-administered. 	
Section 2.3 Summary Statement		
<p><input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • For the online administration of the general assessment, please provide more detailed information about minimum and optimal hardware, software, and bandwidth requirements. • Please provide contingency plans (i.e., what action to take based on the issue or event) beyond just a phone number for technology issues during the online administration of the general assessment. 		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

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</p> <p>The State adequately monitors the administration of its State assessments to ensure that standardized test administration procedures are implemented with fidelity across districts and schools.</p>	<p>PRDE 17 – pg. 17-19</p> <p>PRDE 37 – pg. 64-65</p> <p>PRDE 45</p>	<p>PR has a series of processes that are monitored before, during, and after the administration of an assessment. PR describes the procedures that must be followed during assessment administration (e.g., test materials must be kept in a safe place, teachers must not open assessment packets until the administration begins, etc.). PRDE visits districts to ensure that the proper procedures are carried out before, during, and after assessment administration. PRDE also outlines a process schools must use if the integrity of assessment administration is compromised.</p> <p>PR also provides monitoring protocols that are used before, during, and after assessment administration for both the general and alternate assessments.</p> <p>PR does not provide evidence of implementation (e.g., monitoring calendar, monitoring report with corrective actions, evidence that corrective actions have been implemented) for islandwide monitoring of assessment administration for both the</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 Puerto Rico

