



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Desi D. Nesmith  
Interim Commissioner  
Connecticut State Department of Education  
P.O. Box 2219  
Hartford, CT 06145

**AUG 28 2019**

Dear Interim Commissioner Nesmith:

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 Every Student Succeeds Act (ESSA). I appreciate the efforts of the Connecticut State Education Department (CSDE) to prepare for the English language proficiency (ELP) peer review, which occurred in April 2019. Specifically, CSDE submitted evidence regarding the LAS Links, the State's general ELP assessment.

The ESEA and its implementing regulations require a State to ensure that its local education agencies (LEAs) provide an annual ELP assessment of all English learners (ELs) in grades K-12 in schools served by the State (ESEA section 1111(b)(2)(G); 34 CFR § 200.6(h)). Specifically, the ESEA requires a State to develop a uniform statewide ELP assessment to measure ELP of all ELs in the State, including ELs with disabilities, and to provide an alternate ELP assessment (AELPA) for ELs who are students with the most significant cognitive disabilities who cannot participate in the regular ELP assessment even with accommodations (ESEA section 1111(b)(2)(G); 34 CFR § 200.6(h)(1), (5)). The ESEA and its implementing regulations require that a State's ELP assessments, including the AELPA, be aligned with the State's ELP standards, provide valid and reliable measures of the State's ELP standards, and be of adequate technical quality (ESEA section 1111(b)(2)(G); 34 CFR §§ 200.2(b)(2), (b)(4), (b)(5), 200.6(h)(2)).

External peer reviewers and Department staff carefully evaluated CSDE's submission and the Department found, based on the evidence received, that this component of your assessment system met some, but not all of the statutory and regulatory requirements of the ESEA. Based on the recommendations from this peer review and our own analysis of the State's submission, I have determined the following:

- General ELP assessment (LAS Links): **Partially meets requirements of the ESEA, as amended by ESSA.**

An assessment that partially meets requirements does not meet a number of the requirements of the statute and regulations and CSDE will need to provide substantial additional information to demonstrate it meets the requirements. The Department realizes that this was the first time your State was required to provide its ELP assessment for peer review and recognizes that it may take some time to address all of the required items. The specific list of items required for CSDE to submit is enclosed with this letter.

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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.*

I also note that CSDE did not submit evidence for an alternate ELP assessment for ELs with significant cognitive disabilities who are unable to take the regular ELP assessment. Within 30 days, CSDE must provide a plan and timeline for submitting all required documentation for the LAS Links for peer review and the development and administration of an alternate ELP assessment, including when this required assessment will be submitted for peer review. Resubmission should occur once all necessary evidence is complete (rather than in multiple submissions). The Department is placing a condition on CSDE's Title I, Part A grant award. The condition shall remain until CSDE's ELP and alternate ELP assessments have been determined to meet all requirements. If adequate progress is not made, the Department may take additional action.

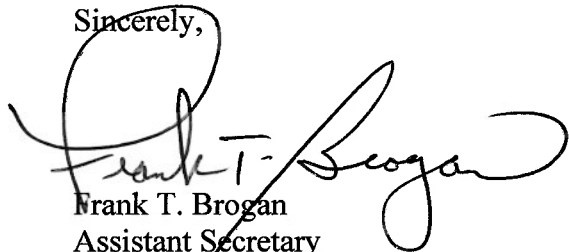
Additionally, the Office of Special Education and Rehabilitative Services (OSERS) will monitor progress on matters pertaining to requirements in the Individuals with Disabilities Education Act (IDEA) related to the participation of students with disabilities in Title I assessments. In particular, OSERS will monitor progress against critical elements 1.4, 4.2, 5.3, and 5.4. Insufficient progress to address such matters may lead OSERS to place a condition on CSDE's fiscal year 2020 IDEA Part B grant award.

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 my staff at: [ESEA.Assessment@ed.gov](mailto:ESEA.Assessment@ed.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Frank T. Brogan". The signature is fluid and cursive, with a large loop at the beginning and end.

Frank T. Brogan  
Assistant Secretary  
for Elementary and Secondary Education

Enclosures

cc: Ajit Gopalakrishnan, Chief Performance Officer

**Critical Elements Where Additional Evidence is Needed to Meet the Requirements for Connecticut’s Use of the LAS Links as an English Language Proficiency (ELP) Assessment**

