The Honorable Heather Bouchey
Acting Secretary of Education
Vermont Agency of Education
219 North Main Street, Suite 402
Barre, VT 05641

Dear Acting Secretary Bouchey:

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, mathematics and science that meet nationally recognized professional and technical standards with a few additional requirements. I appreciate the efforts of the Vermont Agency of Education (VAE) to prepare for the peer review, which occurred in February 2018 and which was a follow up to a 2016 review.

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.

In regards to the assessments that VAE submitted for the February 2018 peer review, peer reviewers and the Department found, based on the evidence received, that the components of VAE’s assessment system meet most, but not all of the statutory and regulatory requirements of section 1111(b)(1) and (3) of the ESEA, as amended by NCLB. Based on the recommendations from this peer review and our own analysis of the State’s submission, I have determined the following:

- General assessments in mathematics and reading/language arts (R/LA) for grades 3-8 (Smarter Balanced): **Substantially meets requirements of the ESEA, as amended by NCLB and ESSA**
- General assessments in mathematics and R/LA in high school (Smarter Balanced): **Substantially meets requirements of the ESEA, as amended by NCLB and ESSA**
I also remind you that because VAE will be adopting new alternate assessments aligned with alternate academic achievement standards, VAE will need to submit those assessments for full peer review at a future date.

Assessments that **substantially meet the requirements of the ESEA, as amended by NCLB and ESSA** meet most of the requirements of the statute and regulations but some additional information is required. The Department expects that VAE may be able to provide this additional information within one year. The specific list of items required for VAE to submit is enclosed with this letter. VAE must provide to the Department a plan and timeline by which it will submit the additional documentation within 30 days of the receipt of this letter. If adequate progress is not made, the Department may take additional action.

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

In addition, the full peer review notes from the review are enclosed. These recommendations to the Department formed the basis of our determination. Please note that the peers’ recommendations may differ from the Department’s feedback; we encourage you to read the full peer notes for additional suggestions and recommendations for improving your assessment system beyond what is noted in the Department’s feedback. Department staff will reach out to your assessment director in the next few days to discuss the peer notes and the Department’s determination and to answer any questions you have.
Thank you for your ongoing commitment to improving educational outcomes for all students. I look forward to our continued partnership as we move ahead with this critical work. I appreciate the work you are doing to improve your schools and provide a high-quality education for your students.

If you have any questions, please contact Jameel Scott of my staff at: OSS.Vermont@ed.gov.

Sincerely,

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

Enclosures

cc: Michael Hock, Director of Educational Assessment
**Critical Elements Where Additional Evidence is Needed to Meet the Requirements for Vermont’s Assessment System**

<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Additional Evidence Needed</th>
</tr>
</thead>
</table>
| **2.3 – Test Administration**            | For all components of Vermont Agency of Education’s (VAE) assessment system:  
  - Description of the guidance provided to districts and schools in regard to contingency plans for catastrophic events. |
| **2.4 – Monitoring Test Administration** | For the reading/language arts (R/LA) and mathematics general assessments in grades 3-8 and high school (Smarter Balanced):  
  - Evidence that the State has a quality assurance plan to ensure the local educational agency administrators are adequately monitoring standardized test administration procedures on behalf of the State. |
| **4.4 – Scoring**                        | For R/LA and mathematics general assessments in grades 3-8 and high school (Smarter Balanced):  
  - Evidence that the State has monitored the quality and reliability of performance task scoring conducted during its test administration for the Smarter Balanced tests. |
| **5.1 – Procedures for Including Students with Disabilities** | For R/LA and mathematics general assessments in grades 3-8 and high school (Smarter Balanced):  
  - Evidence regarding how Vermont informs parents of students with significant cognitive disabilities that the alternate assessments of alternate academic achievement standards (AA-AAAS) is based on alternate academic achievement standards and about possible consequences of participation in AA-AAAS.  
  - Evidence that describes Vermont’s procedures for ensuring that its implementation of alternate academic achievement standards for students with the most significant cognitive disabilities promotes students’ access to the general curriculum. |
| **5.2 – Procedures for Including ELs**   | For R/LA and mathematics general assessments in grades 3-8 and high school (Smarter Balanced):  
  - Evidence of guidance regarding selection of the Spanish version of the Smarter Balanced assessments for English learners, and evidence of procedures for communication of this guidance to districts, schools, teachers and parents. |
| **6.4 – Reporting**                      | For R/LA and mathematics general assessments in grades 3-8 and high school (Smarter Balanced):  
  - Evidence of the availability of score reports in alternate formats. |
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.
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 VERMONT (resubmission)