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
		general and alternate assessments.
Section 2.4 Summary Statement—REVIEWED BY DEPARTMENT STAFF ONLY		
<p><u> x </u> The following additional evidence is needed/provide brief rationale: Please provide evidence of implementation (e.g., monitoring calendar, monitoring report with corrective actions, evidence that corrective actions have been implemented) for island-wide monitoring of assessment administration for both the general and alternate assessments.</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 Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>2.5 – Test Security</p> <p>The State has implemented and documented an appropriate set of policies and procedures to prevent test irregularities and ensure the integrity of test results through:</p> <ul style="list-style-type: none"> • Prevention of any assessment irregularities, including maintaining the security of test materials, proper test preparation guidelines and administration procedures, incident-reporting procedures, consequences for confirmed violations of test security, and requirements for annual training at the district and school levels for all individuals involved in test administration; • Detection of test irregularities; • Remediation following any test security incidents involving any of the State’s assessments; • Investigation of alleged or factual test irregularities. 	<p>General assessment:</p> <ul style="list-style-type: none"> • PRDE 17 (p. 17-19) and PRDE 19 (p. 14) document test security procedures, including steps to follow in incident reporting (PRDE 19, p.14). <p>PRDE 43 includes security procedures for the online administration of the test. PRDE 46 is a summary of test security procedures with a certification that principals must sign indicating that they have trained the test administration staff.</p> <p>PRDE 17 (p. 18) indicates that site visits are performed before, during, and after the tests to ensure test security. PRDE 45 includes monitoring checklists and PRDE 29 (p. 85-86) indicates that schools were randomly audited daily during the testing period.</p> <p>PRDE 19 (p. 14) lists the steps that test administrators should follow to report irregularities or test security breaches. PRDE 17 (Appendix C) is the test security form, which lists various possible categories of incidents to be reported.</p>	<p>General assessment:</p> <p>Although PRDE 17 and 19 both mention that there are consequences to violations of test security, these are not specified (e.g., “consequences ... will include up to and including dismissal and/or loss of license”).</p> <p>Peers could not locate evidence of the frequency with which test security training is required, so we cannot assess whether PRDE meets the annual training requirement.</p> <p>Peers also looked at PRDE 19 (technical manual) to see whether Pearson conducts typical data forensics to detect test irregularities and could not locate such analyses, which could provide additional evidence.</p> <p>Peers could not locate policies and procedures the state would use to address different kinds of test security incidents.</p> <p>Peers could not locate state’s policies and procedures for responding to and investigating alleged or actual security lapses and test irregularities. See non-regulatory guidance p. 32 for a description of what such policies and procedures could include.</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 Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	<p>Alternate assessment:</p> <ul style="list-style-type: none"> PRDE 18 is a through guide for teachers on how to prepare the portfolio and what considerations to keep in mind. On p. 17, the last two bullet points indicate that teachers should not provide any false information in the portfolio or add or delete evidence after the deadline. PRDE 17, p. 18 (fourth check mark) also indicates that teachers should not copy or keep any part of the portfolio, alter responses, and should comply with materials return instructions. 	<p>What procedures are in place to ensure that these violations do not happen? PRDE 31, chapter 6 details the centralized scoring that Pearson does at its San Juan site. However, there is no information about the security of the assembled portfolio at the school level, before it reaches the scoring site. At the scoring site, is there any attempt to look for duplicated tasks across portfolios (within or across years). for instance?</p>
<p>Section 2.5 Summary Statement</p>		
<p><input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale:</p> <p>General assessment:</p> <ul style="list-style-type: none"> Specify the consequences for test security violations. Specify the frequency of test security training. Provide policies and procedures to remediate test security breaches and irregularities. Provide policies and procedures for responding to and investigating alleged or actual security lapses and test irregularities (see p. 32 of non-regulatory guidance). <p>Alternate assessment:</p> <ul style="list-style-type: none"> Provide policies and procedures for ensuring portfolio security at the school and for detecting any portfolio assembly violations at the scoring site. 		
<p> </p>		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>2.6 – Systems for Protecting Data Integrity and Privacy</p> <p>The State has policies and procedures in place to protect the integrity and confidentiality of its test materials, test-related data, and personally identifiable information, specifically:</p> <ul style="list-style-type: none"> • To protect the integrity of its test materials and related data in test development, administration, and storage and use of results; • To secure student-level assessment data and protect student privacy and confidentiality, including guidelines for districts and schools; • To protect personally identifiable information about any individual student in reporting, including defining the minimum number of students necessary to allow reporting of scores for all students and student groups. 	<p>General assessment:</p> <ul style="list-style-type: none"> • PRDE 29 (p. 64) mentions that Pearson discusses security during item writer workshops. Peers expected to find further information on test security at all stages of the development process (e.g., confidentiality forms to be filled out by panelists). <p>Pearson outlines various procedures for maintaining the security of scannable and non-scannable test documents (PRDE 29, p.86-91) and for the online tests (e.g., secure browser, being the only party to restart completed tests).</p> <p>PRDE 17 (p. 18), 19 (p. 13), 36 (p.64) indicate that personal student data is confidential and accessible by only authorized personnel.</p> <ul style="list-style-type: none"> • PRDE 47, p. 37 indicates that it will not report any subgroup smaller than 20 to protect confidentiality. <p>Alternate assessment:</p> <ul style="list-style-type: none"> • PRDE 18 provides information about how teachers assembling the portfolio should maintain the integrity of test materials. PRDE 31, chapter 6 details the process Pearson uses at its scoring facility to protect data integrity. PRDE 17, p. 18 (third check mark) mentions confidentiality of the answer sheets with demographic data. PRDE 32, p. 2, “Integridad y confidencialidad de las pruebas” discusses 	<p>Please provide additional documentation beyond the assertion in the tech manual. PRDE 17 and 19 outline test administration safeguards for security.</p> <p>Peers could not locate documentation of a) how the schools transmit test data to PRDE or b) how the data are stored.</p> <p>Peers could not locate information about how the portfolios are securely transmitted from the schools to the districts. PRDE does document how return materials are picked up from districts and sent to Pearson (PRDE 31, p. 55).</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 Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
	<p>the portfolio as a secure test material that is to be handled in accordance with PRDE security protocols and indicates that it is to be shared only with a restricted set of individuals.</p> <ul style="list-style-type: none"> PRDE's submission did not reference documentation specific to the alternate. 	<p>Peers believe that this document, PRDE 47, p. 37 which indicates that it will not report any subgroup smaller than 20 to protect confidentiality, also applies to the alternate. Please confirm.</p>
<p>Section 2.6 Summary Statement</p> <p><u>x</u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> Please provide additional documentation regarding security during test development beyond the assertion in PRDE 29. Peers could not locate documentation of a) how the schools transmit test data to PRDE or b) how the data are stored. Please confirm that <i>n</i> sizes of less than 20 are not reported for the alternate assessment. 		

