Lessons From the Initial Peer Review of
Alternate Assessments Based On Modified Achievement Standards

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Introduction

Purpose

In March 2008, six States submitted evidence for Title I Peer Review of their alternate assessment based on modified achievement standards (AA-MAS). Although none of these States met all of the requirements, each State was able to provide adequate evidence for a number of the elements. However, several specific requirements emerged as problematic across all States. The purpose of this paper is to provide additional clarification to States preparing for peer review of an AA-MAS by addressing the issues that were challenging for these six States in their review process and to suggest some emerging promising practices to consider when developing an AA-MAS. Representatives from the six States were invited to receive feedback from the peers reviewing their AA-MAS submissions and to provide comment on the problems related to satisfying the requirements. The content of this paper is based on a day-long discussion among the six States, several peer reviewers, and U.S. Department of Education staff.

Background

On April 9, 2007, an additional option for an alternate assessment of students with disabilities was defined in Title I and IDEA regulations. This regulation permits States to develop modified academic achievement standards based upon grade-level content standards. “Modified achievement standards are intended for a small group of students whose disability has prevented them from achieving grade-level proficiency and who likely will not reach grade-level achievement in the same timeframe as other students” (USED, 2007, p12). The number of students for whom modified achievement standards are appropriate is expected to be small. Proficient scores from an alternate assessment based on modified achievement standards (AA-MAS) may be used to calculate adequate yearly progress as long as the number does not exceed 2 percent of the total student population in a given grade and subject area at the district or State level. Although the AA-MAS is optional, it provides an opportunity for States to conceptualize and create a framework for teaching, learning, and assessment that supports high expectations for all students with disabilities while providing educators and parents with a deeper understanding of how these students demonstrate their knowledge.

Lessons Learned

The initial peer review of the AA-MAS revealed that the States had not yet met all the peer review requirements and that States shared common issues. Most of the States that participated in the initial review had previously implemented an assessment intended to be consistent with the proposed AA-MAS for a group of students with disabilities, but that assessment required some revision in response to the April 2007 regulation and guidance. Because these States actually had less than a year to make changes and address all of the requirements of peer review, it is not surprising that some aspects of peer review were challenging. The States shared a need for a greater depth of understanding in two major areas. The first was related to the additional State responsibilities associated with implementation of AA-MAS which include the development and monitoring of the implementation of two sets of

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guidelines: state-defined guidelines for eligibility to ensure that the appropriate students are identified, as well as guidelines for development of standards-based IEPs. The second area was focused on test design issues, particularly the manner in which the AA-MAS test design must address the grade-level content standards and the importance of performance level descriptors.

This paper is organized by topics within the two major areas, but to help readers link the information to peer review requirements the headers in each discussion section also refer to relevant sections in the Standards and Assessment Peer Review Guidance: Information and Examples for Meeting Requirements of the No Child Left Behind Act of 2001, Revised December 21, 2007 to include modified academic achievement standards.

**State Guidelines for IEP Teams**

As part of implementing an AA-MAS, the State is required to provide several specific supports for IEP Teams. In addition to disseminating specific information about the AA-MAS, the State must also implement and monitor two sets of guidelines. The first deals with student eligibility for the AA-MAS. The second is intended to ensure that the student’s IEP provides for instruction based on the grade-level content standards. Some required components may already exist as part of current special education structures, particularly in those States that have adopted standards-based IEPs for all students with disabilities. Components not yet developed can be created through collaboration between the State assessment and special education offices.

Areas of confusion identified by States:

- The identification of the appropriate student population for the AA-MAS.
- The criteria to support IEP Teams in making appropriate participation decisions.
- The relationship between the AA-MAS assessment, the general assessment and the alternate assessment based on alternate achievement standards (AA-AAS).
- The implementation and monitoring of guidelines regarding standards-based IEPs

*The identification of the appropriate student population for the AA-MAS*

(Peer Review Guidance Section 6: Inclusion)

**Discussion.** The Department’s Non-regulatory Guidance (2007b) indicates that students identified for the AA-MAS are those with disabilities that have precluded them from achieving grade-level proficiency within the IEP year, even with the appropriate special education supports and services. To date, little empirical research exists to define who the most appropriate students are for the AA-MAS or how their learning and performance abilities differ from students performing successfully on the general assessment. Yet understanding how the cognitive processing of learners with disabilities within the different domains assessed through the AA-MAS differ from those students tested through the general or AA-AAS is essential to inform test development decisions.

Some States in the initial peer review had targeted students who were scoring at the top of the scale on the AA-AAS while others identified the population as those students who struggled on the general assessment. Regardless of the group of students that the State chooses

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to target, the initial challenge for each State will be documenting the learning characteristics of
the students eligible to participate in the AA-MAS and using this information as the basis for test
development.

_Considerations and Promising Practices_. States should collect and analyze data to better
understand the students with disabilities who perform at low levels on the general assessment yet
do not meet eligibility criteria for the AA-AAS, including their performance across years. In
addition, performance results should be disaggregated by disability category, content, grade-
level, and accommodation use to determine any patterns that exist in the subpopulations and to
check that students are being provided with accommodations as appropriate.

Several States have used previous assessment results to examine the test performance of
students with IEPs across years. In studies conducted by Colorado and Georgia, both States
found that not all students with the lowest scores on the general assessment were students with
disabilities (See NCEO Fact Sheet, Appendix A). The Colorado study also found that most of
the students with low scores were also highly mobile, indicating potential gaps in grade-level
instruction; in addition, some students with disabilities were not receiving needed
accommodations during the test administration. (See Colorado study, Appendix B) A State
needs to distinguish between poor performance due to mobility-related instructional gaps and
poor performance due to a disability--since it's their disability-related deficits and not their
mobility-related deficits that make students with disabilities eligible for the AA-MAS.

To document evidence about the learners most appropriate for the AA-MAS, States might
consider the following:

- Analysis of the current and historical performance of students with disabilities on State
tests.
- Consideration of other indicators that may be associated with performance such as
mobility, accommodation use, and prior instruction in the content area.
- Procedures to gather in-depth qualitative and quantitative information about students’
instruction in and learning of the grade-level curriculum to better understand the
relationship between disability and inability to progress in the grade-curriculum.
- Procedures to confirm that the specialized instruction indicated in the IEP is appropriate
and results in student learning of the grade-level curriculum.

_The criteria to support IEP Teams in making appropriate participation decisions_
(Peer Review Guidance Section 6: Inclusion)

_Discussion_. States must develop criteria for IEP teams to use when determining the
students most appropriate for the AA-MAS. The State must also monitor implementation of the
eligibility criteria. The States initially reviewed did not submit evidence of State monitoring
activities designed to ensure that the identification process had been followed properly.

Assuming that IEP Teams have received clear eligibility guidelines for determining
which students should be assigned to the AA-MAS in a particular content area, the State must
also have a procedure to monitor that the guidelines are followed with fidelity. This is an
important student safeguard. The State must determine how the monitoring will occur and which
office will be responsible. Table 1 below suggests the type of evidence that States may submit to

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satisfy the requirement for Peer Review. In response to State questions, the Department has also drafted a chart that suggests the types of evidence that might be submitted for peer review as documentation of the monitoring process. (See Appendix C: State Guidelines for MAS)

Table 1: State responsibilities for IEP team guidelines

<table>
<thead>
<tr>
<th>Criteria for IEP Teams to use in determining which students are eligible</th>
<th>Possible Evidence</th>
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| The student’s disability has precluded the student from achieving grade-level proficiency as demonstrated by objective evidence of the student’s academic performance (6.2.3a) | • An IEP form that specifies how disability impacts ability to learn in a particular content area  
• State training materials that define “objective evidence”  
• List of State-recommended assessments that may be used for this purpose and/or cautions regarding inappropriate measures of academic performance  
• State monitoring might include annual examination of the numbers of students assigned to the AA-MAS with possible intervention if LEA data showed disproportionate identification or sudden changes in patterns of results without rationale |
| The student’s progress to date in response to appropriate instruction, including special education and related services designed to address the students individual needs, is such that, even if significant growth occurs, the IEP team is reasonably certain that the student will not achieve grade-level proficiency within the year covered by the student’s IEP. (6.2.3a) | • State AA-MAS manuals caution that if a student scored “advanced” on the AA-MAS in the prior year, the IEP team should consider placement in the general test  
• IEP team training materials include strategies for evaluating “appropriate instruction” e.g. examination of prior year’s IEPs, interview of previous teacher or parent |
| The determination of the student’s progress must be based on multiple measurements, over a period of time, that are valid for the subjects being assessed. | • Training materials provided to IEP Teams that include recommendations for appropriate data collection  
• State monitoring might include an audit of IEPs with special attention to the data used to document student progress over time. |

The IEP should include sufficient documentation from multiple achievement assessments over time to justify decisions based on a student’s lack of progress toward grade-level achievement standards, including multiple valid, reliable, and objective data that are robust enough to support the IEP decisions. The data sources should include but not be limited to:
- State assessments (Title I and other State required tests, such as end of course assessments)
- District-wide assessments (e.g. interim benchmark assessments)
- Classroom and formative tests (e.g. curriculum-based measures, diagnostic tests, common assessments, etc.)

**Considerations and Promising Practices.** Many State Special Education Departments have developed and are currently disseminating information to districts about the IDEA requirements and State guidelines for determining a specific learning disability (SLD) using a Response to Intervention (RTI) process. SLD guidelines must be based on a data-driven decision making process.

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process, including the use of progress monitoring of student gains in response to instruction and special education interventions. Consideration of how these existing procedures could be applied to the AA-MAS provides an opportunity for the State’s assessment and special education units to collaborate and to make intentional connections.

**The relationship between the AA-MAS assessment, the general assessment, and AA-AAS**

(Peer Review Guidance Section 6: Inclusion)

**Discussion.** To support the IEP teams’ decision-making procedures, the State is required to provide “a clear explanation of the differences between the assessments based on grade-level academic achievement standards and those based on modified or alternate academic achievement standards, including any effects of State and local policies” resulting from participation in an alternate assessment based on alternate or modified achievement standards (34 CFR 200.1).

Few States submitted a description of the relationship between the three assessments for peer review. States varied in their rationale for the development of the AA-MAS, as did their approach to the assessment structure. A coherent assessment system is necessary to ensure that every student receives instruction linked to the grade-level standards based on their unique learning characteristics, that student achievement is adequately measured, and that all students are included in accountability systems. It is crucial for States to consider how learning differs across students and how the various assessments within the current system tap both content knowledge and process skills with respect to the grade-level standards in order to effectively assign students to the most appropriate assessments. States will need to articulate the interrelationship among all three of these assessments so that IEP Teams understand the similarities and differences (See sample comparison tables, Appendix D and E).

**Considerations and Promising Practices.** Based on the Department’s Non-regulatory Guidance (USED, 2007b) and best practice in assessment system design and development, there are several important steps that States might consider as they conceptualize and design the AA-MAS to ensure coherence with the State’s assessment architecture and to build the argument for validity.

1. Define a clear purpose for developing modified achievement standards and assessments.
2. Describe how the grade specific content and processes are covered at each grade level within each assessment.
3. Explain how the curricular expectations are the same or different for students taking the general assessment, AA-MAS, and AA-AAS.
4. Clarify participation options (e.g. students may take the AA-MAS in one content area and the general assessment in another)
5. Specify how the test format and administration procedures will differ for each assessment.
6. Identify the population of students eligible for each assessment and the characteristics that are unique to each group.
7. Describe how teaching and learning will be improved as a result of participation in the AA-MAS.

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The implementation and monitoring of guidelines regarding standards-based IEPs
(Peer Review Guidance Section 6: Inclusion)

Discussion. For the initial peer review most States were not able to provide guidelines to support IEP teams to apply in developing IEPs that include “goals that are based on the academic content standards for the grade in which a student is enrolled” (USED, 2007a). The States reviewed also lacked documentation of monitoring procedures to ensure that IEPs were standards-based. The purpose of this requirement is to ensure that a student receives instruction directed toward their attainment of the grade-level curriculum. Table 2 lists the State responsibilities with examples of evidence that may be submitted for Peer Review.

Table 2: State requirements for guidelines for development and use of standards-based IEPs.

<table>
<thead>
<tr>
<th>Guidelines for IEP Team</th>
<th>Possible Evidence</th>
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| The State has established and monitors implementation of clear and appropriate guidelines for developing IEPs that include goals based on content standards for the grade in which a student is enrolled (6.2.3c) | • State’s plan for monitoring implementation may include annual audit of a sample of IEPs at several grade levels  
• The State looks for differential patterns across content areas tested and adjusts annual training to support IEP development as needed |
| The State ensures that students assessed an AA-MAS have access to the curriculum, including instruction, for the grade in which the students are enrolled. (6.2.3d) | • The State has developed observable indicators that are used in year-end interviews of teachers and parents of selected students |
| The State ensures that students who take an AA-MAS are not precluded from attempting State diploma requirements (6.2.3e) | • State plan for monitoring includes use of indicators such as policy statements, data analysis, course requirements, training materials |
| The student’s IEP goals for subjects assessed by the Statewide system are based on the academic content standards for the grade in which the student is enrolled. (6.2.3.a) | • Training materials provided to IEP Teams that include expectation and explanation for developing IEP goals based on academic content standards for the grade in which the student is enrolled.  
• A process for State review of IEPs to confirm that student’s instructional goals reflect grade-level content standards.  
• Follow-up procedures when IEPs do not indicate a focus on the academic content standards for the student’s grade level. |
| Statement that the IEP Team must review individual assessment decisions annually (6.2.3.f) | • IEP form includes statement that IEP Team must make assessment decisions annually.  
• Training materials provided to IEP Teams explain how to use data and multiple measurements to determine appropriate assessment. |

Considerations and Promising Practices. Rather than focus on all standards, a standards-based IEP is intended to address only those grade-level standards for which a student will need specialized instruction and supports to progress in the general curriculum. Training for IEP Teams should include a process for helping them prioritize the grade-level standards most relevant for a student’s abilities and needs. Considerations should include but are not limited to the following:

- Proficiencies related to the grade-level standards
- Results from academic achievement measures administered throughout the year

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Specialized instruction that a student needs to gain access to the curriculum
Evaluation methods to monitor student progress across the year
Assessment participation decisions

States should also monitor that assessment participation decisions are revisited annually and changed in the event that the student makes gains as indicated by performance on the AA-MAS and other measures within the body of evidence. Appendix F offers a seven step process for the development of a standards-driven IEP. To help IEP Teams better understand access to the general education curriculum, States might also consider developing and monitoring observable indicators that define instruction in grade-level standards and appropriate instructional services.