SECTION 1: STATEWIDE SYSTEM OF STANDARDS AND ASSESSMENTS

<table>
<thead>
<tr>
<th>Critical Element—REVIEWED BY DEPARTMENT STAFF ONLY</th>
<th>Evidence —REVIEWED BY DEPARTMENT STAFF ONLY (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence — REVIEWED BY DEPARTMENT STAFF ONLY</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.4 – Policies for Including All Students in Assessments (from 2016 review)</td>
<td>• Agency Statement on Assessment Participation, Exemptions and Parental Opt-Out Requests</td>
<td>Vermont Agency of Education (VAE) provided the agency’s statement that under both Federal law and Vermont policy, all students, including students with disabilities and English Language Learners, must participate in state accountability assessments. This requirement can be met using one or more of the following options: • General State Assessment • General State Assessment with Accommodations • Alternate Assessment of Alternate Achievement Standards This rule applies to public school students as well as publicly funded students who attend private independent schools.</td>
</tr>
</tbody>
</table>

Section 1.4 Summary Statement—REVIEWED BY DEPARTMENT STAFF ONLY

☑ No additional evidence is required

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.
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.

<table>
<thead>
<tr>
<th>Critical Element—REVIEWED BY DEPARTMENT STAFF ONLY</th>
<th>Evidence —REVIEWED BY DEPARTMENT STAFF ONLY (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence — REVIEWED BY DEPARTMENT STAFF ONLY</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.5 – Participation Data (from 2016 review)</td>
<td>• Vermont EdFacts File – Screen Shot - Please Note: Each Entry that is coded “ALTPARTALTACH” represents a student who completed the alternate assessment.</td>
<td>VAE submitted a one page document labeled Vermont EdFacts File with highlighting text showing all “atpartaltach” which represents students who completed the alternate assessment.</td>
</tr>
</tbody>
</table>

Section 1.5 Summary Statement—REVIEWED BY DEPARTMENT STAFF ONLY

X No additional evidence is required
### Section 2: Assessment System Operations

<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
</table>
| **2.3 – Test Administration (from 2016 review)** | - 2.3.1 AIR’s Response to Question 1  
- 2.3.2 Request for Proposals | It is unclear what the state provides for guidance to schools in regard to contingency plans for catastrophic events. |
| For all components of its assessment system, VAE must provide:  
- Evidence of contingency plans to address potential technology issues during test administration | | Evidence is needed in regard to the procedures for training all individuals responsible for administering the alternate assessments. |
| For R/LA and mathematics alternate assessments of alternate academic achievement standards (AA- AAAS) in grades 3-8 and HS (DLM-Int), VAE must provide:  
- Evidence of procedures for training all individuals responsible for administering DLM assessments. | | |

**Section 2.3 Summary Statement**

- The following additional evidence is needed/provide brief rationale:
  - Evidence is needed to describe guidance provided to districts and schools in regard to contingency plans for catastrophic events.
  - Evidence is needed regarding procedures for training all individuals responsible for administering the alternate assessments.