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 Puerto Rico

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</p> <p>The State has documented adequate overall validity evidence for its assessments, and the State’s validity evidence includes evidence that the State’s assessments measure the knowledge and skills specified in the State’s academic content standards, including:</p> <ul style="list-style-type: none"> • Documentation of adequate alignment between the State’s assessments and the academic content standards the assessments are designed to measure in terms of content (i.e., knowledge and process), the full range of the State’s academic content standards, balance of content, and cognitive complexity; • If the State administers alternate assessments based on alternate academic achievement standards, the assessments show adequate linkage to the State’s academic content standards in terms of content match (i.e., no unrelated content) and the breadth of content and cognitive complexity determined in test design to be appropriate for students with the most significant cognitive disabilities. 	<ul style="list-style-type: none"> • PRDE 13 is the report of a Webb alignment study conducted in October 2016 for math, science, and Spanish. • PRDE 33 is a report of a crosswalk between the 2014 PRCS standards and the 2007 PPEA (former name of the alt) standards. It provides evidence that in cases where no alignment was present, replacement indicators were written. 	<p>Overall results indicated adequate alignment between standards and the assessment but there are some areas that peers believe need attention (e.g., Spanish grade 11 has 50% domain representation, math grade 6 did not have 80% or more of items aligned with expectations, p. 53). What is PRDE’s plan to address this in future development cycles?</p>
<p>Section 3.1 Summary Statement</p> <p><input checked="" type="checkbox"/> No additional evidence is required</p>		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

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</p> <p>The State has documented adequate validity evidence that its assessments tap the intended cognitive processes appropriate for each grade level as represented in the State’s academic content standards.</p>	<p>General assessment: Validity study reported in PRDE 13 shows on p. 53 that 50% or more of all items across all grades and content areas are at the expected DOK level or higher.</p> <p>Alternate assessment: PRDE 31, section 8.1.5 states that intended cognitive processes appropriate for each grade level are tapped.</p>	<p>Alternate assessment: There is also some evidence in section 8.1.2.1 under ‘Development of Aligned Test Specifications’ but further detail about this process is needed to address its connection to this critical element.</p>
<p>Section 3.2 Summary Statement</p>		
<p><input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Please provide further detail to document that the alternate is tapping intended cognitive processes appropriate for each grade level. 		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>3.3 – Validity Based on Internal Structure</p> <p>The State has documented adequate validity evidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State’s academic content standards on which the intended interpretations and uses of results are based.</p>	<p>General assessment:</p> <p>PRDE 29 (p.123-125) and PRDE 29y, p. 374-391 report correlations among subtests and between subtests and total test scores. This evidence also shows DIF analyses showing that scores did not differ by gender.</p> <p>Alternate assessment:</p> <p>Peers could not locate evidence documenting that the scoring and reporting structures are consistent with the sub-domain structures of the alternate academic content standards.</p>	<p>Alternate assessment:</p> <p>Please provide such evidence.</p>
<p>Section 3.3 Summary Statement</p>		
<p><u> x </u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> Please provide evidence documenting that the scoring and reporting structures are consistent with the sub-domain structures of the alternate academic content standards. 		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

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</p> <p>The State has documented adequate validity evidence that the State’s assessment scores are related as expected with other variables.</p>	<p>General assessment:</p> <p>PRDE provided evidence 29 (Table 6.8, p. 126), which shows correlations across the general assessments.</p> <p>Alternate assessment:</p> <p>Same as for general assessment.</p>	<p>To address this critical element, it is necessary to show correlations between the assessments and other tests (e.g., NAEP, district-administered assessments of the same content areas, student grades, teacher judgments of readiness).</p>
<p>Section 3.4 Summary Statement</p>		
<p><input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> Please provide correlations between state assessments (general and alternate) and other measures. 		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

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</p> <p>The State has documented adequate reliability evidence for its assessments for the following measures of reliability for the State’s student population overall and each student group and, if the State’s assessments are implemented in multiple States, for the assessment overall and each student group, including:</p> <ul style="list-style-type: none"> • Test reliability of the State’s assessments estimated for its student population; • Overall and conditional standard error of measurement of the State’s assessments; • Consistency and accuracy of estimates in categorical classification decisions for the cut scores and achievement levels based on the assessment results; • For computer-adaptive tests, evidence that the assessments produce test forms with adequately precise estimates of a student’s achievement. 	<p>General assessment:</p> <ul style="list-style-type: none"> • PRDE 29 (p. 31-38) and for subgroups: PRDE 29y • Overall SEM and CSEM (PRDE 29, p.108-111) • PRDE 29 (p. 106-111), PRDE 29.y (section Y5) includes accuracy and consistency of classification tables for all grades, levels, and content areas • N/A: No computer-adaptive tests <p>Alternate assessment: PRDE’s submission index did not list evidence for the alternate assessment related to this critical element. However, peers located the relevant documentation indicated below:</p> <ul style="list-style-type: none"> • PRDE 31 (p. 67-68) mentions that there are several conceptualizations of reliability in such an assessment. “One is the consistency of the observed outcomes associated with a given skill”. • PRDE 31 (p. 51, section 4.3. ‘Ensuring comparability/procedural quality and fidelity’) references the portfolio assembly process but does not provide any independent verification (e.g., second observer). • No evidence located. <ul style="list-style-type: none"> • N/A: No computer-adaptive assessments 	<p>General assessment: Sufficient evidence was provided to address this critical element for the general assessment.</p> <p>Alternate assessment: Peers recommend the PRDE provide some measure of generalizability.</p> <p>Please provide generalizability evidence for fidelity of administration.</p> <p>Please provide evidence of consistency and accuracy of estimates in classification decisions for the cut scores and achievement levels.</p>
<p>Section 4.1 Summary Statement</p> <p><u> x </u> The following additional evidence is needed/provide brief rationale:</p>		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
Alternate assessment: <ul style="list-style-type: none"> • Peers recommend the PRDE provide some measure of generalizability. • Please provide generalizability evidence for fidelity of administration. • Please provide evidence of consistency and accuracy of estimates in classification decisions for the cut scores and achievement levels. 		