Test Design Issues

For most of the States participating in the initial peer review, the reviewers identified concerns that are addressed in three sections of the Peer Review Guidance: Alignment, technical quality and academic achievement standards. The issue of alignment was by far the most common area of difficulty. The challenge of developing an assessment that includes the same grade-level content standards as the general assessment but is designed to reflect a different level or degree of understanding of the content drove much of the conversation about the AA-MAS.

Areas of confusion identified by States:
- The requirement that the AA-MAS be based on the same content standards as the general assessment
- How to maintain alignment with the grade-level content standards while reducing the cognitive complexity of the AA-MAS
- What aspects of the test development process must be documented for peer review
- Role of the performance-level descriptors (PLDS) in clarifying the relation of the AA-MAS with the general assessment

The requirement that the AA-MAS be based on the same content standards as the general assessment
(Peer Review Guidance Section 5: Alignment)

Discussion. Alignment with grade-level content standards must be the platform for the development of modified achievement standards. The Department’s Non-regulatory Guidance (2007b) states:

“This assessment is based on modified academic achievement standards that cover the same grade-level content as the general assessment. The expectations of content mastery are modified, not the grade-level content standards themselves. The requirement that modified academic achievement standards be aligned with grade-level content standards is important; in order for these students to have an opportunity to achieve at grade level, they must have access to and instruction in grade-level content” (p.3)

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While the AA-AAS may represent simplified, less extensive grade-level content linkage, the alignment of the AA-MAS must mirror the full range of content standards evident on the general assessment. The AA-MAS differs from the general assessment in that the proficiency performance demands will be less difficult or complex. Since the AA-MAS must represent alignment with the same grade-level content standards and objectives as the general assessment, students are expected to have access to instruction in grade-level content to work toward grade-level achievement as required through IDEA.

Alignment between the AA-MAS and grade-level content standards should be evident in test blueprints. Some States created blueprints based on extensions of the grade-level standards while others reduced the number of standards to be assessed based upon a prioritization process. Since students taking the AA-MAS should be provided with an intended and taught curriculum based on grade-level content, test blueprints should reflect the same emphasis and patterns as the general assessment, although less difficult items may be used to represent the standards. Other States attempted to follow the same blueprint specifications for both the general and AA-MAS but used fewer items on the AA-MAS. While this approach is acceptable, test reliability may be compromised; therefore, States should provide a defensible argument to address why students taking the AA-MAS would need a shorter assessment and provide evidence that the test reliability is acceptable.

**Considerations and Promising Practices.** Cross grade-level content experts knowledgeable about how conceptual understanding and skills are developed in the academic subject should be included in each facet of the test design. In addition, special educators with pedagogical grounding in cognitive processing and who teach students eligible for the AA-MAS should be represented in the test design process.

**How to maintain alignment with the grade-level content standards while reducing the cognitive complexity of the AA-MAS**
( Peer Review Guidance Section 4: Technical Quality)

**Discussion.** States used different methods to deal with the cognitive complexity issue. These included manipulating items to change the interaction between content and process, maintaining the same depth of knowledge (DOK) with less text, decreasing the DOK and maintaining more abstract text, or providing embedded supports or scaffolding within the test items. Other States reported selecting items from the general assessment item bank, but only those items that were the least difficult for the general population.

States asked for clarification of the difference between DOK and difficulty. Generally, depth of knowledge is a term used to indicate the cognitive complexity of an item. Webb (1999) describes four levels of DOK:

1. **Recall:** Requires the recall of a fact, information, or procedure.
2. **Skill/Concept:** Requires the use of information, conceptual knowledge, procedures, two or more steps, etc.
3. **Strategic Thinking:** Requires reasoning, developing a plan or sequence of steps; has some complexity; more than one possible answer

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4. **Extended Thinking:** Requires an investigation; time to think and process multiple conditions of the problem or task; and more than 10 minutes to do non-routine manipulations.

Difficulty refers to how easy or challenging test items were for students to answer. The level of item difficulty is determined by the p-value, or more simply, the percent of students that answer an item correctly.

A few States have initiated or completed studies to determine how changes in item format affect difficulty and discrimination for students with and without disabilities. Other States have investigated the patterns of item performance of students with disabilities on the general assessment with specific attention to students scoring two standard deviations or more from the mean. These types of exploratory studies are helpful to understand how students approach items of varied cognitive complexity. The studies to date have not indicated types of item variations that produce consistently beneficial results for students eligible for the AA-MAS. (See studies from the Rhode Island Enhanced Assessment grant project listed in Appendix G)

Most States are approaching design of the AA-MAS by selecting items that appear to be less difficult for students with disabilities; altering items by simplifying language; decreasing the number of distractors; adding graphics; and/or including fewer items on the assessment (Lazarus, Thurlow, Christensen, & Cormier, 2007). Some states are also decreasing text density and arranging text format to help students key in on salient information in the reading passage. (See Kansas KAMM item specifications, Appendix H). Only limited information exists regarding how these item formats change the level of difficulty or cognitive load for students with disabilities.

**Considerations and Promising Practices.** Cognitive labs, using think-aloud strategies, are a practice that has the potential to help test developers understand the tactics student draw upon when presented with problems such as mathematical calculations or interpreting text. While cognitive labs have been an effective tool for identifying contextual issues with items, several States are now using the think-aloud process to better understand the problem-solving mechanisms used by the population of students eligible for the AA-MAS. Johnstone, Bottsford-Miller, and Thompson (2006) suggest that the think-aloud process is best when adapted for students who may be more concrete in their language and thought processes. Rather than discussing their thinking as they read the prompt and distractors and decide how to solve the problem, students are more apt to respond and demonstrate their cognitive processing when asked to guide others in solving the task (Johnstone, et.al. (2006).

A number of students with disabilities have speech/language concerns, so it may be important to investigate the impact of the linguistic structure of items. In a study of the linguistic challenges in items using the cognitive lab approach, Johnstone, Liu, Altman, and Thurlow (2007) found that items containing pronouns, complex verbs, and irrelevant language, including undefined, non-construct vocabulary in item stems; challenging non-construct vocabulary in item response choices; and words with negative prefixes may complicate text for students with disabilities.

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Item scaffolding is another strategy with promise. Scaffolding is intended to lift out and call attention to the key requirements of an item so that students can clearly see what it expected of them (AIR, 2000). This method is not intended to simplify the item by leading students to the answer as in classroom instruction. Rather scaffolding can make the performance expectations more explicit for students, potentially removing some of the irrelevant variance associated with response confusion. Figure 1 provides an example of scaffolding for a math item.

Figure 1. Example of a scaffolded item

**Example:** John drew a four-sided closed figure with four parallel sides and four right angles. Draw a similar figure and label your drawing to show the parallel sides and the right angles.

*Remember, to get full credit you must:*

1. *Draw a four-sided closed figure with four parallel sides and four right angles,* and
2. *Label the drawing to show the parallel sides and right angles.*


**What aspects of the test development process must be documented for peer review?**
(Peer Review Guidance Section 4: Technical Quality)

**Discussion.** For peer review, the complete test development process must be documented in response to the questions in the Peer Review Guidance. This will require evidence such as the test blueprint, item specifications and item selection procedures, a full description of the standard setting procedures including final performance level descriptors and recommended cut points, results of statistical analyses that document test validity and reliability, and sample reports. Peer reviewers asked whether traditional test statistics, such as reliability coefficients, must be the same for the AA-MAS as for the general test because many of the States reviewed elected to create AA-MAS with fewer items than the general test. In general, the peer review process requires the State to define acceptable values for technical parameters and if those values are not met to explain the actions it will take to improve the technical quality of the test.

In addition, the standard-setting for the AA-MAS must occur independent of the general assessment with specific cutpoints established for identified performance categories. Documentation of the standard-setting process should include a full description of the procedures employed and the qualifications of the panelists. Results of studies of classification accuracy, completed after the operational form of the test has been administered, should also be provided as evidence of technical quality.

**Considerations and Promising Practices.** When conceptualizing an approach to the AA-MAS, States may want to review the current approaches other States are taking with regard to the development of the AA-MAS as well as the technical considerations of the design (See Note: The content in this paper is based on current facts and research available. As more information related to the AA-MAS becomes available, the considerations and emerging best practices will need to be update.)
Appendix I, States’ assessments and Appendix J, technical design and documentation). Piloting of items across different student populations, including students without disabilities and AA-MAS eligible and non-eligible students with IEPs, is suggested to conduct a comprehensive item analysis.

Once the operational form of the assessment is developed and the test has been administered, the State should begin to collect and analyze information related to the intended and unintended consequences of including the AA-MAS in the State assessment structure. Therefore, States should begin early to plan for consequential studies founded on the States' supposition of the expected impact to the learning and teaching. Baseline data collected in the first year of implementation will be essential for evaluating consequences.

Role of the performance level descriptors (PLDS) in clarifying the relation of the AA-MAS with general assessment
(Peer Review Guidance Sections 2 and 4: Achievement Standards and Technical Quality)

Discussion. One of the important lessons learned from the initial review of AA-MAS was the critical role of the performance level descriptors (PLDs) in understanding both the similarities and differences between the AA-MAS and the general test. Several of the States reviewed used the same labels for achievement levels for both tests; only the PLDs made clear how achievement expectations differed. Another State treats the AA-MAS as a sort of downward extension of the general assessment and although both the AA-MAS and the general assessment include a performance level named “Basic” it was clear that the expectations and student consequences are not the same for students at the basic level on these two tests.

PLDs are intended to distinguish performance associated with each performance level defined for an assessment. Lewis and Haug (2005) suggest that the descriptors for achievement levels should be developed across grades at the same time and then assessments at each grade designed with those definitions as design specifications. In addition to cross-grade progression of skills, PLDs should also build logically across performance categories; that is, skills associated with the “proficient” level should include more complex skills than those at the “basic” level (Perie, Hess, & Gong, 2008).

Well-crafted PLDs can play an important role in test design. Assessment designs should begin with conversations about expected skill demonstrations for proficiency and subsequent development of performance level descriptors (Bejar, 2007). Then, test specifications should include item development and selection procedures that provide for differentiated performances consistent with the expected proficiency levels. Inherent in this process is the assumption that the range and categorical concurrence of grade-level standards covered within the general assessment will be addressed in the AA-MAS. Attention to match between content and cognitive processes of the assessment to the standards is necessary to alignment (AERA, 2000) and is required to satisfy the Peer Review process.

Considerations and Promising Practices. PLDs are intended to discriminate the skills and abilities represented by the different performance categories associated with an assessment. As with the general assessment, the AA-MAS PLDs should differentiate the level of skill.

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difficulty and/or complexity across categories and grades. (See Appendix K and L, performance descriptor development).

When developing PLDs for the AA-MAS, States may find it useful to have vertical grade-level teams of content and special education experts review the PLDs for alignment as well as articulation in the progression of content complexity and performance across grade levels. Also, States should document the appropriateness of the PLDs with validity studies such as longitudinal analysis of student performance and agreement with additional qualitative and quantitative sources of achievement, including classroom performance and content measures based on grade-level material.

**Conclusion**

The development of the AA-MAS is evolving. Several States are striving to create an integrated system of content standards, modified achievement standards and instructional supports, and promising practices are emerging from the field. States must also be familiar with and plan for the regulatory requirements as they begin to conceptualize assessment development. By combining best practices based on our understanding of the students and their learning needs with technically sound assessment practices and high expectations, all students with disabilities can be assessed in the most appropriate and valid manner.
References


Marion, S. (2007). A technical design and documentation workbook for assessments based on modified achievement standards working draft, Minneapolis, MN, National Center for Educational Outcomes, University of Minnesota.


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Appendices

The documents that follow are offered as materials that may help States in the development of an AA-MAS. States are not required to adopt any of these materials. Indeed, it is hoped that these documents will serve as a springboard for the creation and sharing of a wide variety of exemplars. States interested in developing an AA-MAS should be aware of the earlier work completed and improve on the methods and analyses of previous research efforts.

Short documents are included in their entirety. Longer documents may be obtained electronically as indicated.

Materials related to Implementation and Monitoring of State Guidelines

Appendix A: Identifying Students with Disabilities Who are Eligible to Take an Alternate Assessment Based on Modified Achievement Standards, NCEO Fact Sheet (2007). This Q & A provides an overview of requirements for the AA-MAS. Available at: http://cehd.umn.edu/NCEO/Teleconferences/AAMASTeleconferences/AAMASIdentifying%20Students.pdf


Note: The content in this paper is based on current facts and research available. As more information related to the AA-MAS becomes available, the considerations and emerging best practices will need to be update.
Materials related to development and peer review of AA-MAS

Appendix G: Rhode Island Enhanced Assessment Grant. This project completed multiple studies including one that evaluated item modifications and one that offered students a choice of item formats. Available at www.necompact.org

Appendix H: Kansas State Item Specifications, WestEd (2007). Lists the item specifications and an example used by Kansas for the 8th grade reading KAMM.


Appendix J: A Technical Design and Documentation Workbook for Assessments Based on Modified Achievement Standards, Marion (2007). A workbook intended to help States work through the design and documentation considerations associated with the implementation of an alternate assessment based on modified achievement standards. Available at: http://cehd.umn.edu/nceo/Teleconferences/AAMASworkbook.pdf

Appendix K: Writing Performance Level Descriptors: Lessons Learned from the General Assessment to Alternate Assessments Based on Alternate and Modified Achievement Standards, Perie, Hess, & Gong (2008). Provides comparisons of the general assessment PLDs and PLDs based on modified achievement standards. Available at: http://www.nciea.org/publications/ALDs_BGKHAMAP08.pdf


Note: The content in this paper is based on current facts and research available. As more information related to the AA-MAS becomes available, the considerations and emerging best practices will need to be update.
Appendix A

Identifying Students with Disabilities Who are Eligible to Take an Alternate Assessment Based on Modified Achievement Standards,
Fact Sheet

Identifying Students with Disabilities who are Eligible to Take an Alternate Assessment Based on Modified Academic Achievement Standards

States have the option of providing an alternate assessment based on modified academic achievement standards for students with disabilities. States considering this option need to think about who the students are who might take an alternate assessment based on modified academic achievement standards, how these students access grade-level content, and how they show what they know. There must be high expectations for all students, including students assessed based on modified academic achievement standards. All students, including students who are potential candidates to take this assessment, must have access to and instruction in the general curriculum that is aligned to grade-level content standards. As States work to develop participation criteria for this assessment, they need to consider instructional issues, assessment options and choices, and the implications for student learning. The following questions and answers will help States refine their understanding of the requirements for modified academic achievement standards.