<b>Critical Element</b>	<b>Additional Evidence Needed</b>
<b>1.3 – Required ELP Assessments</b>	<p>For the statewide assessment system:</p> <ul style="list-style-type: none"> <li>• Evidence that the State includes English learners (ELs) with significant cognitive disabilities in statewide ELP assessment, either through the general ELP assessment or an alternate ELP assessment (AELPA). If the State does not have an AELPA, it should provide a timeline for when it plans to implement one.</li> </ul>
<b>1.4 – Policies for Including All ELs in ELP Assessments</b>	<p>For the statewide assessment system:</p> <ul style="list-style-type: none"> <li>• As noted in critical element 1.3, evidence that the State has policies that include ELs with significant cognitive disabilities in statewide ELP assessment, either through the general ELP assessment or an AELPA.</li> </ul>
<b>2.1 – Test Design and Development</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence that the test design and test development process is well-suited for the content, aligns the assessments to the depth and breadth of the State’s ELP standards, and includes: <ul style="list-style-type: none"> <li>○ Statement of all intended interpretations and uses of results.</li> <li>○ Test blueprints that describe the structure of each assessment in sufficient detail to support the development of assessments that are technically sound, measure the depth and breadth of the State’s ELP standards, and support the intended interpretations and uses of the results (e.g., a plan and timeline to address coverage gaps as found in the alignment evidence; a cross-walk between CSDE ELP standards and LAS Links standards).</li> </ul> </li> </ul>
<b>2.2 – Item Development</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence that the State uses reasonable and technically sound procedures to develop and select items to assess student ELP based on the State’s ELP standards in terms of content and language processes (e.g., additional information regarding: 1) the selection and training of item writers; 2) qualifications and experience of item writers; 3) an overall item development plan; 4) test item specifications for selected-response and constructed-response items; and 5) detailed procedures to review and evaluate the quality of items before operational use).</li> </ul>
<b>2.4 – Monitoring Test Administration</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence that the State adequately monitors the administration of its State ELP assessments to ensure that standardized test administration procedures are implemented with fidelity across districts and schools. Adequate monitoring could be demonstrated by evidence such as: <ul style="list-style-type: none"> <li>○ A brief description of the State’s overall approach to monitoring ELP test administration (e.g., monitoring conducted by State staff, through regional centers, by districts with support from the State, or another approach); or</li> <li>○ Existing written documentation of the State’s procedures for monitoring test administration across the State, including, for example, strategies for selection of districts and schools for monitoring, cycle for reaching</li> </ul> </li> </ul>

Critical Element	Additional Evidence Needed
	<p>schools and districts across the State, training on monitoring, observation forms, schedule for monitoring, monitors' roles, and the responsibilities of key personnel.</p>
<p><b>2.5 – Test Security</b></p>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence that 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: <ul style="list-style-type: none"> <li>○ Detection of test irregularities (e.g., a detailed description of the data forensics program; evidence of training provided to local educational agency staff about the use of vendor software that can be used to detect online testing irregularities).</li> <li>○ Prevention of any assessment irregularities, including maintaining the security of test materials (e.g., a rationale for the relatively limited number of operational forms of the assessment).</li> <li>○ Remediation following any test security incidents involving any of the State's ELP assessments (e.g., evidence of how the State responds to and tracks testing irregularities).</li> </ul> </li> </ul>
<p><b>3.1 – Overall Validity, including Validity Based on Content</b></p>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• As noted in critical element 2.1, documentation of adequate alignment between the State's ELP assessment and the ELP standards the assessment is designed to measure in terms of the depth and breadth of the State's ELP standards across all proficiency levels, domains, and modalities identified therein (e.g., a plan and timeline to address coverage gaps as found in the alignment evidence; a cross-walk between CSDE ELP standards and LAS Links standards).</li> </ul>
<p><b>3.3 – Validity Based on Internal Structure</b></p>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Adequate validity evidence that the scoring and reporting structures of its assessments are consistent with the sub-domain structures of the State's ELP standards on which the intended interpretations and uses of results are based (e.g., analyses exploring the dimensionality of the LAS Links assessment, especially as it relates to the State's ELP standards; interpretation of the differential item functioning (DIF) study results in order to strengthen the claim concerning the validity of the internal structure).</li> </ul>
<p><b>3.4 – Validity Based on Relationships with Other Variables</b></p>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Validity evidence that the State's assessment scores are related as expected with other variables (e.g., studies of relationships of the ELP tests with mathematics and science academic assessments and additional means of measuring the associations with the reading/language arts assessments (R/LA), such as observed correlations, box plots and empirical cumulative distribution functions showing the distribution of R/LA scale scores by ELP status).</li> </ul>
<p><b>4.1 – Reliability</b></p>	<p>For the LAS Links:</p>