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 Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>4.2 – Fairness and Accessibility</p> <p>The State has taken reasonable and appropriate steps to ensure that its assessments are accessible to all students and fair across student groups in the design, development and analysis of its assessments.</p>	<p>General assessment: Evidence cited 2.1 (test design and development) and 2.2 (item development) (PRDE 29, chapter 4) document the care taken in the test development process to maximize accessibility.</p> <p>PRDE 29 (p.138-159) also details the DIF analyses showing the comparability of the online and paper versions of the assessment and to ensure no differences across subgroups (p. 184-187).</p> <p>PRDE 20 and 21 list accommodations for both SWD and students with limited Spanish proficiency.</p> <p>Alternate assessment: PRDE did not cite evidence in its submission for this critical element. However, peers located the following evidence:</p> <p>The alternate allows the students with the most significant impairments, even those who cannot be appropriately assessed with the regular assessment with accommodations, to participate fully in assessment. PRDE 18 documents the process to decide whether a student is eligible and to determine the necessary supports. PRDE 31 documents the test development process, including broad stakeholder involvement.</p>	<p>Sufficient evidence was provided to address this critical element for both the general and alternate assessment.</p>
<p>Section 4.2 Summary Statement</p>		
<p><input checked="" type="checkbox"/> No additional evidence is required</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 Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>4.3 – Full Performance Continuum</p> <p>The State has ensured that each assessment provides an adequately precise estimate of student performance across the full performance continuum, including for high- and low-achieving students.</p>	<p>General assessment:</p> <p>PRDE 29.y lists TIFs and CSEMs (p. 114-138) showing score precision across the range of performance.</p> <p>Alternate assessment:</p> <p>PRDE did not cite evidence in its submission for this critical element. Peers could not locate any evidence for this critical element listed in the non-regulatory guidance (p. 41).</p>	<p>General assessment:</p> <p>Sufficient evidence is provided to address this critical element.</p> <p>Alternate assessment:</p> <p>Please provide documentation that the alternate provides adequately precise estimates of student performance across the full continuum (e.g., a cumulative frequency distribution or histogram of student scores for each grade and subject on the most recent test administration).</p>
<p>Section 4.3 Summary Statement</p>		
<p><input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Please provide documentation that the alternate provides adequately precise estimates of student performance across the full continuum. 		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>4.4 – Scoring</p> <p>The State has established and documented standardized scoring procedures and protocols for its assessments that are designed to produce reliable results, facilitate valid score interpretations, and report assessment results in terms of the State’s academic achievement standards.</p>	<p>General assessment: PRDE 29 (chapter VI) details scoring procedures and protocols.</p> <p>PRDE 48: Constructed Response Scoring Plan</p> <p>Alternate assessment: PRDE 31 (chapter VI) details scoring procedures and protocols for the portfolio assessment.</p>	<p>Sufficient evidence is provided to address this critical element.</p>
<p>Section 4.4 Summary Statement</p>		
<p><input checked="" type="checkbox"/> No additional evidence is required</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 Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>4.5 – Multiple Assessment Forms</p> <p>If the State administers multiple forms within a content area and grade level, within or across school years, the State ensures that all forms adequately represent the State’s academic content standards and yield consistent score interpretations such that the forms are comparable within and across school years.</p>	<p>General assessment: PRDE 29 (p. 126-130 and 130-134) describes the scaling and equating across forms.</p> <p>Alternate assessment: N/A: portfolio assessment</p>	<p>Sufficient evidence is provided to address this critical element.</p>
<p>Section 4.5 Summary Statement</p>		
<p><input checked="" type="checkbox"/> No additional evidence is required</p>		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