1. Who are the special education students likely to be identified to take an alternate assessment based on modified academic achievement standards?

The students may have a disability in any of the 13 disability categories defined in the Individuals with Disabilities Education Act (IDEA). The students who participate in assessments under this option are not limited to those who are close to achieving at grade level or who are relatively far from achieving at grade level. It is up to States to decide who the students are and the criteria that will be used to identify them. Alternate assessments based on modified academic achievement standards may be an appropriate option for students whose progress to date, in response to appropriate instruction in the grade level curriculum, makes it unlikely they will achieve grade-level proficiency within the year covered by their individualized education programs (IEP).

States that choose to provide this assessment option must develop guidelines for IEP teams (see question 5) to use in making this determination. States will find it useful to examine data as they gather information to assist them in developing their guidelines. States need to carefully consider how students will be identified for this option and are encouraged to explore who the students are by examining the data in different ways. The National Center for the Improvement of Educational Assessment (NCIEA) conducted an analysis of State data to learn more about the performance of students who qualify for special education services. The results for one State are shown in the figure below. As indicated in the figure, the scores of students with disabilities are at all scale scores in the distribution and the scores of students without disabilities are also at all scale scores in the

1 This document was supported by the National Center on Educational Outcomes (NCEO) through its cooperative agreement with the U.S. Department of Education (Cooperative Agreement No. H326G050007). However, the opinions expressed herein do not necessarily reflect the position of the U.S. Department of Education and no official endorsement by the Department should be inferred. Note: There are no copyright restrictions on this document; however, please credit the source and support of federal funds when copying all or part of this material.
Colorado and Georgia studies found that not all students with the lowest scores on the Statewide assessment were students with disabilities. The Colorado study also found that some students with disabilities with low scores were not receiving needed accommodations on test day.²³⁴


### The regulatory language (April 9, 2007) for identifying students eligible for assessments based on modified academic achievement standards

Sec. 200.1(f)(1)(ii) Inform IEP teams that students eligible to be assessed based on alternate or modified academic achievement standards may be from any of the disability categories listed in the IDEA;.

Section 200.1(e)(2)(ii) (A) The student's progress to date in response to appropriate instruction, including special education and related services designed to address the student's individual needs, is such that, even if significant growth occurs, the IEP team is reasonably certain that the student will not achieve grade-level proficiency within the year covered by the student's IEP.

Preamble. The final regulations intentionally do not prescribe which students with disabilities are eligible to be assessed based on modified academic achievement standards; that is the determination of a student's IEP Team, which includes the student's parents, based on criteria developed by the State as part of the State's guidelines for IEP Teams.


⁴ See the presentation entitled “Investigating the Academic Achievement of Persistently Low Performing Students” in the session on Assessing (and Teaching) Students at Risk for Failure: A Partnership for Success at the Council of Chief State School Officers Large Scale Assessment Conference, Nashville TN, June 17-20, 2007. Available at: http://www.ccsso.org/content/PDFs/12%2DMelissa%20Fincher%20Paul%20Ban%20Pam%20Rogers%20Rachel%20Quenemoen.pdf.
2. What kind of evidence must be used to identify students eligible to take an alternate assessment based on modified academic achievement standards?

Objective and valid data must be used to identify students eligible to take an alternate assessment based on modified academic achievement standards. The determination of the student’s progress must be based on multiple measures that are valid for the subjects assessed. These measures must be given over a period of time. Multiple measures used for identification may include, but are not limited to, assessment data used in establishing eligibility for services under IDEA, progress monitoring data (growth trajectories), State assessments, district-wide assessments, and curriculum-based measures. In addition to the measures listed above, other assessments that can validly document academic achievement also can be used as data for student identification purposes.

According to the non-regulatory guidance from the Office of Elementary and Secondary Education (OESE), “There is no set length of time during which the data must be gathered, but there must be enough time to document the progress (or lack of progress) in response to appropriate instruction. A student’s performance on one State Title I assessment, for example, would not be sufficient documentation to show progress or lack of progress. The key is that there is sufficient data for an IEP Team to be reasonably certain that, even if significant growth occurs, the student will not achieve grade-level proficiency within the year covered by the student’s IEP.”

As indicated in the report on progress monitoring in OSEP’s Toolkit on Teaching and Assessing Students with Disabilities in order to meet the higher expectations of current standards-based systems, educators need information that can be used to project how students are doing against the grade-level standards throughout the course of the year so they can determine what needs to be done to accelerate student progress toward the proficiency standards. Research suggests that curriculum-based measurement (CBM) may provide useful information about student achievement. Progress monitoring techniques can also provide that information. However, the report on progress monitoring in the OSEP toolkit cautions:

While progress monitoring holds much promise for improved outcomes and higher expectations, there are contextual challenges that must be addressed. The challenges that are tied to the progress of students with disabilities that affect the implementation of effective progress monitoring include historical limited access to challenging curriculum, instruction, and assessment; concerns about the target of measurement, that is, whether only basic skills or a full range of rich and challenging content should be

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6 Refer to the OSEP Tool Kit on Teaching and Assessing Students with Disabilities for additional information (http://www.osepideasthatwork.org/toolkit/index.asp).
measured; and limited use of data for effective provision of instructional strategies, interventions, and supports.9

The regulatory language (April 9, 2007) for identifying students eligible for assessments based on modified academic achievement standards

Sec. 200.1(e)(2) In the guidelines that a State establishes under paragraph (f)(1) of this section, the State must include criteria for IEP teams to use in determining which students with disabilities are eligible to be assessed based on modified academic achievement standards. Those criteria must include, but are not limited to, each of the following:
(i) The student’s disability has precluded the student from achieving grade-level proficiency, as demonstrated by such objective evidence as the student’s performance on—
(A) The State’s assessments described in § 200.2; or
(B) Other assessments that can validly document academic achievement.
(ii)(A) The student’s progress to date in response to appropriate instruction, including special education and related services designed to address the student’s individual needs, is such that, even if significant growth occurs, the IEP team is reasonably certain that the student will not achieve grade-level proficiency within the year covered by the student’s IEP.
(B) The determination of the student’s progress must be based on multiple measurements, over a period of time, that are valid for the subjects being assessed.
(iii) If the student’s IEP includes goals for a subject assessed under § 200.2, those goals must be based on the academic content standards for the grade in which the student is enrolled, consistent with paragraph (f)(2) of this section.

Preamble. Section 200.1(e)(2)(ii)(B) does not require States to use response to intervention procedures or measures that must be used to determine a student’s progress over time. We believe that IEP teams should have as much flexibility as possible to use objective data to determine whether a student is eligible for an alternate assessment based on modified academic achievement standards.

3. What is a State’s responsibility to provide guidance to IEP teams in identifying students who can participate in an alternate assessment based on modified academic achievement standards?

States that choose to have an alternate assessment based on modified academic achievement standards need to develop a decision-making process and criteria that can be used by IEP teams to identify students who would be appropriately assessed based on modified academic achievement standards. The State must establish and monitor the implementation of clear and appropriate guidelines for IEP teams to apply in determining which students should participate in this assessment.

An IEP team must decide which assessment option is the most appropriate for the student. States may want to consider developing a decision tree that includes criteria for identifying students who may qualify to participate in an alternate assessment based on modified academic achievement standards.10 States have the option of developing an alternate assessment based on modified academic achievement standards for specific grades and specific content areas. Some of the questions States may want to consider including in a decision tree are:
- Does the student’s IEP include goals that are aligned to grade-level content standards?
- Have multiple, valid measures given over a period of time indicated that the student is unlikely to achieve at grade level within the year covered by the student’s IEP?

10 Several states have developed decision trees. See, for example, Kansas (http://www.kansped.org/kds/assmnts/kamm/Eligibility.pdf) and Oklahoma (http://title3.sde.state.ok.us/studentassessment/06-07/AltAssessFlwct112706.pdf).
The regulatory language (April 9, 2007) for identifying students eligible for assessments based on modified academic achievement standards

Sec. 200.1(f) State guidelines. If a State defines alternate or modified academic achievement standards under paragraph (d) or (e) of this section, the State must do the following--

(1) For students who are assessed based on either alternate or modified academic achievement standards, the State must--

   (i) Establish and monitor implementation of clear and appropriate guidelines for IEP teams to apply in determining--


   (A) Students with the most significant cognitive disabilities who will be assessed based on alternate academic achievement standards; and

   (B) Students with disabilities who meet the criteria in paragraph (e)(2) of this section who will be assessed based on modified academic achievement standards. These students may be assessed based on modified academic achievement standards in one or more subjects for which assessments are administered under Sec. 200.2;

   (ii) Inform IEP teams that students eligible to be assessed based on alternate or modified academic achievement standards may be from any of the disability categories listed in the IDEA;

   (iii) Provide to IEP teams a clear explanation of the differences between assessments based on grade-level academic achievement standards and those based on modified or alternate academic achievement standards, including any effects of State and local policies on the student's education resulting from taking an alternate assessment based on alternate or modified academic achievement standards (such as whether only satisfactory performance on a regular assessment would qualify a student for a regular high school diploma); and

   (iv) Ensure that parents of students selected to be assessed based on alternate or modified academic achievement standards under the State's guidelines in this paragraph are informed that their child's achievement will be measured based on alternate or modified academic achievement standards.

(2) For students who are assessed based on modified academic achievement standards, the State must--

   (i) Inform IEP teams that a student may be assessed based on modified academic achievement standards in one or more subjects for which assessments are administered under Sec. 200.2;

   (ii) Establish and monitor implementation of clear and appropriate guidelines for IEP teams to apply in developing and implementing IEPs for students who are assessed based on modified academic achievement standards. These students' IEPs must--


   (A) Include IEP goals that are based on the academic content standards for the grade in which a student is enrolled; and

   (B) Be designed to monitor a student's progress in achieving the student's standards-based goals;

   (iii) Ensure that students who are assessed based on modified academic achievement standards have access to the curriculum, including instruction, for the grade in which the students are enrolled;

   (iv) Ensure that students who take alternate assessments based on modified academic achievement standards are not precluded from attempting to complete the requirements, as defined by the State, for a regular high school diploma; and

   (v) Ensure that each IEP team reviews annually for each subject, according to the criteria in paragraph (e)(2) of this section, its decision to assess a student based on modified academic achievement standards to ensure that those standards remain appropriate.

Sec. 200.1(e)(2) In the guidelines that a State establishes under paragraph (f)(1) of this section, the State must include criteria for IEP teams to use in determining which students with disabilities are eligible to be assessed based on modified academic achievement standards. Those Criteria must include, but are not limited to, each of the following:

   (i) The student's disability has precluded the student from achieving grade-level proficiency, as demonstrated by such objective evidence as the student's performance on--


   (A) The State's assessments described in Sec. 200.2; or

   (B) Other assessments that can validly document academic achievement.

   (ii)(A) The student's progress to date in response to appropriate instruction, including special education and related services designed to address the student's individual needs, is such that, even if significant growth occurs, the IEP team is reasonably certain that the student will not achieve grade-level proficiency within the year covered by the student's IEP.

   (B) The determination of the student's progress must be based on multiple measurements, over a period of time, that are valid for the subjects being assessed.
4. What is the teacher’s role in identifying students eligible to take an alternate assessment based on modified academic achievement standards?

Students need access to instruction at grade level so they can work toward grade-level achievement. Teachers participate in IEP team decisions about the most appropriate assessment for a student. One of the roles a teacher may play in identifying students eligible to take an alternate assessment based on modified academic achievement standards is collecting objective and valid assessment data such as progress monitoring data, state-assessment results, district-wide assessment results, and curriculum-based classroom measurement data and structured classroom observation data. This information can then be used by the IEP team for decision-making purposes.

Teachers may also be involved in collecting response to intervention (RTI) data. Although not required for identifying students to take an assessment based on modified academic achievement standards, RTI is an approach that can be used as a screening process to identify students struggling with academic content. Evidence-based treatment approaches can then be used to accelerate the student’s performance and growth rate. The primary use of curriculum-based measurement (CBM) and other classroom and formative assessments is to provide teachers with information that can inform instruction. Teachers can use this information as they strategize ways to help students meaningfully access grade-level curriculum. The use of these data to assist in the identification of students who may participate in an assessment based on modified academic achievement standards may be a secondary use of the data.

The IEP provides the basis for student instruction by documenting goals for instruction. Teachers should use it as the starting point as they consider the instructional strategies that are needed to support student learning. Students respond to instruction that: 1) balances skills and conceptual understanding, and 2) can help the student make sense of more complex knowledge. Teachers should consider how to move students forward while building skills. Teachers may need training to learn how to look at the learning progression of students within content standards. They may also need professional development to learn how to use student work to determine what scaffolding is needed to get a student up to grade-level achievement. Teachers often need training to assist them in moving from skills lists that have historically been used to guide instruction for students with disabilities to a true standards-based curriculum that recognizes student learning progressions.

The regulatory language (April 9, 2007) for identifying students eligible for assessments based on modified academic achievement standards...
5. What must the State’s guidelines address?

If a State chooses to provide an alternate assessment based on modified academic achievement standards, the State's guidelines for IEP teams must provide IEP teams with a clear explanation of the differences between assessments based on grade-level academic achievement standards and those based on modified or alternate academic achievement standards. The guidelines must include any effects of State and local policies on the student's education resulting from taking an alternate assessment based on modified or alternate academic achievement standards (such as if taking such an assessment would have implications for whether a student could receive a regular high school diploma).