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.
Consistent with the note on page 1, the evidence requested by the peer reviewers does not necessarily reflect the final set of additional evidence, if any, that a State may need to submit to demonstrate that its assessment system meets all of the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.
## 2.4 – Monitoring Test Administration (from 2016 review)

For R/LA and mathematics general assessments in grades 3-8 and HS (Smarter Balanced), VAE must provide:

- Evidence that the State uses the vendor-provided data forensic reports to monitor test administration; OR
- Evidence that the State has a quality assurance plan to ensure the LEA administrators are adequately monitoring standardized test administration procedures on behalf of the State.

<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Evidence</th>
<th>Comments/Notes/Questions/Suggestions</th>
</tr>
</thead>
</table>
| 2.4 Monitoring Test Administration | • District Test Administrator’s Certification of Proper Test Administration | VAE provided an explanation of the role of the District Test Administrator and a copy of a proposed District Administrator’s Certification of Proper Test Administration checklist. This checklist will require administrators to certify that the assessments were administered in accordance with the principles and procedures outlined in the Test Coordinators and Test Administrators Manuals. The checklist requires a signature demonstration and acknowledging that adequate monitoring standardized test administration procedures are in place. This includes but not limited to the following:
  • that all test administrators and other school staff who have access to test materials have been fully trained in test security measures and procedures;
  • test security has been maintained throughout the testing window, including keeping all tests under lock and key when not in use by students;
  • and all test administrators have been observed by the principal or his/her designee during testing to ensure that key elements of test administration and test security have been applied during the test sessions; and specifically, students have not been prompted or provided assistance beyond that which is permitted as part of standard test administration procedures. However, no evidence was provided regarding |
| | • At a Glance: SBAC District Test Administrator Workshop: VAE and Smarter Balanced Assessment Consortium | |

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.
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.

<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Evidence</th>
<th>Comments/Notes/Questions/Suggestions</th>
</tr>
</thead>
<tbody>
<tr>
<td>REVIEWED BY DEPARTMENT STAFF ONLY</td>
<td>REVIEWED BY DEPARTMENT STAFF ONLY (Record document and page # for future reference)</td>
<td>the process of collecting these forms and following up on issues identified during the monitoring. Additionally, it was not clear if the form would be required and if so, what are the consequences if not completed.</td>
</tr>
</tbody>
</table>

**Section 2.4 Summary Statement**

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

- Evidence that the State has a quality assurance plan to ensure the LEA administrators are adequately monitoring standardized test administration procedures on behalf of the State.
### Critical Element

<table>
<thead>
<tr>
<th>Evidence (Record document and page # for future reference)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Index references 2.3.2 Request for Proposals</td>
</tr>
</tbody>
</table>

### Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence

Evidence is needed that addresses the State’s process for investigating irregularities for the alternate assessment.

### 2.5 – Test Security (from 2016 review)

For R/LA and mathematics alternate assessments of alternate academic achievement standards (AA-AAAS) in grades 3-8 and HS (DLM-Int), VAE must provide:

- Evidence is needed regarding the State’s process for investigating irregularities in DLM test administration.

### Section 2.5 Summary Statement

- The following additional evidence is needed/provide brief rationale:
  - Evidence is needed that addresses the State’s process for investigating irregularities 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.
### Critical Element

<table>
<thead>
<tr>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.6 – Systems for Protecting Data Integrity and Privacy (from 2016 review)</td>
<td>Evidence is provided that describes the minimum number of students necessary to allow for public reporting of Vermont's scores and accountability determinations for all students and student groups.</td>
</tr>
</tbody>
</table>

For all components of its assessment system, VAE must provide:
- Evidence is needed regarding the minimum number of students necessary to allow reporting of scores for all students and student groups.

