



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Tony Evers
State Superintendent
Wisconsin Department of Public Instruction
125 South Webster Street
Madison, WI 53703

January 13, 2017

Dear Superintendent Evers:

Thank you for your participation in the U.S. Department of Education's (Department) assessment peer review process under Title I of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the No Child Left Behind Act of 2001 (NCLB). The Every Student Succeeds Act (ESSA) maintains the essential requirements from NCLB that each State annually administer high-quality assessments in at least reading/language arts, mathematics, and science that meet nationally recognized professional and technical standards. Therefore, as you know, the Department reinstated peer review of State assessment systems so that each State receives feedback from external experts on the assessments it is currently administering. We appreciate the efforts required to prepare for the peer review, which occurred in June 2016. State assessment systems provide essential information that States, districts, principals, and teachers can use to identify the academic needs of students, target resources and supports toward students who need them most, evaluate school and program effectiveness, and close achievement gaps among students. A high-quality assessment system also provides useful information to parents about their child's advancement against and achievement of grade-level standards. The Department's peer review of State assessment systems is designed to provide feedback to States to support the development and administration of high-quality assessments.

On October 6, 2016, the Department sent a letter to chief State school officers outlining the outcomes for States related to the assessment peer review. I am writing to provide you feedback on your State's recent submission of evidence. External peer reviewers and Department staff evaluated the Wisconsin Department of Public Instruction's (WIDPI) submission and found, based on the evidence received, that the components of your assessment system meet some, but not all of the statutory and regulatory requirements of section 1111(b)(1) and (3) of the ESEA, as amended by NCLB. Based on the recommendations from this peer review and our own analysis of the State's submission, I have determined the following:

- Reading/language arts (R/LA) and mathematics general assessments in high school (ACT): **Partially meets requirements.**
- R/LA and mathematics alternate assessments based on alternate academic achievement standards (AA-AAAS) in grades 3-8 and high school (Dynamic Learning Maps-Year-End Model (DLM-YE)): **Substantially meets requirements**

The components that **substantially meet requirements** meet most of the requirements of the statute and regulations but some additional information is required. The Department expects that WIDPI should be able to provide this additional information within one year.

The component that **partially meet requirements** does not meet a number of the requirements of the statute and regulations and WIDPI will need to provide substantial additional information to demonstrate it meets

the requirements. The Department expects that WIDPI may not be able to submit all of the required information within one year.

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

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

In addition, the full peer review notes from the review are enclosed. These recommendations to the Department formed the basis of the Department's 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 Lisa Sadeghi or Porscheoy Brice of my staff at: OSS.Wisconsin@ed.gov.

Sincerely,

/s/

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

Enclosures

cc: Visalakshi Somasundaram, Director of Student Assessment

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

| Critical Element | Additional Evidence Needed |
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| 1.5 – Participation Data | <p>WIDPI must provide:</p> <ul style="list-style-type: none"> • Evidence of test participation for the State assessments in science. |
| 2.1 – Test Design and Development | <p>For the reading/language arts (R/LA) and mathematics general assessments in high school (ACT), WIDPI must provide:</p> <ul style="list-style-type: none"> • Evidence that the test design measures the full range of the State’s grade-level academic content standards (e.g., evidence of alignment of the test design blueprint to academic content standards). This evidence should include information about the State’s plan to assess the full breadth of the State’s R/LA standards, including speaking and listening. (Note: WIDPI has received a speaking and listening waiver; therefore, the Department does not expect WIDPI to submit additional evidence regarding speaking and listening during the period of the waiver). • Evidence for the R/LA tests that describe the use of writing and reading test scores to support the intended interpretations and use of the results for R/LA accountability purposes. <p>For R/LA AA-AAAS in grades 3-8 and high school (DLM-YE), WIDPI must provide:</p> <ul style="list-style-type: none"> • Evidence that the assessment design measures the State’s academic content standards, including the language domain, or presents an explanation as to why this domain was not included. |
| 3.1 – Overall Validity, including Validity Based on Content | <p>For the R/LA and mathematics general assessments in high school (ACT), WIDPI must provide:</p> <ul style="list-style-type: none"> • Evidence that independently establishes alignment, specifically that: <ul style="list-style-type: none"> ○ Each assessment is aligned to its test blueprint, and each blueprint is aligned to the full range of State’s academic content standards, including speaking and listening in R/LA (Note: WIDPI has received a speaking and listening waiver; therefore, the Department does not expect WIDPI to submit additional evidence regarding speaking and listening during the period of the waiver); or ○ Each assessment is aligned to the full range of the State’s academic content standards, and the procedures the State follows to ensure such alignment during test development; and ○ Describes a systematic process and timeline to address any gaps or weaknesses identified through analysis of alignment. • See evidence in 2.1 above regarding the use of writing and reading test scores to support the intended interpretations and use of the results for R/LA accountability purposes. |
| 3.3 – Validity Based on Internal Structure | <p>For the R/LA general assessments in high school (ACT), WIDPI must provide:</p> <ul style="list-style-type: none"> • Evidence that establishes the ACT reading, English, and writing tests as a single R/LA construct. Evidence may include: <ul style="list-style-type: none"> ○ Reports of analyses of the internal structure of the assessments (e.g., tables of item correlations) that show the extent to which the |