State guidelines must include information that will ensure that parents of students assessed based on modified academic achievement standards are informed that their child's achievement will be measured against modified academic achievement standards. Parents need an understanding of academic content standards, what assessments based on modified achievement standards are, how decisions should be made for their child, and the link to instruction.16

The regulatory language (April 9, 2007) for identifying students eligible for assessments based on modified academic achievement standards

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<thead>
<tr>
<th>Sec. 200.1(f)(2)</th>
<th>For students who are assessed based on modified academic achievement standards, the State must--</th>
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<tr>
<td>(i) Inform IEP teams that a student may be assessed based on modified academic achievement standards in one or more subjects for which assessments are administered under Sec. 200.2;</td>
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| Sec. 200.1(f)(1)(iii) | Provide to IEP teams a clear explanation of the differences between assessments based on grade-level academic achievement standards and those based on modified or alternate academic achievement standards, including any effects of State and local policies on the student's education resulting from taking an alternate assessment based on alternate or modified academic achievement standards (such as whether only satisfactory performance on a general assessment would qualify a student for a regular high school diploma); |

| Sec. 200.1(f)(1) (iv) | Ensure that parents of students selected to be assessed based on alternate or modified academic achievement standards under the State's guidelines in this paragraph are informed that their child's achievement will be measured based on alternate or modified academic achievement standards. |

| Sec. 300.160(d) | Explanation to IEP Teams. A State (or in the case of a district-wide assessment, an LEA) must provide IEP Teams with a clear explanation of the differences between assessments based on grade-level Academic achievement standards and those based on modified or alternate academic achievement standards, including any effects of State or local policies on the student's education resulting from taking an alternate Assessment based on alternate or modified academic achievement standards (such as whether only satisfactory performance on a general assessment would qualify a student for a regular high school diploma). |

| Sec. 300.160 (e) | Inform parents. A State (or in the case of a district-wide assessment, an LEA) must ensure that parents of students selected to be assessed based on alternate or modified academic achievement standards are informed that their child's achievement will be measured based on alternate or modified academic achievement standards. |

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6. What is the role of the IEP team in determining a student’s eligibility for an alternate assessment based on modified academic achievement standards?

According to the non-regulatory guidance from the Office of Elementary and Secondary Education (OESE),

An IEP Team’s responsibility is unchanged by the regulations on modified academic achievement standards. A student’s IEP Team continues to determine how the student will participate in State and district-wide assessments. If a State chooses to develop modified academic achievement standards and alternate assessments based on those standards, the IEP Team will have an additional assessment to choose from when determining the most appropriate assessment for the student.17

IEP teams have flexibility to decide which objective and valid data are used to identify students to participate in this assessment.

The IEP team, after analysis of objective and valid data, must be reasonably certain that the student will not reach grade-level proficiency during the year covered by the student’s IEP. The team should consider the obstacles to learning progress that a student who may participate in this assessment option may face and how to help the student overcome them. The determination of the student’s progress must be based on multiple objective and valid measures. The measures may include other assessments that can validly document academic achievement. For example, they may include data for eligibility assessment, progress monitoring data, state assessment results, district-wide assessment results, and curriculum-based and classroom measurement results.

The regulatory language (April 9, 2007) for identifying students eligible for assessments based on modified academic achievement standards

Sec. 200.1(e)(2) In the guidelines that a State establishes under paragraph (f)(1) of this section, the State must include criteria for IEP teams to use in determining which students with disabilities are eligible to be assessed based on modified academic achievement standards. Those criteria must include, but are not limited to, each of the following:

(i) The student's disability has precluded the student from achieving grade-level proficiency, as demonstrated by such objective evidence as the student's performance on--
   (A) The State's assessments described in Sec. 200.2; or
   (B) Other assessments that can validly document academic achievement.

Sec. 200.1(e)(2) (ii)(A) The student's progress to date in response to appropriate instruction, including special education and related services designed to address the student's individual needs, is such that, even if significant growth occurs, the IEP team is reasonably certain that the student will not achieve grade-level proficiency within the year covered by the student's IEP.

   (B) The determination of the student's progress must be based on multiple measurements, over a period of time, that are valid for the subjects being assessed.

7. What must the IEP of a student identified to take an alternate assessment based on modified academic achievement standards address?

The IEP of a student assessed based on modified academic achievement standards must include goals based on academic content standards for the grade in which the student is enrolled. The goals will provide the foundation of the academic needs portion of the IEP. The IEP team can consider how a student develops competence in a domain and how students can develop competence by a variety of paths. The IEP goals must be aligned with the grade-level content standards, and the IEP team should consider what supports are needed so that the student can learn the grade-level content.

The team also needs to consider how to monitor student learning as it progresses using a variety of appropriate scientifically-based evidence. The team also should consider how to remediate or accelerate progress on basic skills while designing instruction aligned to grade-level content standards. There must be high expectations for all students, including students who will participate in an alternate assessment based on modified academic achievement standards. Students who require accommodations when participating in an alternate assessment based on modified academic achievement standards must use accommodations that produce valid scores.\(^{18}\) State guidelines regarding accommodations should be published and disseminated.\(^{19}\)

An IEP team must annually review, for each subject, the decision regarding participation of a student who participates in an alternate assessment based on modified academic achievement standards. Progress monitoring may be a useful tool in helping IEP teams annually make appropriate assessment decisions.

It is very important to remember that it is anticipated that students will—over time—make progress toward achieving at grade level. Therefore, students may move from taking an assessment based on modified academic achievement standards to taking the general assessment. One state refers to “permeability” over time in the assessments that a student takes.

The regulatory language (April 9, 2007) for identifying students eligible for assessments based on modified academic achievement standards

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<tr>
<th>Sec. 200.1(e)(2) (iii) If the student's IEP includes goals for a subject assessed under Sec. 200.2, those goals must be based on the academic content standards for the grade in which the student is enrolled, consistent with paragraph (f)(2) of this section.</th>
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<tr>
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\(^{19}\) To learn more about current state policies, use the NCEO Data Viewer at http://data.nceo.info/.
Sec. 200.6(a) (1) Appropriate accommodations. (i) A State's academic assessment system must provide--

(A) For each student with a disability, as defined under section 602(3) of the IDEA, appropriate accommodations that the student's IEP team determines are necessary to measure the academic achievement of the student relative to the State's academic content and academic achievement standards for the grade in which the student is enrolled, consistent with Sec. 200.1(b)(2), (b)(3), and (c); and

(B) For each student covered under section 504 of the Rehabilitation Act of 1973, as amended (Section 504), appropriate accommodations that the student's placement team determines are necessary to measure the academic achievement of the student relative to the State's academic content and academic achievement standards for the grade in which the student is enrolled, consistent with Sec. 200.1(b)(2), (b)(3), and (c).

(ii) A State must--

(A) Develop, disseminate information on, and promote the use of appropriate accommodations to increase the number of students with disabilities who are tested against academic achievement standards for the grade in which a student is enrolled; and

(B) Ensure that regular and special education teachers and other appropriate staff know how to administer assessments, including making appropriate use of accommodations, for students with disabilities and students covered under Section 504.

Sec. 300.160(d) Explanation to IEP Teams. A State (or in the case of a district-wide assessment, an LEA) must provide IEP Teams with a clear explanation of the differences between assessments based on grade-level academic achievement standards and those based on modified or alternate academic achievement standards, including any effects of State or local policies on the student's education resulting from taking an alternate assessment based on alternate or modified academic achievement standards (such as whether only satisfactory performance on a regular assessment would qualify a student for a regular high school diploma).

Sec. 300.160 Participation in assessments.

(a) General. A State must ensure that all children with disabilities are included in all general State and district-wide assessment programs, including assessments described under section 1111 of the ESEA, 20 U.S.C. 6311, with appropriate accommodations and alternate assessments, if necessary, as indicated in their respective IEPs.

(b) Accommodation guidelines. (1) A State (or, in the case of a district-wide assessment, the LEA) must develop guidelines for the provision of appropriate accommodations.

(2) The State's (or, in the case of a district-wide assessment, the LEA's) guidelines must--

(i) Identify only those accommodations for each assessment that do not invalidate the score; and

(ii) Instruct IEP Teams to select, for each assessment, only those accommodations that do not invalidate the score.

Sec. 200.1(f) (2)(B)(v) Ensure that each IEP team reviews annually for each subject, according to the criteria in paragraph (e)(2) of this section, its decision to assess a student based on modified academic achievement standards to ensure that those standards remain appropriate.
Resources


Office of Special Education Programs (OSEP). *OSEP Tool Kit on Teaching and Assessing Students with Disabilities.* Available at: http://www.osepideasthatwork.org/toolkit/index.asp.

APPENDIX B

HB 05-1246 Study Committee: Assessing “Students in the Gap” in Colorado
Assessing “Students in the Gap” in Colorado

Report from the HB 05-1246 Study Committee

December 31, 2005
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EXECUTIVE SUMMARY

In the Fall and Winter of 2005, a legislatively-established committee (HB 1246) convened for the purpose of evaluating Colorado’s educational assessment system for students who consistently score at the very lowest levels on the Colorado Student Assessment Program (CSAP) tests and who are not eligible to take the Colorado Student Assessment Program Alternate (CSAPA). The committee refers to this small group of Colorado students as “students in the gap”.

The committee evaluated state and national research and Colorado assessment data, and reviewed specifically designed survey data to make recommendations regarding the direction Colorado should take in order to ensure that its testing system validly assesses what “students in the gap” know in relation to Colorado State Model Content Standards.

Following its guiding principles, the committee carefully considered and ultimately rejected several proposed solutions. While the committee saw some benefit in each idea, it was determined that, on balance, there are better alternatives and/or still unexplored possibilities the state should pursue before adopting these considerations.

The committee recommends that the following proposals be adopted by Colorado’s State Board of Education. These recommendations meet most or all of the guiding principles by which the committee abided and garnered the consensus of the group for what the state should do to validly assess knowledge of the Colorado Model Content Standards for all students. With unanimity, the members of this committee make these recommendations for Colorado:

- Expand the eligibility for and the difficulty of the current CSAPA assessment;
- Increase the use of standardized accommodations;
- Provide an allowable non-standard accommodation/ modification process for the CSAP for “students in the gap” to be included for the purpose of NCLB accountability;
- Promote intensive, targeted, research-based instruction;
- Investigate accountability measures that could account for longitudinal growth;
- Investigate the effect of presenting the CSAP to students in smaller sections over a longer period of days; and
- Investigate abbreviating the CSAP.
INTRODUCTION

Federal and state laws\(^1\) require that all students, including students with disabilities, participate in statewide assessments. The inclusion of all students in statewide assessments and accountability systems is a mechanism for ensuring that all students, including those with disabilities, are provided access to the general education curriculum and are meeting the required state level standards.

In Colorado, students with disabilities are assessed through the Colorado Student Assessment Program (CSAP) or through the CSAP Alternate (CSAPA). Most students with disabilities take the CSAP tests with their general education peers, while the CSAPA is intended for a very small group of students with significant cognitive disabilities. Approximately 0.87% of students in Colorado are assessed with the CSAPA.

A particular group of students, identified for purposes of this report as “students in the gap,” may not be well served by Colorado’s current state level assessment system. The committee defines “students in the gap” as those students with Individualized Education Plans (IEPs) whose scale scores fall in the lowest one-third of the Unsatisfactory category on the CSAP tests. A small percentage of this group of students with disabilities is consistently unable to demonstrate growth toward grade level content standards through the CSAP and does not meet the current eligibility requirements of the state’s alternate test, the CSAPA. Additionally the definition of “students in the gap” includes students taking and receiving perfect scores on the CSAPA. For either group of students, the current administration of the CSAP or CSAPA may not be the best way to measure their knowledge of state content standards.

HB 05-1246 (Section 22-7-413, CRS) created a study committee in 2005 to examine and evaluate the administration of assessments for these “students in the gap”. The charge of this committee included examination of the following:

- The effects of assessments on “students in the gap”;
- The appropriateness of off-level testing;
- Accountability for state content standards;

\(^1\) Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act (ADA) of 1990, Title I of the Elementary and Secondary Education Act (ESEA), the Individuals with Disabilities Education Act (IDEA), the reauthorization of ESEA in 2001, known as No Child Left Behind (NCLB), and Section 22-7-409, Colorado Revised Statutes.
- The effect of including or excluding the scores of “students in the gap” in accountability calculations;
- Assessments for “students in the gap” in other states; and
- Legal, regulatory, and constitutional issues related to testing “students in the gap”.

Committee members included representatives from the state legislature, parents, community-based organizations, special education directors, higher education, local school district boards of education, school administrators, assessment experts, teachers, and the Colorado Department of Education. The majority of the study committee was appointed by the Colorado State Board of Education.

Members of the committee had varying degrees of background knowledge and beliefs regarding who are the “students in the gap,” how many there are, and what types of assessments best serve these students. Through the review of existing state and federal law, state and national research, Colorado assessment data, and survey data from represented groups, committee members were able to dispel or confirm their previously held ideas and beliefs.

This report outlines the determinations of the committee and provides the key information, data, and findings on “students in the gap” used by this committee to reach its recommendations. Also presented are considerations for “students in the gap” which the committee evaluated but ultimately did not recommend. Finally, this report presents recommendations for improvements to the assessment system to account for “students in the gap”.
GUIDING PRINCIPLES OF THE COMMITTEE

At the first meeting of the committee, members debated and agreed on several principles or norms to be used to frame discussion and debate, evaluate information, and ultimately make decisions about the recommendations for “students in the gap”. The committee used the following Guiding Principles:

- Make data-driven decisions;
- Keep the focus of the recommendations specific to “students in the gap”;
- Maintain high content standards and expectations for “students in the gap”;
- Focus on best practices and assessments for “students in the gap”;
- Consider the parameters of what is permitted by state and federal law; and
- Consider state and federal funding implications.
ASSESSMENTS IN COLORADO

Colorado’s current assessment system relies on two tests to measure knowledge of state model content standards for all students.

**CSAP**
The Colorado Student Assessment Program (CSAP) is administered to students in grades 3-10 in reading, writing, and math, and to students in grades 5, 8, and 10 in science. The vast majority of students in the state, including the vast majority of students with disabilities, take the CSAP tests. CSAP is a large scale assessment that relies on both multiple choice and constructed response items to evaluate student knowledge of state academic content standards. The CSAP allows for a limited number of standardized accommodations that are available for all students. Table 1 lists the accommodations and the frequency of use in 2005 CSAP Reading. As the table shows, about 10% of students were provided with and used accommodations on the 2005 CSAP Reading assessment.