#### Section 2.6 Summary Statement

- No additional evidence is required

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 VERMONT (resubmission)

SECTION 5: INCLUSION OF ALL STUDENTS

<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.1 – Procedures for Including Students with Disabilities (from 2016 review)</td>
<td>Index referenced a Family Resources website, IEP form, and 2.3.1 (Overview of Request for Proposals)</td>
<td>Evidence is needed to demonstrate that parents of students with the most significant cognitive disabilities are notified that their students’ achievements are informed by alternate academic achievement standards and the possible consequences of participation in AA-AAAS. Evidence is needed that describes Vermont’s procedures for ensuring that its implementation of alternate academic achievement standards for students with the most significant cognitive disabilities promotes students’ access to the general curriculum.</td>
</tr>
<tr>
<td>Critical Element</td>
<td>Evidence (Record document and page # for future reference)</td>
<td>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</td>
</tr>
<tr>
<td>------------------</td>
<td>-------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| **5.2 – Procedures for including ELs (from 2016 review)** | • Smarter Balance Online Test – Spanish Translated Test Direction – Student resource Sheet – All Grades Mathematics  
• PPT Presentation: Accessibility and Accommodation  
• Smarter Balanced – Assessment Consortium Usable, Accessibility and Accommodation Guidelines | It is unclear why Vermont is required to provide evidence of a Spanish version of the Smarter Balanced assessments. While evidence of Spanish Translated Test Directions is provided, sufficient evidence relevant to these criteria were not provided. |

Section 5.2 Summary Statement

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

• Evidence of guidance regarding selection of the Spanish version of the Smarter Balanced assessments for English learners, and evidence of procedures for communication of this guidance to districts, schools, teachers and parents.

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.
<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.3 – Accommodations (from 2016 review)</td>
<td>• State Assessment Temporary Accommodation Request Form</td>
<td>Evidence provided for this criteria is adequate.</td>
</tr>
</tbody>
</table>

For the entire assessment system, VAE must provide:
- Evidence of a process to individually review and allow exceptional requests for a small number of students who require accommodations beyond those routinely allowed.

**Section 5.3 Summary Statement**

X No additional evidence is required

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

### Critical Element

<table>
<thead>
<tr>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.4 – Reporting (from 2016 review)</td>
<td></td>
</tr>
<tr>
<td>For the entire assessment system, VAE must provide:</td>
<td></td>
</tr>
<tr>
<td>• Evidence of the availability of score reports in alternate formats.</td>
<td></td>
</tr>
</tbody>
</table>

#### Section 6.4 Summary Statement

- Evidence is needed regarding the availability of score reports in alternate formats.

It is unclear how the State ensures the availability of score reports in alternate formats. Though a description of a process for requesting documents is provided, evidence of how this process is implemented for alternate score report formats is not specified.
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.
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 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.
SECTION 2: ASSESSMENT SYSTEM OPERATIONS