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</p> <p>If the State administers assessments in multiple versions within a content area, grade level, or school year, the State:</p> <ul style="list-style-type: none"> Followed a design and development process to support comparable interpretations of results for students tested across the versions of the assessments; Documented adequate evidence of comparability of the meaning and interpretations of the assessment results. 	<p>General assessment:</p> <p>Spanish and Science assessments have online and paper versions. PRDE 29 (p. 134-183) documents a comparability study of the two versions and PRDE 49 details the calibration study Pearson performed, which includes DIF analyses on the two versions (p. 8-29).</p> <p>Alternate assessment:</p> <p>N/A</p>	<p>General assessment:</p> <p>Peers noted that in PRDE 43 (p. 4) indicates that the online assessments are available on a number of devices (Windows and Mac laptops and desktops, Chromebooks, iPads, and Android devices). Per non-regulatory guidance (p. 43) PRDE should provide documentation either that the test administration hardware and software are standardized across unaccommodated administrations or demonstrate that delivery mode does not affect score comparability.</p> <p>Peers noticed that Braille forms can be special ordered from the vendor as an approved accommodation (PRDE 29, p. 93). We did not locate analyses of the comparability of Braille tests to standard forms, but this is probably because there appear to have been only 5 Braille forms administered in 2015-2016 (PRDE 52), making such an analysis impossible.</p> <p>Alternate assessment:</p> <p>N/A</p>
<p>Section 4.6 Summary Statement</p>		
<p><input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> Please indicate whether the online administration used standardized hardware/software across unaccommodated administrations or demonstrate score comparability across devices. 		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>4.7 – Technical Analysis and Ongoing Maintenance</p> <p>The State has a system for monitoring and maintaining, and improving as needed, the quality of its assessment system, including clear and technically sound criteria for the analyses of all of the assessments in its assessment system (i.e., general assessments and alternate assessments).</p>	<p>General assessment: PRDE 29 (chapter III) PRDE 13 PRDE 50 (TAC minutes)</p> <p>Alternate assessment: PRDE did not cite evidence related to the alternate in their submission index but peers located the following: PRDE 31 (chapters 3, 4, and 5) PRDE 50 (TAC minutes)</p>	<p>Sufficient evidence is provided to address this critical element for both the general and alternate assessment.</p>
<p>Section 4.7 Summary Statement</p>		
<p><input checked="" type="checkbox"/> No additional evidence is required</p>		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

SECTION 5: INCLUSION OF ALL STUDENTS

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>5.1 – Procedures for Including Students with Disabilities</p> <p>The State has in place procedures to ensure the inclusion of all public elementary and secondary school students with disabilities in the State’s assessment system, including, at a minimum, guidance for individual educational plan (IEP) Teams to inform decisions about student assessments that:</p> <ul style="list-style-type: none"> • Provides clear explanations of the differences between assessments based on grade-level academic achievement standards and assessments based on alternate academic achievement standards, including any effects of State and local policies on a student’s education resulting from taking an alternate assessment based on alternate academic achievement standards; • States that decisions about how to assess students with disabilities must be made by a student’s IEP Team based on each student’s individual needs; • Provides guidelines for determining whether to assess a student on the general assessment without accommodation(s), the general assessment with accommodation(s), or an alternate assessment; • Provides information on accessibility tools and features available to students in general and assessment accommodations available for students with disabilities; • Provides guidance regarding selection of appropriate accommodations for students with 	<ul style="list-style-type: none"> • Peers could not find documentation of the effects of State and local policies on a student’s education resulting from taking the alternate assessment. • PRDE 18 (p.93), PRDE 56 (p. 8), and PRDE 20 (accommodations manual) • PRDE 19, 20, 21 provide information on accommodations for SWD and limited Spanish proficient students; PRDE 51 (‘Public policy for drafting an IEP in MIPE [Mi portal especial, platform for recording IEP] 2016-2017 for special education students’ [title translated by peers]) provides guidance for IEP teams • PRDE 20; PRDE 21 (p. 11) lists appropriate accommodations for limited Spanish proficient students on statewide assessments. • PRDE 20 (p. 21-40) lists the various categories of accommodations and their appropriateness for students with different kinds of disabilities. • PRDE 18 (p. 6) • Peers could not locate evidence that parents of students with the most significant cognitive disabilities are informed that their child’s achievement will be based on alternate academic achievement standards and of possible consequences thereof. • PRDE 18 (p. 7), which is the teacher guide for the alternate (designed for the most significantly cognitively impaired students) specifies that the general academic achievement standards are the basis of the curriculum for all students, including those with special needs. 	<ul style="list-style-type: none"> • Please provide such documentation. • Please provide such documentation.