| Critical Element | Additional Evidence Needed |
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| | <p>interrelationships among subscores are consistent with the State’s academic content standards for relevant student groups; OR</p> <ul style="list-style-type: none"> ○ Reports of analyses that show the dimensionality of the assessment is consistent with the structure of the State’s academic content standards and the intended interpretations of results; OR ○ Evidence that ancillary constructs needed for success on the assessments do not provide inappropriate barriers for measuring the achievement of all students, such as evidence from cognitive labs or documentation of item development procedures; OR ○ Reports of differential item functioning (DIF) analyses that show whether particular items (e.g., essays, performance tasks, or items requiring specific knowledge or skills) function differently for relevant student groups. |
| <p>3.4 – Validity Based on Relationships with Other Variables</p> | <p>For the R/LA and mathematics general assessments in high school (ACT), WIDPI must provide:</p> <ul style="list-style-type: none"> ● Evidence that shows the assessment scores are related as expected with criterion and other variables for all student groups (e.g., reports of analyses that demonstrate positive correlations between State assessment results and assessments of the same content area administered by some or all districts in the State). |
| <p>4.1 – Reliability</p> | <p>For the R/LA general assessments in high school (ACT), WIDPI must provide:</p> <ul style="list-style-type: none"> ● Evidence that supports the reliability for the composite R/LA test scores using the State’s data from test administration, such as: <ul style="list-style-type: none"> ○ Reliability estimates for the State overall and major reporting sub-groups. ○ Standard error of measurement for the State overall and major reporting sub-groups. ○ Estimates of classification accuracy and decision consistency for the State overall and major reporting sub-groups. <p>For R/LA AA-AAAS in grades 3-8 and high school (DLM-YE), WIDPI must provide:</p> <ul style="list-style-type: none"> ● Evidence of monitoring and refinement of the diagnostic classification models from subsequent test administrations. |
| <p>4.2 – Fairness and Accessibility</p> | <p>For R/LA AA-AAAS in grades 3-8 and high school (DLM-YE), WIDPI must provide:</p> <ul style="list-style-type: none"> ● Evidence of the development and selection of reading passages that includes information about steps that test developers have taken to ensure reading passages are accessible to students with significant cognitive disabilities. ● Evidence of the development and selection and/or creation of graphic components in the assessment (e.g., drawn or photographed images) that includes information about steps that test developers have taken to ensure passages from general grade-level texts are made accessible to students with the most significant cognitive disabilities. |
| <p>4.4 – Scoring</p> | <p>For the R/LA general assessments in high school (ACT), WIDPI must provide:</p> |