<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
</table>

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 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.
<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2.1 – Test Design and Development</strong>&lt;br&gt;(stemming from 2016 review)</td>
<td>- <em>Evidence #S021 – Evaluating Alignment in Large-Scale Standards-Based Assessment Systems</em>&lt;br&gt;- <em>Evidence #S022 – Smarter Balanced Assessment Consortium Common Core State Standards Analysis: Eligible Content for the Summative Assessment, Final Report</em>&lt;br&gt;- <em>Evidence #S023 – Race to the Top Application for New Grants Comprehensive Assessment Systems (p. 41)</em>&lt;br&gt;- <em>Evidence #12b – Smarter Balanced Content Specifications for Mathematics</em>&lt;br&gt;- <em>Evidence #S024 – PCG - Claim/Target and Common Core Standard Associations Data Input Specifications</em>&lt;br&gt;- <em>Evidence Packet #S010 – Blueprint Fidelity</em>&lt;br&gt;- <em>Evidence #S029 – Summary of Smarter Balanced CAT Algorithm on Depth of Knowledge</em></td>
<td>Peers felt that S021 was not relevant for this request.&lt;br&gt;S022 was previously provided and calls out 48 (R/LA) and 3 (Mathematics) standards as “not measurable.” However, they were judged “not measurable” using the item types proposed by SBAC: “A standard was considered measurable via on-demand summative assessment tasks if it can be assessed by any of the item types listed in the following subsection, as defined in the SBAC proposal (SBAC, 2010b, pp. 42, 52–53).” (p.9) Page 6 lists the item types. Peers feel that the standards should drive the item types / components of the assessment system. It seemed, however, that the item types were determining the assessable content, rather than the standards determining the item types / components. Regulation and Guidance clearly state “full depth and breadth for all of the academic standards.”&lt;br&gt;S023 includes a statement of intent, not evidence for this CE.&lt;br&gt;S024 described the new coding scheme for the items. Peers felt it was not relevant.&lt;br&gt;Suggestion: SBAC might provide evidence of how the other components of the assessment system (formative, interim, benchmark) cover the standards deemed ineligible for the summative, AND that the states using the SBAC incorporate those other elements meaningfully into their assessment system. (That is, those other elements contribute to scores / performance levels.)&lt;br&gt;Peers commend SBAC for conducting a thorough blueprint fidelity study, and for taking measures to correct the error identified for Grade 6 Math. We would like to see the blueprint fulfillment rates at the student level, in addition to the claim / content category level, as presented in S010a. In other words, we’d like data answering the question, “What percent of students received a test event conforming to the blueprint?,” rather than “What percent of test events fulfilled blueprint requirement X?” Peers feel that 100% blueprint fulfillment (at the student level) is implied by this CE. A reason for less than 100% blueprint fulfillment may reside in the way in which algorithm treats blueprint fulfillment as described in S029 – that is, not as an absolute constraint.</td>
</tr>
<tr>
<td>Evidence that the Smarter Balanced test design aligns the assessments to the full depth and breadth for all of the academic content standards in R/LA and mathematics at each grade level.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Evidence that the item selection procedures for the computer adaptive test (CAT) online assessment adequately deliver tests that meet test design requirements for the intended depth of knowledge (DOK) of the assessments (also applies to evidence requested for element 2.2).</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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 the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.
**Critical Element** | **Evidence (Record document and page # for future reference)** | **Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence**
---|---|---
- Evidence that, for cases where an assessment includes off-grade-level content, assessments produce grade level student achievement scores that are based only on grade-level items. | - *Evidence #S023* – Smarter Balanced Assessment Consortium Race to the Top Grant Proposal (pp. 45-46)  
- *Evidence #S025* – Smarter Balanced Mathematics Expanded Item Pools  
- *Evidence #S026* – Pool Expansion Information Presentation  
- *Evidence #S027* – 2016-17 Expanded Pool Standards Alignment  
- *Evidence Packet #S010* – Blueprint Fidelity  
- *Evidence Packet #S012* – Smarter Balanced Gap Analyses  
- *S013* | This requirement is met.  
Peers would have appreciated a clarification that when expanded pool items are used, that the relevant psychometric considerations are being addressed – e.g., that item parameters used are established for all grades spanned.  
Peers noted that several items span a relatively large grade range (roughly 20% in MA and 13% in R/LA span 3 or more grades). (Peer calculations based on S027). This seemed high.  
Peers commend SBAC for producing the gap analyses (S012). Peers believe that steps taken to bridge the gaps as described in S013 should resolve the issues.  
Peers ask that the program continue to monitor those grades/versions where blueprint fulfillment was less than 100%, as well as those where there had yet to be administrations.

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
</table>

**Section 2.1 Summary Statement**

A. Evidence that the Smarter Balanced test design aligns the assessments to the full depth and breadth for all the academic content standards in R/LA and mathematics at each grade level.

B. Evidence that the item selection procedures for the computer adaptive test (CAT) online assessment adequately deliver tests that meet test design requirements for the intended depth of knowledge (DOK) of the assessments (also applies to evidence requested for element 2.2).

C. Evidence that the item pools for all versions of the assessments (i.e., general, American Sign Language, Braille and Spanish) are sufficient to support the test design requirements. Provide, upon completion of the item development plans, evidence that 100% of test events for students receiving any version of the assessment conform to the test blueprints.