Critical Element	Additional Evidence Needed
	<ul style="list-style-type: none"> <li>• Reliability evidence for its assessments for the following measures of reliability for the State’s student population overall and each student group consistent with nationally recognized professional and technical testing standards, specifically:               <ul style="list-style-type: none"> <li>○ Evidence of a plan to improve the reliability and precision of the listening domain sub-test.</li> <li>○ Consistency and accuracy of estimates in categorical classification decisions for the cut scores, achievement levels or proficiency levels based on the assessment results for each domain.</li> </ul> </li> </ul>
<b>4.2 – Fairness and accessibility</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence the State has taken reasonable and appropriate steps to ensure that its assessments are accessible to all EL students and fair across student groups, including ELs with disabilities, in their design, development, and analysis. Examples include:               <ul style="list-style-type: none"> <li>○ Interpretations of how the results of the DIF analysis support fairness and accessibility.</li> <li>○ Evidence of item data reviews including the frequency of occurrence, qualifications of the reviewers, the number of items reviewed and specific details concerning review criteria and rules, and a summary of review decisions.</li> <li>○ Additional documentation reflecting the training of reviewers, the qualifications of reviewers, a schedule of bias and sensitivity reviews, and the number of items reviewed, and a summary of review decisions.</li> </ul> </li> </ul>
<b>4.3 – Full Performance Continuum</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence that the listening assessment provides an adequately precise estimate of student performance across the full performance continuum, including performance for EL students with high and low levels of English language proficiency.               <ul style="list-style-type: none"> <li>○ Specifically, a plan to improve the reliability and precision of the listening domain sub-test as noted in critical element 4.1 would also address this critical element.</li> </ul> </li> </ul>
<b>4.4 – Scoring</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• For ELs with a disability that precludes assessment of the student in reading or writing such that there are no appropriate accommodations for the affected domain(s), a description of the State’s process for how it will ensure that the student is assessed in the remaining domains in which it is possible to assess the student (e.g., how the exemption applies specifically to the reading and writing domains; how the exemption will apply and a score will be calculated when more than one domain exemption is present).</li> </ul>
<b>4.5 – Multiple Assessment Forms</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence that the State ensures that all forms adequately represent the State’s ELP standards and yield consistent score interpretations such that the forms are comparable within and across settings (e.g., results from the equating of the various forms of the assessment).</li> </ul>

Critical Element	Additional Evidence Needed
<b>4.6 – Multiple Versions of an Assessment</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence that the State followed a design and development process to support comparable interpretations of results for students tested across the versions of the assessments (paper, computer-based, and Braille).</li> </ul>
<b>4.7 – Technical Analysis and Ongoing Maintenance</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence that the State is implementing its plan to monitor, maintain, and improve, 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 (e.g., evidence of a concrete timeline to implement the plan).</li> <li>• Evidence that assessment technical quality information is made public, including on the State’s website.</li> </ul>
<b>5.1 – Procedures for Including Students with Disabilities</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence requested in critical element 4.4 will be sufficient to address this element.</li> </ul>
<b>5.3 – Accommodations</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence that the State 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.</li> <li>• Evidence that the State makes available appropriate accommodations and ensures that its ELP assessments are accessible to ELs with disabilities, specifically ELs with significant cognitive disabilities.</li> </ul>
<b>5.4 – Monitoring Test Administration for Special Populations</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence that the State monitors test administration in its districts and schools to ensure that appropriate assessments, with or without accommodations, are selected for all students with disabilities and ELs so that they are appropriately included in assessments and receive accommodations that are: <ul style="list-style-type: none"> <li>○ Consistent with the State’s policies for accommodations.</li> <li>○ Appropriate for addressing a student’s disability or language needs for each assessment administered.</li> <li>○ Consistent with accommodations provided to the students during instruction and/or practice.</li> <li>○ This evidence could include, for example: (1) training materials for monitors, (2) a description of the frequency of monitoring visits, (3) a procedure for the selection of monitoring sites, (4) evidence of how the State uses the observation form and the tools embedded in the online system to keep track of accommodations provided, (5) information regarding any technical assistance given to sites during monitoring visits, (6) specific monitoring protocols the State uses during visits, (7) a summary of results from the most recent year of monitoring, and (8) a</li> </ul> </li> </ul>

Critical Element	Additional Evidence Needed
	description of the process for the use of monitoring results to improve implementation.
<b>6.1 – State Adoption of ELP Achievement Standards for All Students</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence that the State adopted ELP achievement standards that address the different proficiency levels of ELs.</li> </ul>
<b>6.2 – Achievement Standards-Setting</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence that the State used a technically sound method and process that involved panelists with appropriate experience and expertise for setting ELP achievement standards (i.e., evidence that the test cut scores were based on the State’s ELP standards).</li> </ul>
<b>6.3 – Challenging and Aligned ELP Achievement Standards</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence that the State has ensured that ELP assessment results are expressed in terms that are clearly aligned with the State’s ELP standards and its ELP performance-level descriptors.</li> </ul>
<b>6.4 – Reporting</b>	<p>For the LAS Links:</p> <ul style="list-style-type: none"> <li>• Evidence that the State provides coherent and timely information about each student’s attainment of the State’s ELP standards to parents that: <ul style="list-style-type: none"> <li>○ Reports the ELs’ English proficiency in terms of the State’s grade level/grade-band ELP standards (including performance-level descriptors).</li> <li>○ Are provided in alternative formats upon request.</li> </ul> </li> </ul>