| Critical Element | Additional Evidence Needed |
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| | <ul style="list-style-type: none"> Evidence on the hand scoring for the writing tests, such as rater recruiting criteria, training, range finding/calibration, validity papers, and procedures to reconcile discrepant ratings among human scorers. <p>For R/LA AA-AAAS in grades 3-8 and high school (DLM-YE), WIDPI must provide:</p> <ul style="list-style-type: none"> Evidence of monitoring procedures used for scoring DLM-YE writing items, including measures of inter-rater reliability. |
| 4.7 – Technical Analysis and Ongoing Maintenance | <p>For the R/LA and mathematics general assessments in high school (ACT), WIDPI must provide:</p> <ul style="list-style-type: none"> Evidence of regular internal and external technical review of the ACT testing program in the State, such as minutes from technical advisory committee (TAC) meetings and documentation of roles and responsibilities of TAC members. |
| 5.1 – Procedures for Including Students with Disabilities | <p>For the R/LA and mathematics general assessments in high school (ACT), WIDPI must provide:</p> <ul style="list-style-type: none"> Evidence that clarifies what specific accessibility tools are available to all students, including students with disabilities, taking the ACT tests. <p>For R/LA AA-AAAS in grades 3-8 and high school (DLM-YE), WIDPI must provide:</p> <ul style="list-style-type: none"> Evidence of clear explanations for parents of the differences between assessments based on grade-level academic achievement standards and AA-AAAS, including any effects of State and local policies on a student’s education resulting from taking an AA-AAAS. |
| 5.2 – Procedures for Including ELs | <p>For the R/LA and mathematics general assessments in high school (ACT), WIDPI must provide:</p> <ul style="list-style-type: none"> As noted in element 5.1, evidence that clarifies what specific accessibility tools are available to all students, including ELs, taking the ACT tests. |
| 5.3 – Accommodations | <p>For the R/LA and mathematics general assessments in high school (ACT), WIDPI must provide:</p> <ul style="list-style-type: none"> Evidence of a process to determine 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. |
| 5.4 – Monitoring Test Administration for Special Populations | <p>For the R/LA and mathematics general assessments in high school (ACT) and the R/LA and mathematics AA-AAAS (DLM-YE), WIDPI must provide:</p> <ul style="list-style-type: none"> Evidence of a process for monitoring testing of students with disabilities and ELs to ensure that they are appropriately included in assessments and receive accommodations that are: <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; |

| Critical Element | Additional Evidence Needed |
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| | <ul style="list-style-type: none"> ○ Consistent with the assessment accommodations identified by a student’s IEP Team or 504 team for students with disabilities, or another process for an EL; and ○ Administered with fidelity to test administration procedures. |
| <p>6.2 – Achievement Standards-Setting</p> | <p>For the R/LA and mathematics general assessments in high school (ACT), WIDPI must provide:</p> <ul style="list-style-type: none"> ● Evidence that provides greater detail about the achievement standard setting process, including: <ul style="list-style-type: none"> ○ A description of the standards-setting method and process used by the State; ○ The rationale for the method selected; ○ Documentation that the method used for setting cut scores allowed panelists to apply their knowledge and experience in a reasonable manner and supported the establishment of reasonable and defensible cut scores; ○ Documentation of the process used for setting cut scores and developing performance-level descriptors aligned to the State’s academic content standards; ○ A description of the process for selecting panelists; ○ Documentation that the standards-setting panels consisted of panelists with appropriate experience and expertise, including: <ul style="list-style-type: none"> ▪ Content experts with experience teaching the State’s academic content standards in the tested grades; ▪ Individuals with experience and expertise teaching students with disabilities, English learners and other student populations in the State; ▪ As appropriate, individuals from institutions of higher education and individuals knowledgeable about career-readiness; and ▪ A description, by relevant characteristics, of the panelists (overall and by individual panels) who participated in achievement standards setting. |
| <p>6.3 – Challenging and Aligned Academic Achievement Standards</p> | <p>For the R/LA and mathematics general assessments in high school (ACT), WIDPI must provide:</p> <ul style="list-style-type: none"> ● Evidence that the State’s academic achievement standards are aligned with the State’s academic content standards. ● Evidence that the State’s academic achievement standards are challenging. |
| <p>6.4 – Reporting</p> | <p>For the R/LA and mathematics general assessments in high school (ACT), WIDPI must provide:</p> <ul style="list-style-type: none"> ● Evidence that test score reports and supporting material (a) reflect the State’s test reporting categories (i.e., a single score for R/LA), and (b) provide information on the State’s academic achievement levels. ● Evidence that the score reports are available in alternative formats. ● Evidence of a process and timeline for delivering reports to students, parents, teachers, principals, and other stakeholders as soon as practicable after each test administration. ● Evidence of materials that support parents and educators in the use and interpretation of test scores. |