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 the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.
### Critical Element

2.2 – Item Development (stemming from 2016 review)
- See evidence regarding DOK and item pools in element 2.1 above.

<table>
<thead>
<tr>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Evidence #15a – Smarter Balanced Summative Assessment Blueprints for Mathematics</td>
<td></td>
</tr>
<tr>
<td>• Evidence #15b – Smarter Balanced Summative Assessment Blueprints for ELA/L</td>
<td></td>
</tr>
<tr>
<td>• Evidence #S008 – Smarter Balanced Math Summative CAT and Interim Assessment Item Development Plan</td>
<td></td>
</tr>
<tr>
<td>• Evidence #S009 – Smarter Balanced ELA Summative CAT and Interim Assessment Item Development Plan</td>
<td></td>
</tr>
<tr>
<td>• Evidence Packet #S010 – Smarter Balanced Blueprint Fidelity Study</td>
<td></td>
</tr>
<tr>
<td>• Evidence Packet #S012 – Smarter Balanced Gap Analyses</td>
<td></td>
</tr>
<tr>
<td>• Evidence #S013 – Gap Analysis and Development Plans</td>
<td></td>
</tr>
<tr>
<td>• Evidence Packet #S014 – Member Managed Item Development Assignments</td>
<td></td>
</tr>
<tr>
<td>• Evidence #S029 – Summary of Smarter Balanced CAT Algorithm on Depth of Knowledge</td>
<td></td>
</tr>
</tbody>
</table>

### Section 2.2 Summary Statement

_The following additional evidence is needed/provide brief rationale:_
- See 2.1 B and C.

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 the critical elements for the assessment peer review. As a result, a State should refer to the letter to the State, including the list of additional evidence needed, if any, from the Department.
### 2.3 – Test Administration
(stemming from 2016 review-individual States may provide own evidence to address this item)

- Evidence of contingency plans to address potential technology issues during test administration

<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No evidence provided.</td>
<td>Peers assume this evidence is provided by States using Smarter Balanced.</td>
</tr>
</tbody>
</table>

#### Section 2.3 Summary Statement

- _x__ No additional evidence is required of SBAC

- _x__ The following additional evidence from States using SBAC is needed/provide brief rationale:
  - Evidence of contingency plans to address potential technology issues during test administration.
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 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 Smarter Balanced Assessment Consortium**

<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
</table>
| **3.1 – Overall Validity, including Validity Based on Content** (stemming from 2016 peer review) | - Evidence as noted for all item pools in element 2.1 above.  
- Evidence of a summary report that the CAT administered test forms matched test blueprints.  
- Evidence that Smarter Balanced assessments that include off-grade level content conform to the on-grade level blueprint for the assessment.  
- Evidence of alignment of sample test forms for grades 3, 4, 6 and 7 in R/LA and mathematics. | - See Comments in 2.1.  
- Evidence #S006 – South Dakota Technical Report 2014-2015 (pp. 44-49)  
- Evidence Packet #S010 – Blueprint Fidelity  
- Evidence Packet #012 – Smarter Balanced Gap Analyses | - See Comments in 2.1, bullets 2 and 4. The evidence was provided but it does not support the claim that the CAT administered test forms matched the test blueprints in every case.  
- Evidence Packet #S010 – Blueprint Fidelity | - This evidence has been provided. See Comment in 2.1, bullet 3.  
| | - Evidence #S011 – Smarter Balanced Technical Report, 2015-2016 (pp. 6-6 through 6-9) | - The WestEd alignment study (S032) assessed the extent to which each item in the noted grades matched its targeted CCSS standard. However, for DoK (cognitive complexity), the study did not assess the extent to which each item matched the cognitive complexity implied by its targeted standard. Rather, it documented experts’ judgments of the level of cognitive complexity at which the item appears to be assessing the standard. The study’s design can furnish appropriate evidence to support (or refute) a claim concerning the degree of content alignment between items and standards, but it cannot provide appropriate evidence for a claim about the match between the cognitive complexity of a test and the cognitive complexity of the standards to which the test is written.  
- Evidence #S030 – WestEd Alignment Study Proposal  
- Evidence #S032 – WestEd Alignment Study | - Peers felt that the study does not address the question “Does the item match the DoK of the standard?”  
| | - Evidence #104 – Fordham Institute – Evaluating the Content and Quality of Next Generation Assessments (p. 18)  
- Evidence #S008 – Smarter Balanced Math Summative CAT and Interim Assessment Item | - The measures taken to improve alignment are entirely appropriate. However, evidence of improved alignment was not provided. Peers expected to see a before-after comparison. |