![Table 1: Accommodations on the 2005 Reading CSAP, All Students](chart)

<table>
<thead>
<tr>
<th>Accommodation</th>
<th>Number</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>NONE</td>
<td>409,015</td>
<td>89.61%</td>
</tr>
<tr>
<td>EXTENDED/MODIFIED TIMING/SCHEDULING</td>
<td>31,886</td>
<td>6.99%</td>
</tr>
<tr>
<td>TEACHER-READ DIRECTIONS</td>
<td>11,168</td>
<td>2.45%</td>
</tr>
<tr>
<td>SCRIBE</td>
<td>3,594</td>
<td>0.79%</td>
</tr>
<tr>
<td>ASSISTIVE COMMUNICATION DEVICE</td>
<td>307</td>
<td>0.07%</td>
</tr>
<tr>
<td>SIGNING</td>
<td>219</td>
<td>0.05%</td>
</tr>
<tr>
<td>LARGE-PRINT VERSION</td>
<td>193</td>
<td>0.04%</td>
</tr>
<tr>
<td>BRAILLE VERSION</td>
<td>44</td>
<td>0.01%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>456,426</td>
<td>100%</td>
</tr>
</tbody>
</table>

**CSAPA**
The Colorado Student Assessment Program Alternate, or CSAPA, has been developed as a way to measure the academic knowledge of students who demonstrate their skills via expanded benchmarks in the content areas of the standards. The CSAPA is intended for a very small group of students with IEPs who have significant cognitive disabilities. Many of these students also require significantly different instructional delivery and technological supports.

The CSAPA differs from the CSAP in the way that students demonstrate their learning. Rather than a paper and pencil test, the CSAPA is a performance-based assessment. That is, students are observed in their abilities to participate in content-related activities,
such as attending to a story and answering comprehension questions and reading with a teacher or peer. Students who take the CSAPA are also able to show their abilities in math and science-related activities and skills through use of accommodations appropriate for the student. Each activity contains a number of performance indicators that have been validated as emerging literacy, math, and science skills. Since each student taking the assessment requires individualized supports to aid his/her learning, educators adapt materials and presentation formats appropriately.

The assessment measures how independently the student performs each indicator in the activity. Students are observed as they participate in each task to judge if they demonstrate the indicators without teacher assistance or if they need additional cues or prompts.

The CSAPA is a modified test aligned with Colorado Model Content Standards through expanded benchmarks. As such, it is intended to be helpful to educators and families when evaluating a student’s current knowledge of state standards.

Both the CSAP and CSAPA are examined by respective Technical Advisory Committees (consisting of state and national testing experts) and a federal “Peer Review” to ensure that they are valid and reliable assessments.

**Table 2: Similarities and Differences of the CSAP and CSAPA**

<table>
<thead>
<tr>
<th>Similarities</th>
<th>CSAP</th>
<th>CSAPA</th>
</tr>
</thead>
<tbody>
<tr>
<td>◦ Based on Colorado Standards</td>
<td>◦ Based on Colorado Standards</td>
<td></td>
</tr>
<tr>
<td>◦ Measures a student’s achievement</td>
<td>◦ Measures a student’s achievement</td>
<td></td>
</tr>
<tr>
<td>on grade level standards</td>
<td>on grade level standards</td>
<td></td>
</tr>
<tr>
<td>◦ Criterion-referenced assessment</td>
<td>◦ Criterion-referenced assessment</td>
<td></td>
</tr>
<tr>
<td>◦ Developed with teaching community</td>
<td>◦ Developed with teaching community</td>
<td></td>
</tr>
<tr>
<td>and content experts</td>
<td>and content experts</td>
<td></td>
</tr>
<tr>
<td>◦ Administered in Spring each year</td>
<td>◦ Administered in Spring each year</td>
<td></td>
</tr>
<tr>
<td>◦ Paper and pencil test</td>
<td>◦ Activity-based measure of performance</td>
<td></td>
</tr>
<tr>
<td>◦ Scored on correct responses to</td>
<td>◦ Scored on level of support needed to</td>
<td></td>
</tr>
<tr>
<td>multiple choice and constructed</td>
<td>perform each indicator</td>
<td></td>
</tr>
<tr>
<td>responses.</td>
<td>◦ Any adaptation necessary for student is</td>
<td></td>
</tr>
<tr>
<td>◦ Standardized accommodations</td>
<td>allowed</td>
<td></td>
</tr>
<tr>
<td>allowed for accountability (See</td>
<td>◦ 5 performance levels (Inconclusive, Exploring,</td>
<td></td>
</tr>
<tr>
<td>Table 1); non-</td>
<td>Emerging, Developing, Novice)</td>
<td></td>
</tr>
<tr>
<td>standardized accommodations are</td>
<td></td>
<td></td>
</tr>
<tr>
<td>allowed, but scores are</td>
<td></td>
<td></td>
</tr>
<tr>
<td>invalidated</td>
<td></td>
<td></td>
</tr>
<tr>
<td>◦ 4 performance levels (Unsatisfactory,</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Partially Proficient, Proficient,</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Advanced)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
FINDINGS

The committee reviewed a tremendous amount of research, assessment data, and survey information on issues related to the assessment of “students in the gap”. This review generated the following set of questions that guided the work and organize the findings.

- How many students are in the gap?
- What are the demographics of these students?
- Do these students show progress over time?
- How frequently are accommodations used on the CSAP?
- Does providing targeted instruction to these students make a difference?

**How many students are in the gap?**

The committee defines “students in the gap” as: 1) students with IEPs scoring in the lowest one-third of Unsatisfactory on the CSAP; and, 2) students making perfect scores on the CSAPA. Table 3 below provides a count of “students in the gap” based on one year of data (2005 Reading and Math Tests).

<table>
<thead>
<tr>
<th>Content Area</th>
<th>Reading</th>
<th>Math</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>All Students Grade 3-10</td>
<td>459,067</td>
<td>100.00%</td>
</tr>
<tr>
<td>Taking CSAP</td>
<td>444,407</td>
<td>96.80%</td>
</tr>
<tr>
<td>Taking/Eligible for CSAPA</td>
<td>4,024</td>
<td>.87%</td>
</tr>
<tr>
<td>Low 1/3 Unsat. CSAP, No IEP</td>
<td>915</td>
<td>.19%</td>
</tr>
<tr>
<td>Low 1/3 Unsat. CSAP, With IEP</td>
<td>1,637</td>
<td>.36%</td>
</tr>
<tr>
<td>Perfect Score on CSAPA</td>
<td>117</td>
<td>.03%</td>
</tr>
</tbody>
</table>

As Table 3 indicates, very few students (117 in Reading and 16 in Math) made perfect scores on the CSAPA. As a result, the committee spent most of its time and effort investigating “students in the gap” taking the CSAP.

It is also important to note that not all students who score in the lowest one-third of the Unsatisfactory category on the CSAP test are students with disabilities. For the 2005 tests, there were 915 students in Reading and 2,440 in Math who did not have an identified disability and scored in the lowest one-third of the Unsatisfactory category.
In addition, a relatively small percentage of CSAP tests (1.97% on the 2005 Reading exams) had scores invalidated for a number of reasons (parent refusal, test misadministration, student absent, student does not read English or Spanish, extreme frustration, student withdrew from school before completion). Some of these may be “students in the gap”; but because they did not receive a score, it is impossible to determine their proficiency level.

What are the demographics of these students?

The committee investigated the demographic properties of “students in the gap” as well, hoping to get a better understanding of who these students are. An examination of the 2005 CSAP data for “students in the gap” revealed:

- American Indian, Black, and Hispanic students comprise a greater percentage of “students in the gap” than “non-gap” students, while Asian and White “students in the gap” made up a smaller percentage of the population relative to “non-gap” students.

Table 4: A Comparison of Ethnicity: CSAP Reading Tests 2003-2005

<table>
<thead>
<tr>
<th>Ethnicity</th>
<th>Non-Gap</th>
<th>Gap</th>
</tr>
</thead>
<tbody>
<tr>
<td>Am. Ind.</td>
<td>1.21%</td>
<td>2.04%</td>
</tr>
<tr>
<td>Asian</td>
<td>3.02%</td>
<td>1.14%</td>
</tr>
<tr>
<td>Black</td>
<td>5.94%</td>
<td>12.60%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>24.72%</td>
<td>40.63%</td>
</tr>
<tr>
<td>White</td>
<td>65.11%</td>
<td>43.59%</td>
</tr>
</tbody>
</table>

- Disproportionate male/female ratios exist for “students in the gap”, with males outnumbering females nearly 2 to 1.

While this data may seem to indicate significant differences between “students in the gap” and the general population of students, it is very important to note that these disproportionalities are not uncommon for the population of students with disabilities. Thus the demographics of students in this group are only marginally different from all students with IEPs.
Do “students in the gap” make progress over time?

The committee investigated this issue by matching student records from the 2004 and 2005 CSAP assessments for Reading and Math. However, analyzing data for one year provides only a limited understanding of demonstrated achievement for this group of students. For example, reviewing results for Reading and Math for 2005, the vast majority of “students in the gap” are scoring at the very lowest possible scale score. Yet considering only one year’s data leaves a key question unanswered: “Are these students capable of making longitudinal growth?”

Unfortunately, limited data are available to answer this question, since only about 60% of students scoring in the lowest one-third of Unsatisfactory on CSAP can be matched from one year to the next. The inability to track a number of these students may be a result of some of them now taking the CSAPA. And, looking at several other variables in the CSAP database related to mobility (including “New in School”, “Migrant”, and several “Continuous Enrollment” variables) provides evidence that this group of students is more mobile than students not “in the gap”.

The available data indicate that most matched students show longitudinal growth. In fact, most of these students make substantial growth. Generally, a student needs to gain between 20 and 40 scale score points per year to remain at the same proficiency level. About 80% of “students in the gap” on the Reading tests and about 70% of “students in the gap” on the Math tests show improvements over that which a student naturally gains through scale score inflation from one grade to the next. The average student on an IEP in the lowest one-third of the Unsatisfactory category in Reading gains about 150 scale score points per year in addition to scale score inflation that occurs from one year to the next. For Math, the average student gains about 45 points per year in addition to scale score inflation. These results indicate that most students scoring in the lowest one-third of Unsatisfactory do, in fact, make tremendous gains from one year to the next. Therefore, the committee concludes that for these students the CSAP can measure academic progress.

There are, however, a relatively small number of students who do not make growth longitudinally on the CSAP. Specifically, there were 250 “students in the gap” (0.06% of students taking CSAP) on the Reading test and 658 “students in the gap” (0.15% of students taking CSAP) on the Math test whose scores either showed no growth or actually
declined from 2004 to 2005. For these students, the committee determined that the current administration of the CSAP may not reflect their academic achievements.

**How frequently are accommodations used on the CSAP?**

A specific set of standardized accommodations are allowed for students to access the CSAP test and, thus, to demonstrate what they know and are able to do without altering the reliability of the results. These accommodations are listed in Table 1 and described in Appendix B.

Although any student may use these accommodations if provided in daily instruction and used in other assessment administrations, state data indicate that the use of standardized accommodations decreases at each grade level. Research has shown that accommodations can level the playing field for students with disabilities during assessment situations (Elliot, 2002; Tindal 2002). Positive results have been demonstrated when students require and receive accommodations such as extended time and oral presentation during testing administration (Chiu & Pearson, 1999; Thompson, Blount, & Thurlow, 2002).

Colorado data suggest that “students in the gap” are not administered accommodations at significantly different levels than other students with disabilities. However, the administration of accommodations decreases substantially at higher grades. As Figure 1 indicates, Colorado results from the 2005 CSAP administration show that an increasing number of special education students at higher grades are not receiving accommodations.
A number of issues arise around the determination, administration, provision, and use of accommodations that could directly impact student performance on the CSAP (Elliott, 2002; NAEP Validity Study, 2002; Polloway, Epstein, & Bursuck, 2003). Decisions about whether or not to provide accommodations and which accommodations a student will use are determined by IEP teams. The CSAP Procedures Manual provides guidelines to IEP teams when determining accommodations for each student. (http://www.cde.state.co.us/cdeassess/csap/2006/2005_2006CSAPProcManFinal.pdf).

Accommodations are intended to lead to a more accurate assessment of what students know and can do for students who need those accommodations, without affecting the scores of those who do not need them (Shepard, Taylor, & Betebenner, 1998; Zuriff, 2000). Given the current information, it is unclear how the use of appropriate and individualized accommodations for special education students at all grade levels may affect their scores on the CSAP.

**Does providing targeted instruction to these students make a difference?**

The issues of providing targeted instruction to “students in the gap” and the effects such instruction can have on student achievement were fundamental to the committee’s considerations and recommendations. The committee reviewed information from a number of school districts that provide intensive, targeted, research-based instruction that has
shown a positive correlation with student achievement. This information demonstrates that providing intensive reading instruction to low performing students yields profound growth in reading content knowledge over time.
CONSIDERATIONS

The committee considered several options available to Colorado to better educate and assess “students in the gap”. While the committee recognizes that many of the following considerations have positive and desirable qualities, these considerations were ultimately rejected by the committee either because they did not meet the guiding principles the committee used in decision making or because the committee believed that given the available information it is premature to recommend such a change.

The Committee studied all of these considerations in depth and in the end decided not to recommend them. Instead, the committee found better solutions for “students in the gap”, which are addressed in the Recommendations section that follows.

Administer off-grade level testing

Off-grade level testing is a term that refers to the use of a test that is developed for students in one particular grade but used to assess a student who is in another grade. For example, an IEP team may determine that a ninth grade student should be assessed at the fifth grade level. The study committee discussed the off-grade level testing option at great length because it seems, on the surface, a fair way to assess students at their individual levels.

The committee examined the current research and recommendations in the education field concerning off-grade level testing (National Center of Educational Outcomes). The benefits for use of off-grade level testing include:

- Assessments align more closely with the instruction the student may be receiving;
- Measures of student learning are more accurate; and
- Testing may be less stressful for the student.

However, the concerns about use of off-grade level testing out-weigh the benefits and include:

- Expectations may be and may continue to be lower when students are not expected to meet the same targets as other students;
- Results fail to indicate student performance in terms of grade-level achievement standards or in comparison to peers in the same grade level;
- Research on states that have implemented off-grade level testing shows that there is wide variability in how IEP teams select the grade level at which the student should be assessed;
- Issues exist about how to equate scores across grade levels;
- Growth over time and adequacy of interventions are difficult to demonstrate when students are continually assessed with off-grade level tests;
- Aggregation of the results may not be feasible since the assessments are not comparable.