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>disabilities;</p> <ul style="list-style-type: none"> • Includes instructions that students eligible to be assessed based on alternate academic achievement standards may be from any of the disability categories listed in the IDEA; • Ensures that parents of students with the most significant cognitive disabilities are informed that their student’s achievement will be based on alternate academic achievement standards and of any possible consequences of taking the alternate assessments resulting from district or State policy (e.g., ineligibility for a regular high school diploma if the student does not demonstrate proficiency in the content area on the State’s general assessments); • The State has procedures in place to ensure that its implementation of alternate academic achievement standards for students with the most significant cognitive disabilities promotes student access to the general curriculum. 		
Section 5.1 Summary Statement		
<p><input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Peers could not find documentation of the effects of State and local policies on a student’s education resulting from taking the alternate assessment. Please provide. • Peers could not locate evidence that parents of students with the most significant cognitive disabilities are informed that their child’s achievement will be based on alternate academic achievement standards and of possible consequences thereof. Please provide. 		

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 Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>5.2 – Procedures for including ELs</p> <p>The State has in place procedures to ensure the inclusion of all English learners in public elementary and secondary schools in the State’s assessment system and clearly communicates this information to districts, schools, teachers, and parents, including, at a minimum:</p> <ul style="list-style-type: none"> • Procedures for determining whether an English learner should be assessed with accommodation(s); • Information on accessibility tools and features available to all students and assessment accommodations available for English learners; • Guidance regarding selection of appropriate accommodations for English learners. 	<ul style="list-style-type: none"> • PRDE 21 lists accommodations for limited Spanish proficient learners but does not indicate procedures for determining whether an LSP learner should receive linguistic accommodations. • PRDE 21, PRDE 29 (p. 93) • PRDE 21 (p. 11) lists appropriate accommodations for limited Spanish proficient students on statewide assessments but does not provide guidance about how test administrators should select from among the possibilities. 	<p>For instance, peers wondered at what point or how it is decided that a second language learner of Spanish no longer needs accommodations?</p> <p>Additional guidance should be included.</p>
<p>Section 5.2 Summary Statement</p>		
<p><input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Please specify procedures for determining whether a limited Spanish proficient learner should receive linguistic accommodations. • Please provide additional guidance about how test administrators should select from among possible accommodations for limited Spanish proficient students. 		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>5.3 – Accommodations</p> <p>The State makes available appropriate accommodations and ensures that its assessments are accessible to students with disabilities and English learners. Specifically, the State:</p> <ul style="list-style-type: none"> • Ensures that appropriate accommodations are available for students with disabilities(SWD) under the Individuals with Disabilities Education Act (IDEA) and students covered by Section 504; • Ensures that appropriate accommodations are available for English learners (EL); • Has determined that the accommodations it provides (i) are appropriate and effective for meeting the individual student’s need(s) to participate in the assessments, (ii) do not alter the construct being assessed, and (iii) allow meaningful interpretations of results and comparison of scores for students who need and receive accommodations and students who do not need and do not receive accommodations; • Has a process to individually review and allow exceptional requests for a small number of students who require accommodations beyond those routinely allowed. 	<ul style="list-style-type: none"> • PRDE 20 and 21 • PRDE 21 • PRDE 29 (p. 213) references an Appendix ‘Review of implementations of accommodations for students with disabilities and LSP students for the PPAA’ which could provide evidence, but peers were unable to locate it; PRDE 52 provides a frequency count of the number of regular test booklets, large print, Braille, students who receive a reader, and a DVD test presentation). • Peers could not locate documentation of a process to individually review and allow exceptional requests for the small number of students who require accommodations beyond those routinely allowed. 	<ul style="list-style-type: none"> • Peers request a summary of the frequency of use of <i>each accommodation</i> by student characteristics. • Please provide.
<p>Section 5.3 Summary Statement</p>		
<p><u> x </u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Please provide a summary of the frequency of use of <i>each accommodation</i> by student characteristics. • Please provide documentation of a process to individually review and allow exceptional requests for the small number of students who require accommodations beyond those routinely allowed. 		