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 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.
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 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.
<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
</table>
| **3.3 – Validity Based on Internal Structure**  
(stemming from 2016 peer review-States may address this with State-level data)  
- Evidence that supports the internal structure of the Smarter Balanced assessments using operational data from the summative assessments (e.g., a correlational analysis of subscores and total scores). | - Evidence #S004 - Assessing the Dimensionality of Smarter Balanced Summative Tests (pp. 2-4). | S004 provides the evidence requested.  
Recommendation: Peers recognize the challenge of assessing dimensionality using item scores in a CAT context; SBAC could contribute meaningfully to the literature on this topic by taking it on as a special research study. |

**Section 3.3 Summary Statement**  
_x__ No additional evidence is required

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 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.
### 3.4 – Validity Based on Relationships with Other Variables
(stemming from 2016 peer review-States may address this with State-level data)

- Validity evidence that shows the Smarter Balanced assessment scores are related as expected with other variables for all student groups (e.g., comparison of subscore relationships within content areas to those across content areas; a confirmatory factor analysis of math & R/LA together; or other analyses that demonstrate positive correlations between assessment results and external measures that assess similar constructs).

<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
</table>
| 3.4 – Validity Based on Relationships with Other Variables | - *Evidence #S004 – Assessing the Dimensionality of Smarter Balanced Summative Test* (pp. 2-5)  
- *Evidence #S007 – Dimensionality of the SBAC: An argument for its validity*  
- *Evidence #S031 – South Dakota BOR Policy* | Peers appreciated the concurrent validity studies for high school R/LA and Math (S005 and S006). We believe that these studies help establish external validity evidence for the program.  
However, no evidence of validity based on relationships with other variables was provided for Grades 3-8 Math and R/LA.  
Please provide the results of a study or studies addressing this CE, such as correlations between SBAC scores and grades or correlations between SBAC adjacent grade scores. |

### Section 3.4 Summary Statement
_x__ The following additional evidence is needed/provide brief rationale:

- Validity evidence that shows the Smarter Balanced assessment scores are related as expected with other variables for all student groups for Grades 3-8 R/LA and Math.

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 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.
SECTION 4: TECHNICAL QUALITY - OTHER

<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
</table>
| 4.2 – Fairness and Accessibility (stemming from 2016 peer review-States may address this with State-level data) | • *Evidence S011* – Smarter Balanced Assessment Consortium Draft 2015-16 Technical Report, Chapter 2  
• *Index* | Estimated reliabilities for the tests administered to these students are in the Index in Tables 11.1 and 11.2. Peers note that a few of the coefficients are low enough to raise concerns.  
It would be helpful in evaluating Tables 11.1 and 11.2 to know the source(s) of the data.  
Peers request a clarification about how item development plans (S013) specifically address the pool factors that are related to the low reliabilities for special versions of the test.  
Peers are also concerned by the statement in the Index “Students with lower scores have lower reliability than those with higher scores.” (p. 57). We were not sure that it was accurate. |

Section 4.2 Summary Statement

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

• Peers request a clarification about how item development plans (S013) specifically address the pool factors that are related to the low reliabilities for special versions of the test.