The current proposed rules released by the U.S. Department of Education on December 14, 2005\(^2\), state that off-grade level testing will not be permitted for *No Child Left Behind* purposes.

Additionally, the purpose of CSAP is to measure how well a school or district is teaching grade-level content standards to students. Off-grade level assessments would not provide this information. However, the committee does acknowledge that off-grade level testing may be appropriate for individual schools as they collect data for diagnostic and instructional purposes.

The committee does not recommend off-grade level testing at this time.

**Create an additional assessment**

The committee seriously considered recommending the creation of a new assessment for “students in the gap”. Further, the committee agreed that if such a recommendation were made, any resulting assessment would have to be valid and would have to have rigorous achievement standards.

The creation of an additional assessment would require tremendous resources (monetary and human) to address the following issues:

- Creation of an entirely new set of modified achievement standards, aligned with Colorado’s state standards;
- Development of an assessment for grades 3-10 in reading, writing, math and science which is aligned with the modified

achievement standards;
- Contracting with a test company to, at a minimum, provide for the printing, distribution, collection, and scoring of the assessment;
- Training of teachers and administrators in the eligibility for the new assessment and its administration to students;
- Administration of the test to students (which would require additional personnel time in schools);
- Conducting alignment studies; and
- Researching the validity and reliability of the assessment.

The development of an additional assessment in Colorado for this relatively small number of students was judged by the committee to be excessive and an inefficient use of resources, especially given that there are other options to better address the assessment needs of this group of students. These costs need to be considered in relationship to the number of students that would be affected. As has been previously discussed, the number of “students in the gap” not making progress in Reading is 250 and is 658 for Math.

**Adopt a modified assessment from a different state**

Another option is to use another state’s assessment. Under such an approach, Colorado would need to create modified achievement standards and then ensure the other state’s assessment aligns with our standards. The committee determined that the probability of finding such an assessment is unlikely.

**Remove students with disabilities from accountability calculations entirely**

The charge of HB 05-1246 directs the committee to investigate the effect of both including and excluding the scores of students with IEPs who are not CSAPA eligible when calculating ratings for the School Accountability Reports (SARs). While the committee did investigate this issue, it is important to note the difference between the legislation’s generic definition (all students with IEPs who do not take CSAPA) and the committee’s actual definition of “students in the gap” (students with IEPs who score in the lowest one-third of Unsatisfactory). With this said, a discussion of including or excluding the scores of all students with IEPs who are not CSAPA eligible follows.

Schools and districts are indeed affected by students with disabilities in accountability measures. For example, if the state were to remove the
scores of ALL students with disabilities from the SAR rating calculations, 418 schools (22.3%) would improve their ratings by one level. On the other hand, three schools (1.6%) would decline from an “Average” rating to a “Low” rating.

The Committee believes that the consequences of removing these students from state accountability systems may not be in the best interest of student academic achievement. Moreover, the removal of students with disabilities from the accountability systems is a violation of state and federal law.
RECOMMENDATIONS

The following recommendations reflect the committee’s efforts to identify methodologies to best assess how “students in the gap” are meeting Colorado Model Content Standards. In an effort to provide the strongest recommendations, the committee adhered to mutually agreed upon principles to ensure that sound data-driven recommendations kept the focus on student learning and on valid measurement of that learning. The following recommendations were endorsed by the entire committee.

Expand the eligibility for and the difficulty of the current CSAPA assessment

In an effort to best capture the performance of students who are currently “topping out” on the CSAPA assessment as well as of students who have consistently shown no growth on the CSAP, expansion of the group of students eligible to take the CSAPA could provide a more valid assessment of student learning for some “students in the gap”. Increasing the difficulty of the CSAPA would allow for these students to be more validly assessed. Further, moving some “students in the gap” who are not showing progress on CSAP into the CSAPA should not put Colorado over the 1% proficiency cap that the federal government allows for the number of students counted for Adequate Yearly Progress (AYP) purposes.

Increase the use of standardized accommodations

The committee finds that the lack of accommodations being administered to “students in the gap” is significant. The decreasing administration of these accommodations at higher grade levels was of particular concern. It is the consensus of the committee that Colorado should develop a systematic approach to encouraging, where appropriate, the use of allowable standardized accommodations on the CSAP. In addition, it is the recommendation of the committee that the Colorado Department of Education collect data on both the provision and the use of accommodations on the CSAP.

Provide an allowable non-standard accommodation/modification process for the CSAP for “students in the gap”

Currently, students who use non-standard accommodations on the CSAP have their scores invalidated and are counted as “no-scores” for accountability purposes. The Committee recommends that the
Colorado Department of Education provide for an allowable non-standard accommodation/modification process for “students in the gap” that adheres to the following parameters:

- Development of eligibility criteria that allow IEP teams to make determinations for these accommodations;
- Documentation practices that demonstrate the students have had instructional interventions that support the learning of the specific content area being assessed;
- Standardized administration procedures to ensure that these interventions do not give any student an unfair advantage in demonstrating his/her performance nor invalidate their score;
- Documentation practices to verify that students have used nonstandard accommodations/modifications in their daily instruction and assessment;
- A process for application to the Colorado Department of Education by the IEP team through the district assessment coordinator for the use of the allowable nonstandard accommodation/modification; and
- A system to ensure that student scores approved under this process are included for SAR and AYP calculations.

The committee recommends that this option be allowed under the additional flexibility in proposed federal rules for AYP calculations for students with disabilities.

**Promote intensive, targeted, research-based instruction**

The committee strongly encourages Colorado school districts to use research-based interventions with a record of effectiveness. Recognizing that numerous programs may be appropriate for different populations, the Colorado Department of Education could provide a clearinghouse for research-based interventions. This approach has been highly effective for literacy improvement and would benefit math proficiency as well.

**Investigate accountability measurements that could account for longitudinal growth**

State assessment performance categories often do not recognize growth for students in the Unsatisfactory performance category when these students do not move from one CSAP proficiency level to the next, despite gains made. The committee recommends that the state
study longitudinal growth and reporting systems which report and recognize progress within a performance level for all students.

*Investigate the effect of presenting the CSAP in its entirety to students in smaller sections over a longer period of days*

The committee recognizes that for many “students in the gap”, the CSAP is a lengthy, frustrating, and daunting experience, due in great part to the length and volume of the tests and materials. The committee holds that permitting many “students in the gap” to take the test over a longer period of time, in effect, breaking the test into smaller components, would allow them to better demonstrate their abilities. The committee recommends that the state study the effect of presenting the CSAP in its entirety to students in smaller sections over a longer period of days.

*Investigate abbreviating the CSAP*

The committee recommends that the state investigate the impact of shortening the CSAP test so that the overall number of items and length of time required to complete the test are reduced. The committee understands that a study must be conducted to determine the effect of removing items on the validity of the test. However, it is the recommendation of the committee that a shortened version of the CSAP which preserves the validity and reliability of the test is something Colorado should consider for “students in the gap.”
References


http://education.umn.edu/NCEO/OnlinePubs/Technical34.htm

APPENDIX A: GLOSSARY

**Accommodations**: CDE defines accommodations as changes made to the assessment procedures in order to provide a student with access to information and an equal opportunity to demonstrate knowledge and skills without affecting the reliability or validity of the assessment.

**Alternate Assessment**: An assessment designed for the small number of students with disabilities who are unable to participate in the grade-level state assessment, even with appropriate accommodations.

**AYP**: Adequate Yearly Progress—participation and performance targets set forth under the federal *No Child Left Behind* for reading and math, and graduation rate.

**CSAP**: Colorado Student Assessment Program- designed for grades 3-10 in reading, writing and math and grades 5, 8, and 10 in science.

**CSAPA**: Colorado Student Assessment Program Alternate- available to students with significant cognitive disabilities; a modified test aligned with Colorado Model Content Standards through expanded benchmarks.

**IDEA**: Individuals with Disabilities Education Act - federal law requiring special education services for students with disabilities.

**IEP**: Individualized education program/plan – a student with disabilities has such a plan that works in conjunction with classroom instruction and content standards.

**Modified achievement standards**: standards that are aligned with grade-level content standards, but are modified in such a manner that they reflect reduced breadth or depth of grade-level content.

**NCLB**: *No Child Left Behind*—federal law requiring every student to be tested; requires alignment with IDEA for students with disabilities and accountability provisions for all students.

**Off-grade level testing**: Refers to a test that is developed for students in one particular grade and used to assess a student who is in another grade.
**SAR**: School Accountability Report - required by state law; CDE-generated report on school performance based on CSAP and ACT scores and displaying other demographic information.

**“Students in the Gap”**: Students with IEPs scoring in the lowest one-third of Unsatisfactory on the CSAP; students making perfect scores on the CSAPA.
APPENDIX B – STANDARD CSAP ACCOMMODATIONS

CSAP Accommodations That MUST Be Documented for Reading

<table>
<thead>
<tr>
<th>Timing/Scheduling</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Time extension of more than 10 minutes in a session. Any student who may need more than 60 minutes to complete a test session should be identified ahead of time whenever possible and preferably the assessment should be administered in a separate setting. This accommodation should be documented <strong>only</strong> if the student actually takes more than 10 extra minutes to complete the session.</td>
</tr>
<tr>
<td>• Administering more, but shorter, sessions, when the total testing time exceeds 60 minutes. A session must be completed in a single day.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Presentation</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Braille version of the assessment.</td>
<td>• Use of scribe to write oral responses or fill in bubbles in test book.</td>
</tr>
<tr>
<td>• Standard 18-point large-print version of the assessment. Students must be registered with the Colorado Instructional Media Center to receive a booklet with a font size greater than 18-point.</td>
<td>• Use of scribe to write oral responses to constructed-response items.</td>
</tr>
<tr>
<td>• Reading aloud of only the directions for the reading assessment.</td>
<td>• Use of signing or pointing as alternative responses.</td>
</tr>
<tr>
<td>• Reading aloud in the student’s native language of only the directions for the reading assessments.</td>
<td>• Use of assistive technology restricted to the use of augmentative communication devices, computers, personal portable keyboards such as an AlphaSmart, and Brailles. Voice output must be disabled during the reading assessments. If the communication device produces a typed response, the response must be transcribed into a scannable test book for scoring exactly as it is written.</td>
</tr>
<tr>
<td>• Signing of only the directions for the reading assessments.</td>
<td></td>
</tr>
</tbody>
</table>
CSAP Accommodations that MUST Be Documented for Writing, Mathematics and Science

**Timing/Scheduling**

- Time extension of more than 10 minutes in a session. Any student who may need more than 60 or 65 minutes to complete a test session should be identified ahead of time whenever possible and preferably the assessment should be administered in a separate setting. This accommodation should be documented only if the student actually takes more than 10 extra minutes to complete the session.
- Administering more, but shorter sessions, when the total testing time exceeds 60 or 65 minutes per session. A session must be completed in a single day.

<table>
<thead>
<tr>
<th>Presentation</th>
<th>Response</th>
</tr>
</thead>
</table>
| - Braille version of the assessment.  
- Standard 18-point large-print version of the assessment. Students must be registered with the Colorado Instructional Media Center to receive a booklet with a font size greater than 18-point.  
- Signing of the entire assessment, including word problems.  
- Use of additional manipulatives for the mathematics assessment, such as number lines, “Touch Math,” and counting beans.  
- **Oral Presentation in English:** For writing, mathematics and science, test directions, glossary words and their definitions, questions and response options¹ may be read aloud.  
- **Oral Presentation in the Student’s Native Language:** For mathematics and science, test directions, glossary words and their definitions, questions and response options¹ may be read aloud in the student’s native language.  

For writing, test directions and glossary words and their definitions are the only parts of the test that may be read aloud. Translating and reading aloud of questions and/or response options is not allowed. | - Use of scribe to write oral responses or fill in bubbles in test book.  
- Use of a scribe to write oral responses to constructed-response items.  
- Use of a scribe to translate a student’s oral responses from a language other than English into the test book.²  
- Use of signing or pointing as alternative responses.  
- Use of assistive technology restricted to the use of augmentative communication devices, computers, personal portable keyboards such as an AlphaSmart, and Braille writers. Spell-checking and grammar-checking capabilities must be disabled during the writing assessment. If the communication device produces a typed response, the response must be transcribed into a scannable test book for scoring exactly as it is written. |

¹ Response options on multiple-choice questions may be read aloud for the writing, mathematics, and science assessments, except those designated through additional material distributed by the Colorado Department of Education.