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 Puerto Rico

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</p> <p>The State monitors test administration in its districts and schools to ensure that appropriate assessments, with or without appropriate accommodations, are selected for students with disabilities under IDEA, students covered by Section 504, and English learners so that they are appropriately included in assessments and receive accommodations that are:</p> <ul style="list-style-type: none"> • Consistent with the State’s policies for accommodations; • Appropriate for addressing a student’s disability or language needs for each assessment administered; • Consistent with accommodations provided to the students during instruction and/or practice; • Consistent with the assessment accommodations identified by a student’s IEP Team or 504 team for students with disabilities, or another process for an English learner; • Administered with fidelity to test administration procedures. 	<p>General and alternate assessments:</p> <ul style="list-style-type: none"> • PRDE 45 provides monitoring checklists, which include ensuring that SWD receive accommodations as required by their IEP and LSPs receive linguistic accommodations • The State monitors that SWDs receive test accommodations consistent with their IEP as determined by the IEP team (COMPU by its abbreviation in the Spanish documentation) and LSPs receive linguistic accommodations from the list (PRDE 45). • See bullet above. IEP teams ensure that accommodations for assessment are consistent with those for instruction (PRDE 51). • PRDE monitoring checklist (PRDE 45) documents consistency for SWDs. For limited Spanish proficient students, the process for determining appropriate accommodations could not be located (see request in critical element 5.2 above. • Monitoring checklists (PRDE 45) ask whether accommodations were provided to SWD and LSP but not whether they were provided in accordance with correct test administration procedures. For instance, it is possible that a read-aloud accommodation was provided and contents that should not have been read aloud were read to the student (e.g., not just instructions but also reading passages). 	<ul style="list-style-type: none"> • See request in critical element 5.2. • Please provide.
<p>Section 5.4 Summary Statement</p> <p><u> x </u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Please provide evidence to show that accommodations were administered with fidelity to test administration procedures. 		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

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>6.1 – State Adoption of Academic Achievement Standards for All Students</p> <p>The State formally adopted challenging academic achievement standards in reading/language arts, mathematics and in science for all students, specifically:</p> <ul style="list-style-type: none"> • The State formally adopted academic achievement standards in the required tested grades and, at its option, also alternate academic achievement standards for students with the most significant cognitive disabilities; • 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, with the exception of students with the most significant cognitive disabilities to whom alternate academic achievement standards may apply; • The State’s academic achievement standards and, as applicable, alternate academic achievement standards, include: (a) At least three levels of achievement, with two for high achievement and a third of lower achievement; (b) descriptions of the competencies associated with each achievement level; and (c) achievement scores that differentiate among the achievement levels. 	<ul style="list-style-type: none"> • Peers understand that the certification of final PLDs by the PRDE program directors and the assessment director constitutes evidence that PR formally adopted academic achievement standards (PRDE 59) for the general and alternate assessment. • PLDs for the required tested grades and content areas can be found in PRDE 16 for the general assessment and in PRDE 57 for the alternate. • a) and b) PLDs in PRDE 16 and 57 have four levels, which include the descriptions of the competencies associated with each level. c) Achievement scores differentiating among the levels can be found in the standard setting reports (PRDE 29.N for the general and 56 for the alternate). 	
<p>Section 6.1 Summary Statement</p>		
<p><input checked="" type="checkbox"/> No additional evidence is required</p>		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>6.2 – Achievement Standards-Setting</p> <p>The State used a technically sound method and process that involved panelists with appropriate experience and expertise for setting its academic achievement standards and alternate academic achievement standards to ensure they are valid and reliable.</p>	<p>General assessment:</p> <p>PRDE 29, 29.N, and 56 document the standard setting procedures for the general assessments.</p> <p>Alternate assessment:</p> <p>PRDE 56 documents the standard setting procedures for the alternate assessment. PRDE 55 (a report from a member of the PRDE TAC) provides observational evidence for the cutscores.</p>	<p>General assessment:</p> <p>Sufficient evidence was provided to address this critical element. The modified Angoff method is well-established and the backgrounds of the panelists included a wide range of teachers (content area specialists at the needed grade levels, from various places on the island, rural/urban, SWD/regular classroom teachers, etc.)</p> <p>Alternate assessment:</p> <p>Sufficient evidence was provided to address this critical element. A variety of special ed, resource, and regular classroom teachers at the tested content and grade levels served as panelists, with varied demographic backgrounds.</p>
<p>Section 6.2 Summary Statement</p>		
<p><u> x </u> No additional evidence is required</p>		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>6.3 – Challenging and Aligned Academic Achievement Standards</p> <p>The State’s academic achievement standards are challenging and aligned with the State’s academic content standards such that a high school student who scores at the proficient or above level has mastered what students are expected to know and be able to do by the time they graduate from high school in order to succeed in college and the workforce.</p> <p>If the State has defined alternate academic achievement standards for students with the most significant cognitive disabilities, the alternate academic achievement standards are linked to the State’s grade-level academic content standards or extended academic content standards, show linkage to different content across grades, and reflect professional judgment of the highest achievement standards possible for students with the most significant cognitive disabilities.</p>	<p>General assessment: PRDE 1 (p. 6-7) indicates that principles of college and career readiness were used in developing the content standards, and the state’s grade-level content standards were the basis for developing the PLDs.</p> <p>Alternate assessment: PRDE 59 (p. 12) states, “...met to review and validate the performance level descriptors for students participating n the META-PR and META-PR-ALTERNA based on the 2014 Puerto Rico Content Standards (PRCS).” However, peers could not locate “a description of the process used to develop the alternate academic achievement standards that shows...that the state’s extended academic content standards were used as a main reference in writing performance level descriptors for the alternate academic achievement standards.” (non-regulatory guidance, p. 51)</p>	<p>General assessment: Per non-regulatory guidance (p. 50-51), peers consider this evidence that PRDE has met the requirements of this critical element.</p> <p>Alternate assessment: Please provide additional evidence to this effect.</p>
<p>Section 6.3 Summary Statement</p>		
<p><input checked="" type="checkbox"/> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> • Please provide evidence that the alternate academic achievement standards are linked to the extended academic content standards. 		