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

## Critical Element

<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
</table>
| **4.3 – Full Performance Continuum** (stemming from 2016 peer review) | • Evidence #015a – Final Blueprint for Mathematics Summative Assessment  
• Evidence #015b – Final Blueprint for ELA/L Summative Assessment  
• Evidence Packet #S010 – Smarter Balanced Blueprint Fidelity Study  
• Evidence Packet #S012 – Smarter Balanced Gap Analyses | See Comments for 2.1. |

### Section 4.3 Summary Statement

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

- See 2.1 B and C.
### Critical Element

<table>
<thead>
<tr>
<th>4.4 – Scoring (stemming from 2016 peer review-States may address this with State-level evidence)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Evidence that Smarter Balanced has clear, unambiguous criteria, including minimum thresholds, to ensure and document inter-rater reliability for States that are conducting hand-scoring of Smarter Balanced performance items.</td>
</tr>
<tr>
<td>• Evidence that the State has monitored the quality and reliability of performance task scoring conducted during its test administration for the Smarter Balanced tests.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Evidence (Record document and page # for future reference)</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Peers appreciate the new guidance provided by the Consortium (S001). We believe the evidence requested was provided.</td>
</tr>
<tr>
<td>Peers’ understanding is that this evidence is to be provided by States using Smarter Balanced.</td>
</tr>
</tbody>
</table>

### Section 4.4 Summary Statement

|x__ No additional evidence is required of SBAC |

_x__ The following additional evidence from States using SBAC is needed/provide brief rationale: |

• Evidence that the State has monitored the quality and reliability of performance task scoring conducted during its test administration for the Smarter Balanced tests.

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 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.
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 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.
<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
</table>
| 5.2 – Procedures for including ELs (stemming from 2016 peer review—States may address this with State-level evidence) | • Evidence #11a – Usability, Accessibility, and Accommodations Guidelines (p. 11; pp. 32-33)  
• Evidence #88 – Usability, Accessibility, and Accommodations Implementation Guide  
• Evidence #69h – Accessibility and Accommodations Training Module (Slide 59)  
• Evidence #99 – Resources and Practices Comparison Crosswalk (p. 4)  
• Evidence #127 – ISAAP Training Module Screenshot  
• Evidence #3002 – UAAG Survey  
• Evidence #3003 – Including All Students in Assessments Digital Library Module  
• Evidence #3020 – Template Letter for Parents of English Learners | The SBAC response shows where to locate evidence of the guidance in the original submission, and evidence of communication of this guidance to school personnel. Provision of #3020 shows evidence of communication of this guidance to parents.  
The Peers understand that provision of greater specificity beyond the guidance provided by SBAC is a State level responsibility for any State using SBAC. |

**Section 5.2 Summary Statement**

_x__ No additional evidence is required of SBAC

_x__ The following additional evidence from States using SBAC is needed/provide brief rationale:

- Evidence of guidance regarding selection of the Spanish version of the Smarter Balanced assessments for English learners at a level of specificity such that an educator can apply the decision for an individual student.

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 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.
<table>
<thead>
<tr>
<th>Critical Element</th>
<th>Evidence (Record document and page # for future reference)</th>
<th>Comments/Notes/Questions/Suggestions Regarding State Documentation or Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>5.3 – Accommodations</strong> <em>(stemming from 2016 peer review-States may address this with State-level evidence)</em>&lt;br&gt; Evidence of a process to individually review and allow exceptional requests for a small number of students who require accommodations beyond those routinely allowed.</td>
<td></td>
<td>SBAC did not provide evidence for this request.&lt;br&gt;Peers’ understanding is that States using Smarter Balanced are to provide this evidence.</td>
</tr>
</tbody>
</table>

**Section 5.3 Summary Statement**

- _x__ No additional evidence is required of SBAC
- _x__ The following additional evidence from States using SBAC is needed/provide brief rationale:
  - Evidence of a process to individually review and allow exceptional requests for a 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 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.