² Translation of student responses from the student’s native language into English is not an allowable accommodation for writing tests.
Accommodations That DO NOT Need to Be Documented for Any Content Area

<table>
<thead>
<tr>
<th>Timing/Scheduling</th>
<th>Setting/Environment</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Time of day.</td>
<td>- Location appropriate to the testing needs of students.</td>
</tr>
<tr>
<td>- Time extension of up to 10 minutes in a testing session.</td>
<td>- Grouping students: whole classroom, small groups, and individual administration.</td>
</tr>
<tr>
<td>- Allowing stretch breaks for groups or for individual students as needed.</td>
<td>- Administration of the assessment with or without accommodations by individuals other than the student’s usual teacher(s) such as special educators, paraprofessionals, and teacher’s aides. Students may not have the assessment administered to them by a relative.</td>
</tr>
<tr>
<td>- Scheduling of sessions to include more breaks, as long as the total testing time does not exceed 10 extra minutes.</td>
<td></td>
</tr>
<tr>
<td>- Scheduling more time between sessions. Any session must be completed within a single day. The entire assessment must be completed within the testing window.</td>
<td></td>
</tr>
<tr>
<td>- Scheduling of sessions in a different order, except for the writing assessment. The drafting of the extended response in grades 4-10 must be completed before the editing session, and the two sessions must occur within the same week.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Presentation</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Use of devices normally used by students for kinesthetic, visual, or auditory assistance (e.g., pencil grips, noise buffers, visual magnification devices/technology [e.g., hand held magnifiers, CCTVs, screen enlargement programs], and auditory amplification devices such as hearing aids).</td>
<td>- Spelling words to students who request it, with the exception of the writing assessment where spelling will be scored.</td>
</tr>
<tr>
<td>- Rereading the script in the administration manual to all students when requested by any student. (Note that this does not refer to reading the test directions for students aloud.)</td>
<td></td>
</tr>
</tbody>
</table>
APPENDIX C: CHARGE TO THE COMMITTEE

The department, in conjunction with the study committee, shall conduct a study of the administration of assessments for students with an individual educational program pursuant to section 22-20-108 who are not eligible to take the CSAP-A assessment. The study shall include, but need not be limited to, an examination and evaluation of:

(a) The effect of the administration of assessments on students with individual educational programs who are not eligible to take the CSAP-A assessment, including but not limited to the effect on students who are deemed unable to complete the assessment;

(b) Whether, for students with an individual education program who are not eligible for the CSAP-A assessment, it would be appropriate to designate in a student's individual educational program the grade or grades of the CSAP assessments that the student should be administered;

(c) The need for school districts to be held accountable for teaching state content standards to students with individual educational programs who are not eligible to take the CSAP-A assessment;

(d) The effect of both including and not including the scores of students with individual educational programs who are not eligible to take the CSAP-A assessment in the calculations of school performance ratings pursuant to section 22-7-604;

(e) A survey of the types of assessments used by other states in assessing students who are comparable to students in this state who have individual educational programs who are not eligible to take the CSAP-A assessment, whether other states use those assessment scores in calculating school performance ratings, whether the assessments align with the state model content standards adopted pursuant to section 22-7-406, and whether the assessments have been, or would likely be, approved by the federal department of education; and

(f) Federal constitutional, legal, and regulatory issues surrounding the assessment of students with individual educational programs who are not eligible to take the CSAP-A assessment and how federal funding of public schools may be impacted by administering such assessments.
APPENDIX C

State Guidelines for MAS
State Guidelines for MAS

Focus Questions: What existing program documents provide evidence of meeting these requirements? Which State office will be responsible for preparing materials for peer review? What additional information is needed to prepare for peer review?

<table>
<thead>
<tr>
<th>Peer Review Guidance Critical Element</th>
<th>Requirements for State Guidelines in CFR 200.1</th>
<th>State’s Evidence of Monitoring Implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.2 (2a)</td>
<td>For students assessed on either alternate or modified achievement standards, the State must: 1) Establish and monitor implementation of clear and appropriate guidelines for IEP Teams to apply in determining the students who meet eligibility criteria for AA-MAS in one or more subjects.  • The student’s disability has precluded the student from achieving grade-level proficiency as demonstrated by objective evidence of the student’s academic performance (such as the State’s grade-level assessment or other valid measures of academic achievement); and  • The student’s progress to date in response to appropriate instruction, including special education and related services designed to address the student’s individual needs, is such that, even if significant growth occurs, the IEP Team is reasonably certain that the student will not achieve grade-level proficiency within the year covered by the student’s IEP; and  • The student’s IEP goals for subjects assessed by the Statewide system are based on the academic content standards for the grade in which the student is enrolled.</td>
<td>Two types of evidence are required. 1) State guidelines for eligibility 2) Evidence that the State monitors implementation of the eligibility guidelines, such as IEP form specifies how disability impacts ability to learn IEP-- team must use objective evidence to justify placement in the MAS separately for each content area tested. State monitoring might require IEP format that indicates separate decision for each content area. Does the State provide training to IEP Teams in the analysis of objective data for this purpose? Does the State take any action if appropriate data is not in use? If student scored advanced on MAS has the IEP Team considered placement in the general test? Are Standards based IEPs in use throughout the State? Does the State have a method of reviewing local IEPs to determine this? Reference: Forum paper</td>
</tr>
<tr>
<td>6.2 (3a)</td>
<td>2) inform IEP Teams that students may be from any of the disability categories listed in IDEA</td>
<td>Instructions/training provided to IEP Teams with data showing the proportion of teams trained annually.</td>
</tr>
</tbody>
</table>

U.S. Department of Education  
Peer Review of Alternate Assessments Based on Modified Achievement Standards  
May 5, 2008
| 6.2 (2c) | 3) Provide IEP Teams a clear explanation of the differences between AA-AAS, AA-MAS and general assessments include any effects of State and local policies resulting from taking an alternate assessment based on alternate or modified achievement standards (such as qualifying for a regular high school diploma). | See sample chart from TX See sample chart from ED |
| 6.2 (2d) | 4) Ensure that parents are informed that their child will be assessed on alternate or modified achievement standards | Sample letter to parents Sample IEP form (including parent signature) |

**IN ADDITION, For students assessed on MAS, the State must:**

| 6.2 (3b) | 1) Inform IEP Teams that a student may be assessed on MAS in one or more subjects | State guidelines or comparison chart might include this information |
| 6.2 (3c) | 2) **establish and monitor implementation** of guidelines for IEP Teams in developing and implementing IEPs which must include IEP goals based on academic content standards for the grade in which a student is enrolled and be designed to monitor a student’s progress in achieving the student’s standards-based goals | What training provided to IEP Teams in development of standards-based IEPs? What State review of IEPs to confirm that student’s instructional goals reflect grade-level content standards? What action taken when this is not the case? |
| 6.2 (3d) | 3) Ensure that students assessed on MAS have access to the general curriculum, including instruction, for the grade in which the students are enrolled | Does the State routinely monitor indicators such as: Course descriptions and enrollment patterns Student performance on IEP goals |
| 6.2 (3e) | 4) Ensure that students assessed on MAS are not precluded from attempting to complete requirements for regular high school diploma | Evidence that some students assessed on MAS also attempt to complete requirements (such as a graduation test or State alternative) for graduation. |
| 6.2 (3f) | 5) Ensure that each IEP Team reviews annually the decision to assess a student on MAS for each subject tested. | Does the State routinely monitor timeliness of annual IEP preparation/revision? If MAS scores are rising over time, has the State determined that this is NOT the result of inappropriate placement in the MAS |
APPENDIX D

TAKS Assessment Comparison Chart for Students Receiving Special Education Services
**Introduction**

**TAKS Assessment Comparison Chart for Students Receiving Special Education Services**

<table>
<thead>
<tr>
<th>Curriculum</th>
<th>TAKS</th>
<th>TAKS (Accommodated)</th>
<th>TAKS–M</th>
<th>TAKS–Alt</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grades 3–11: General education 504 eligibility Receiving special education services</td>
<td>TEKS at enrolled grade-level with or without accommodations</td>
<td>TEKS at enrolled grade-level with accommodations</td>
<td>TEKS at enrolled grade-level with modifications and/or accommodations</td>
<td>TEKS at enrolled grade-level accessed through prerequisite skills</td>
</tr>
<tr>
<td>Multiple choice/written exam; embedded field test items New Century Schoolbook 10–12 point font</td>
<td>Grades 3–11: Receiving special education services; ARD committee decision based on accommodations eligibility</td>
<td>Grades 3–11: Receiving special education services; ARD committee decision based on participation requirements</td>
<td>Grades 3–11: Significant cognitive disabilities; Cannot participate in other statewide assessments even with accommodations &amp; modifications; Determined by ARD committee (per participation requirements)</td>
<td></td>
</tr>
<tr>
<td>Format</td>
<td>score of 2100</td>
<td>score of 2100</td>
<td>Based on modified academic achievement standards; State will set a passing standard after first operational year; ARD committee does not set the passing standard</td>
<td>Set by the state based on alternate academic achievement; established Fall 2007</td>
</tr>
<tr>
<td>Passing Standard</td>
<td>Must be documented in IEP; Routinely used in classroom instruction and testing; Allowable accommodations listed in the 2007–2008 Accommodations Manual; Others must be approved through accommodation request form</td>
<td>Must be documented in IEP; Routinely used in classroom instruction and testing; Allowable accommodations listed in the 2007–2008 Accommodations Manual; Others must be approved through accommodation request form</td>
<td>Must be documented in IEP if not part of standard administration procedure, Routinely used in classroom instruction and testing; Listed as allowable or approved through accommodation request form</td>
<td>N/A: Supports that are routinely used by the student should be listed in the Activity Description</td>
</tr>
<tr>
<td>Accountability</td>
<td>State (AEIS): grades 3–11 all tested subjects Federal (AYP): grades 3–8, 10 reading/ELA, and mathematics</td>
<td>State (AEIS): limited to tested grades in science and social studies and all subjects at grade 11 Federal (AYP): same as TAKS</td>
<td>State (AEIS): not included until at least 2010 Federal (AYP): same as TAKS, subject to 2% cap on proficient results</td>
<td>State (AEIS): not included until at least 2010 Federal (AYP): same as TAKS, subject to 1% cap on proficient results</td>
</tr>
<tr>
<td>English Language Learners (ELLs)</td>
<td>LAT for LEP-exempt students in mathematics, reading, and science in grades 3–8 and 10; LEP exemptions for writing, social studies, and grade 9 tests Spanish tests available at grades 3–6 (all subjects)</td>
<td>LAT for LEP-exempt students in mathematics, reading, and science in grades 3–8 and 10; LEP exemptions for writing, social studies, and grade 9 tests Spanish tests available at grades 3–6 (all subjects)</td>
<td>LAT for LEP-exempt students in mathematics, reading, and science in grades 3–8 and 10; LEP exemptions for writing, social studies, and grade 9 tests no Spanish tests available</td>
<td>No LEP exemptions or LAT: Observational assessments can be developed using any language or other communication method routinely used with the student</td>
</tr>
<tr>
<td>Student Success Initiative (SSI)</td>
<td>Must pass Grade 3 reading and Grades 5 and 8 reading and mathematics assessment for promotion; 3 testing opportunities; Grade Placement Committee (GPC) determines promotion or retention</td>
<td>Must pass Grade 3 reading and Grades 5 and 8 reading and mathematics assessment for promotion; 3 testing opportunities; ARD Committee determines promotion or retention</td>
<td>Does not apply for the 2008 administration (no retest opportunities available for the 2008 administration); ARD committee decides promotion/retention</td>
<td>Does not apply to students eligible to take this assessment</td>
</tr>
<tr>
<td>Graduation Requirement</td>
<td>Minimum/ Recommended/ Distinguished Plan: Must pass mathematics, ELA, science, and social studies assessments at the exit level</td>
<td>To Be Determined</td>
<td>Completion of IEP as determined by the ARD committee which may include credit and curriculum requirements, demonstration of employability skills, and/or reaching the age of 22</td>
<td>Completion of IEP as determined by the ARD committee which may include credit and curriculum requirements, demonstration of employability skills, and/or reaching the age of 22</td>
</tr>
</tbody>
</table>

2007–2008 Revised ARD Committee Decision-Making Process for the Texas Assessment Program
http://www.tea.state.tx.us/student.assessment/
APPENDIX E

Comparison of Alternate Assessments based on Alternate and Modified Achievement Standards with the General Assessment
## Comparison of Alternate Assessments based on Alternate and Modified Achievement Standards with the general assessment (Sample)

<table>
<thead>
<tr>
<th></th>
<th>Alternate Assessment based on Alternate Academic Achievement Standards (1%)</th>
<th>Alternate Assessment based on Modified Academic Achievement Standards (2%)</th>
<th>General assessment based on Grade-Level Academic Achievement Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Content standards on which the test is based</td>
<td>• “Extended” standards may include substantially simplified content, including pre-requisite skills</td>
<td>• Grade-level academic content standards</td>
<td>• Grade-level academic content standards</td>
</tr>
<tr>
<td>Achievement standard levels</td>
<td>• Must have 3 levels&lt;br&gt;• Reports and other documents must convey meaning of the labels relative to other tests used for AYP</td>
<td>• Must have 3 levels&lt;br&gt;• Reports and other documents must convey meaning of the labels relative to other tests used for AYP</td>
<td>• Must have 3 levels&lt;br&gt;• Reports and other documents must convey meaning of the labels relative to other tests used for AYP</td>
</tr>
<tr>
<td>Performance level descriptors</td>
<td>• Must be content specific&lt;br&gt;• Must differentiate performance across levels and across grades/grade spans</td>
<td>• Must be content specific&lt;br&gt;• Must differentiate performance across levels and across grades&lt;br&gt;• If labels are the same as general test, must differentiate meaning for MAS</td>
<td>• Must be content specific&lt;br&gt;• Must differentiate performance across levels and across grades</td>
</tr>
<tr>
<td>Blueprint and Item Specifications</td>
<td>• Blueprint shows coverage of 3 extended standards each in reading, mathematics and science. Two examples of student work required for each of the 3 standards per content area&lt;br&gt;• “Items” are standardized tasks provided by the State. Teacher may select.</td>
<td>• Blueprint shows coverage of all grade-level reading content standards&lt;br&gt;• 35 items - all are multiple choice with one correct answer and 2 plausible distractors</td>
<td>• Blueprint shows coverage of all grade-level reading content standards&lt;br&gt;• 60 multiple choice items with one correct answer and 3 plausible distractors and 4 short-answer constructed response items</td>
</tr>
</tbody>
</table>

Note: The content in this paper is based on current facts and research available. As more information related to the AA-MAS becomes available, the considerations and emerging best practices will need to be updated.
### Alternate Assessment based on Alternate Academic Achievement Standards (1%)
- Format may permit variation in test content for individual students if results can be aggregated.
- Administration occurs throughout the year

### Alternate Assessment based on Modified Academic Achievement Standards (2%)
- Built on grade-level content but with less difficult items.
- Test forms standardized
- Spring administration

### General assessment based on Grade-Level Academic Achievement Standards
- Grade-level content.
- Test forms standardized
- Spring administration

<table>
<thead>
<tr>
<th>Assessment format</th>
<th>Alternate Assessment based on Alternate Academic Achievement Standards (1%)</th>
<th>Alternate Assessment based on Modified Academic Achievement Standards (2%)</th>
<th>General assessment based on Grade-Level Academic Achievement Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Assessment format</strong></td>
<td>• Format may permit variation in test content for individual students if results can be aggregated.</td>
<td>• Built on grade-level content but with less difficult items.</td>
<td>• Grade-level content.</td>
</tr>
<tr>
<td></td>
<td>• Administration occurs throughout the year</td>
<td>• Test forms standardized</td>
<td>• Test forms standardized</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Spring administration</td>
<td>• Spring administration</td>
</tr>
<tr>
<td><strong>Accommodations</strong></td>
<td>• Restricted to those that do not invalidate test results</td>
<td>• Restricted to those that do not invalidate test results</td>
<td>• Restricted to those that do not invalidate test results</td>
</tr>
<tr>
<td><strong>Who is eligible</strong></td>
<td>• Student with the most significant cognitive disabilities.</td>
<td>• Student whose disability has precluded the student from achieving proficiency, as demonstrated by objective evidence of the student’s performance and whose progress is such that, even if significant growth occurs, the student’s IEP Team is reasonably certain that the student will not achieve grade-level proficiency within the year covered by the IEP. (504 and LEP students NOT eligible.)</td>
<td>• All students</td>
</tr>
</tbody>
</table>

Note: The content in this paper is based on current facts and research available. As more information related to the AA-MAS becomes available, the considerations and emerging best practices will need to be updated.
APPENDIX F

A Seven-Step Process to Creating Standards-based IEPs,
A Seven-Step Process to Creating Standards-based IEPs

Note: This document is a companion to the “Standards-based IEP Examples” tool found at www.projectforum.org.