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>6.4 – Reporting</p> <p>The State reports its assessment results, and the reporting facilitates timely, appropriate, credible, and defensible interpretations and uses of results for students tested by parents, educators, State officials, policymakers and other stakeholders, and the public, including:</p> <ul style="list-style-type: none"> • The State reports to the public its assessment results on student achievement at each proficiency level and the percentage of students not tested for all students and each student group after each test administration; • The State reports assessment results, including itemized score analyses, to districts and schools so that parents, teachers, principals, and administrators can interpret the results and address the specific academic needs of students, and the State also provides interpretive guides to support appropriate uses of the assessment results; • The State provides for the production and delivery of individual student interpretive, descriptive, and diagnostic reports after each administration of its assessments that: <ul style="list-style-type: none"> ○ Provide valid and reliable information regarding a student’s achievement; ○ Report the student’s achievement in terms of the State’s grade-level academic achievement standards (including performance-level descriptors); ○ Provide information to help parents, 	<p>General and alternate assessments:</p> <ul style="list-style-type: none"> • PRDE 60 (general assessment) and PRDE 61 (alternate assessments) list student achievement at each proficiency level and the percentage of students not tested. Score reports with those features are publicly available on the PRDE website (http://www.de.gobierno.pr/files/2016_META_PR_DEPR_Exec_Summary_final.pdf) Itemized score reports appear in PRDE 60; PRDE 23 (interpretive guide) and PRDE 62 (results interpretation brochure) are intended to inform instruction • PRDE 60 (p. 78) provides an example of student-level reports that provide valid and reliable information regarding student achievement, report achievement in terms of academic achievement standards, and provide interpretive information to parents. Peers could not locate evidence that such reports are available in alternate formats (e.g., Braille or large print) upon request. • Peers could not locate evidence of a process and timeline for delivering individual student reports to parents, teachers, and principals as soon as practicable after each test administration. 	<ul style="list-style-type: none"> • Sufficient evidence was provided. • Please provide. • Please provide.

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STATE ASSESSMENT PEER REVIEW NOTES FOR Puerto Rico

Critical Element	Evidence (Record document and page # for future reference)	Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence
<p>teachers, and principals interpret the test results and address the specific academic needs of students;</p> <ul style="list-style-type: none"> ○ Are available in alternate formats (e.g., Braille or large print) upon request and, to the extent practicable, in a native language that parents can understand; ● The State follows a process and timeline for delivering individual student reports to parents, teachers, and principals as soon as practicable after each test administration. 		
<p>Section 6.4 Summary Statement</p> <p><u> x </u> The following additional evidence is needed/provide brief rationale:</p> <ul style="list-style-type: none"> ● Please provide evidence that such reports are available in alternate formats (e.g., Braille or large print) upon request. ● Please provide evidence of a process and timeline for delivering individual student reports to parents, teachers, and principals as soon as practicable after each test administration. 		

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