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To: racetothetop.assessment@ed.gov

Subject: Public comments for Race to the Top Assessment Public Meeting 8.10.11

Let be more explicit about the implications posed by the interoperability concerns posed in #1 below.

- EL test scores reported *within* the PARCC and SBAC consortia will not be consistent across the member states *if* the EL PNPs (and EL access needs/embedded accommodations) for the content tests are determined in part by ELP tests with 2 different levels, cut points, etc.
- EL test scores reported to ED that is disaggregated by ELP level (possible future requirements for EL accountability data for the reauthorized ESEA?) will not be comparable within and across the 2 consortia *if* the 2 ELP tests have different levels, cut points, etc.

Perhaps PARCC and SBAC will come to a mutual agreement with the ELP test designers or perhaps this outcome will need facilitation from ED.

Thanks for your time and consideration of these issues.

Please allow me to submit the following public comments:

1. If, as Mike Russell suggested during the meeting, there should be a consistent set of business rules for how test item writers define the test construct, could there be a similar effort to establish a consistent set of business rules (or standard) to define (1) heterogeneity in the Personal Needs Profiles (PNPs) and (2) the representational boundaries which will not violate the construct.

In this way, it would be possible to compare student results across and within the 2 consortia since the scores would have underlying consistency.

The underlying question I have: To what extent will the Principle of Interoperability be applied to the tests and scores generated by PARCC and SBAC and by the ELP EAG assessment consortia (assuming 2 are funded)? There are 4 possible combinations of content assessments and ELP assessments. Will these 4 different combinations of student data be comparable?

Table 1. Possible EL student data combinations for States (content test data + ELP test data)

	PARCC Content Tests	SBAC Content Tests
WI ELP Test	States with EL student data combination 1	States with EL student data combination 2
CA ELP Test	States with EL student data combination 3	States with EL student data combination 4

2. When, by whom, and based on what evidence base will the business rules for applying the Personal Needs Profiles (PNP) be determined? Will the findings of recent Enhanced Assessment

Grants (such as STELLA/AVAD) be used as a foundation? From there, will a body of research be conducted on effective student PNPs and how to use them?

3. On a practical level, if ELs and SWD are being more closely intertwined in some areas of test development and state accountability systems (as either Special Populations or Diverse Learners), will federal requirements for these groups be appropriately aligned?

Examples:

- **CSPR requirements** for reporting state accountability data on accommodations (no current requirement for ELs)
- State standards and assessment **peer review requirement** to align instructional and assessment accommodations (concept of instructional accommodations gets confused with other differentiated support which may be offered ELs);
- **IDEA requirement** for decision-making team and adding an IEP-like individual student learning plan for ELs (not just a *district* EL plan as now **required in Title III**).

Thank you,
Lynn

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