This document presents a seven-step process for developing IEPs that are aligned with state academic grade-level content standards. Each step is followed by guiding questions for the IEP team to consider in making data-based decisions. This process can help school personnel to: (a) consider each student’s strengths and needs to develop goals focused on closing the gaps between the student’s levels of academic achievement and grade-level standards; and (b) use data to make decisions, including selecting the most appropriate assessment option. The goal is to support IEP teams to develop documents that, when implemented, provide access to the general curriculum and enable students to demonstrate academic achievement linked to grade-level content.

Prior to developing IEPs, all IEP team members, including parents, need to be familiar with the general education curriculum including the state’s academic content standards and state assessments used for calculating adequate yearly progress (AYP). In order to make informed decisions about each student’s strengths and needs, the IEP team should consider how the student is performing in relation to the state’s grade-level content standards for the grade in which the student is enrolled.

The seven major steps that educators can take to develop a standards-based IEP are:

Step 1: Consider the grade-level content standards for the grade in which the student is enrolled or would be enrolled based on age.

Ask:
- What is the intent of the content standard?
- What is the content standard saying that the student must know and be able to do?

Step 2: Examine classroom and student data to determine where the student is functioning in relation to the grade-level standards.

Ask:
- Has the student been taught content aligned with grade-level standards?
- Has the student been provided appropriate instructional scaffolding to attain grade-level expectations?
- Were the lessons and teaching materials used to teach the student aligned with state grade-level standards?
- Was the instruction evidence-based?

Step 3: Develop the present level of academic achievement and functional performance.

Describe the individual strengths and needs of the student in relation to accessing and mastering the general curriculum.

Ask:
- What do we know about the student’s response to academic instruction (e.g., progress monitoring data)?
- What programs, accommodations (i.e., classroom and testing) and/or interventions have been successful with the student?
- What have we learned from previous IEPs and student data that can inform decision making?
- Are there assessment data (i.e., state, district and/or classroom) that can provide useful information for making decisions about the student’s strengths and needs?

These steps are adapted from materials on the Alabama website regarding standards-based IEPs found at http://www.alsde.edu/html/sections/section_detail.asp?section=65&footer=sections
Consider the factors related to the student’s disability and how they affect how the student learns and demonstrates what he or she knows.

**Ask:**
- How does the student’s disability affect participation and progress in the general curriculum?
- What supports does the student need to learn the knowledge and attain the skills to progress in the general curriculum?
- Is the student on track to achieve grade-level proficiency within the year?

---

**Step 4: Develop measurable annual goals aligned with grade-level academic content standards.**

**Ask:**
- What are the student’s needs as identified in the present level of performance?
- Does the goal have a specific timeframe?
- What can the student reasonably be expected to accomplish in one school year?
- Are the conditions for meeting the goal addressed?
- How will the outcome of the goal be measured?

---

**Step 5: Assess and report the student’s progress throughout the year.**

**Ask:**
- How does the student demonstrate what he/she knows on classroom, district and state assessments?
- Are a variety of assessments used to measure progress?
- How will progress be reported to parents?

---

**Step 6: Identify specially designed instruction including accommodations and/or modifications needed to access and progress in the general education curriculum.**

**Ask:**
- What accommodations are needed to enable the student to access the knowledge in the general education curriculum?
- What accommodations have been used with the student and were they effective?
- Has the complexity of the material been changed in such a way that the content has been modified?

---

**Step 7: Determine the most appropriate assessment option.**

**Ask:**
- What types of assessments are offered in my state?
- What types of responses do different state assessments require?
- What are the administrative conditions of the assessment? (i.e., setting, delivery of instructions, time allotted, etc.)
- What accommodations are allowed on the assessment(s)?
- Are the accommodations approved for the assessment also used in the classroom?
- Has the student received standards-based, grade-level instruction?
- Was the instruction evidence based?
- What is the student’s instructional level?
- How different is the student’s instructional level from the level of typical peers?
- Can the student make progress toward grade-level standards in the same timeframe as typical peers? (If no, consider modified academic achievement standards)
- What can be learned from the student’s previous state assessment results?
- Can the student demonstrate what he/she knows on the assessment option under consideration?
APPENDIX G

Rhode Island Enhanced Assessment Grant.

New England Compact
APPENDIX H

Kansas State Item Specifications
Notes:
KAMM reading passages and items were designed to facilitate students’ ability to demonstrate their grade-level content knowledge and skills, as specified in the state’s indicators, by minimizing or removing the effects of processing or physical challenges related to the students’ disabilities, without significant alteration of the assessed construct. Therefore, the KAMM design considers the particular needs of the students eligible for this assessment in order to increase their access to the assessed content—appropriate access to test content is necessary to ensure the validity of the assessment results. Lack of access could result in the measurement of sources of variance that are not related to the intended test content (construct irrelevance) or could allow construct-irrelevant abilities to interfere with that student’s ability to fully demonstrate what he or she knows and can do, and subsequently the test results underestimate the student’s achievement (under-representation).

Thus, the overall goals for creating a passage for a modified reading assessment include ensuring that the text contains enough detail to be engaging and supportive of test items that assess grade-level content, yet purposefully simplified for the KAMM student population so as to reduce the construct-irrelevant language as well as the cognitive complexity of the content without significantly altering the construct assessed. Below are key strategies for increasing access for the KAMM student population. Common to these strategies is the basic notion of facilitating or supporting students’ processing of the text by:

- Reducing sentence, paragraph, and passage length to minimize demands on working memory.
- Using text with familiar/common topics to KAMM students
- Creating clear, literal, explicit connections within the text
- Organizing and formatting text to facilitate students’ processing of information related to overall purpose/theme (e.g., use of subheadings, bulleted lists, repetition of key words/information)

Passage Word Count and Readability
Word count and readability of KAMM passages are reduced to decrease the working memory demands on students. For technical texts, sufficient information and context is presented to help students respond to the questions, but the text in general is less complicated and detailed, and presents little, if any, extraneous information.

Grade 8 KAMM passages are limited to 800 words; this KAMM passage has 391 words, which is appropriate at grade 8. General education passages range from 500-1500 words per passage.

The Lexile readability score of 810 falls within the lower limits of the grade 8 Lexile reader measure, and thus is at a lower readability level than grade 8 general education passages, yet remains on-grade level.
Sentence structure
Simple grammatical structures are used and sentence length is kept to a minimum in order to facilitate students’ processing of information. Punctuation marks associated with more complex sentence structures such as commas, colons, and semicolons, are avoided when possible. Sentences follow the general rule of containing one main idea, purpose, or event (i.e., presenting elements of a complex idea separately) in order to help students focus on key pieces of information.

Paragraph structure
Paragraphs are generally short (two to four simple sentences) and focus on a single purpose or event. This grouping of information is intended to facilitate students’ information processing by decreasing demand on working memory. Also, when possible, paragraphs start with a topic sentence in order to help focus students on the key information/idea in a paragraph and to provide structure to the information presented. Subsequent sentences support students’ understanding of the key information/idea in the topic sentence.

Connections within text
Connections between parts of text or information within the text are explicit to minimize the need for inference. Additionally, passages use redundant statements to reduce demand on working memory (i.e., to provide readers with support in remembering prior text) and help strengthen encoding of information.

Text organization and formatting
This passage is organized into three distinct sections (including the introduction). Each section is spatially distinct and has a bold-faced subheading, and uses bullets to further organize information. This organization and formatting strategy provides a structure for grouping information and highlights key information, thereby decreasing demands on working memory and facilitating students’ processing of the text.
The Capado cactus grows in the country of Chile. The cactus lives 60 to 70 years. When a cactus dies, it is cut down. The dead cactus may be used as firewood. But often, it is used for something much more interesting than firewood. The dead cactus is used to make a musical instrument called a rainstick.

The dead cactus is cut into long pieces. Each piece makes a rainstick. First, the sharp thorns are pulled out. Then, the thorns are pushed back into the soft cactus. Next, the cactus is placed in the sun to dry. When it is dry, the hollow cactus is filled with small pebbles. The ends of the cactus are sealed with pieces of wood.

When the cactus tube is turned upside down, the pebbles tumble slowly through the thorns. The sound made by the falling pebbles is like a soft and gentle rain.

You can make your very own rainstick. All you have to do is follow these simple directions.

Materials:

- The cardboard tube from a roll of paper towels
- Marker
- About 30 1-inch nails
- Masking or packing tape
- Paper
- Uncooked rice, popcorn, or small beans
- Paints or stickers

Directions:

1. Cardboard tubes have a spiral seam. Use a marker to draw dots all the way down the spiral seam of the tube. The dots should be about a half inch apart. (See the picture.)

2. Poke a nail all the way in at each dot. The nails should not poke through the other side of the tube.

3. Wrap tape around the tube to hold the nails in place.
4. Cut two circles of paper just a little bigger than the ends of the tube. Tape one of the circles over one end of the tube.

5. Completely cover the circle with tape.

6. Pour a handful of rice, popcorn, or beans into the open end of the tube. Cover the open end with your hand. Turn the tube over. Do you like the sound? Add more rice, popcorn, or beans to find a sound you like. (Beans and popcorn will make a loud sound. Rice will make a softer sound.)

7. Put the second circle of paper over the open end of the tube. Seal that end shut with tape.

8. Decorate your rainstick with paints or stickers.

Your rainstick is complete. Turn it over and listen to the rain.
R.8.1.3.4
▲ identifies and determines the meaning of figurative language including ▲ similes, ▲ metaphors, ▲ analogies, ▲ hyperbole, ▲ onomatopoeia, ▲ personification, ▲ idioms, ▲ imagery, and symbolism.

Read the sentence below from the passage.

The sound made by the falling pebbles is like a soft and gentle rain.

The sentence is an example of which type of figurative language?

A. simile*
B. hyperbole
C. personification

---

**Note:**
This item assesses the central skill reflected in the indicator by requiring students to recognize a simile in the passage. Although this item requires the ability to recognize a simile in the passage, the simile chosen (the sound of the rainstick) is an essential aspect of story and thus is likely an activated concept for the student. The demand on working memory will likely be reduced by selecting an activated concept, as activated concepts are, by definition, in working memory.

Additionally, presenting three versus four multiple-choice options reduces the demand on students’ working memory because the number of possible answers the student needs to consider and select among is reduced.
R.8.1.4.2 ▲ understands the purpose of text features (e.g., title, graphs/charts and maps, table of contents, pictures/illustrations, boldface type, italics, glossary, index, headings, subheadings, topic and summary sentences, captions, sidebars, underlining, numbered or bulleted lists) and uses such features to locate information in and to gain meaning from appropriate-level texts.

The purpose of the bulleted list is to show the reader

A. how to make a rainstick.
B. why people make rainsticks.
C. what is needed to make a rainstick.*

Note:
This item assesses the central skill reflected in the indicator by structuring the item in a way that reduces the cognitive processing demands on students. As noted above in the indicator description, the supporting text can take several different forms (definitions, restatements, examples, descriptions), each offering different levels of support for deriving the meaning of a word and subsequently requiring different strategies for cognitive processing by the student. Although this item requires understanding the purpose of a specific text feature, answer choices are tied to the passage. Cognitive demand is reduced for this item by providing answer choice options that are concretely tied to the passage compared to abstractly worded answer choices.

Additionally, presenting three versus four multiple-choice options reduces the demand on students’ working memory because the number of possible answers the student needs to consider and select among is reduced.
R.8.1.4.8
▲explains cause-effect relationships in appropriate-level narrative, expository, technical, and persuasive texts.

What causes the rain sound made by a cactus rainstick?

A. the sharp thorns being pulled out of the cactus
B. the pieces of wood sealing the ends of the cactus
C. the pebbles falling through the thorns in the cactus*

Note:
This item assesses the central skill reflected in the indicator, but at a lower level of cognitive complexity. The cause and effect connection between the pebbles and the rain sound is explicitly stated in the passage. Therefore, the item requires students to either recall the text or return to the passage and locate (identify, recognize) the correct answer. The explicit information in the text reduces the cognitive processing requirements of the item.

Additionally, presenting three versus four multiple-choice options reduces the demand on students’ working memory because the number of possible answers the student needs to consider and select among is reduced.
R.8.1.4.10
Identifies the topic, main idea(s), supporting details, and theme(s) in text across the content areas and from a variety of sources in appropriate-level text.

What is the passage mainly about?

A. the music made by a rainstick
B. the steps for making a rainstick*
C. the cactus used to make a rainstick

Note:
This item assesses the central skill reflected in the indicator, but at a lower level of cognitive complexity by focusing directly on the student’s ability to identify the main topic, rather than the information/details that support the main topic. Limiting the item to only the main topic addresses the essence of the indicator, while not increasing the cognitive processing load required by adding supporting details. Thus cognitive complexity is low.

Additionally, presenting three versus four multiple-choice options reduces the demand on students’ working memory because the number of possible answers the student needs to consider and select among is reduced.
APPENDIX I

States’ Alternate Assessments Based on Modified Achievement Standards (AA-MAS) in 2007
States’ Alternate Assessments Based on Modified Achievement Standards (AA-MAS) in 2007

In collaboration with:
Council of Chief State School Officers (CCSSO)
National Association of State Directors of Special Education (NASDSE)
States’ Alternate Assessments Based on Modified Achievement Standards (AA-MAS) in 2007

Sheryl S. Lazarus • Martha L. Thurlow • Laurene L. Christensen • Damien Cormier

December 2007

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Executive Summary

In April 2007, No Child Left Behind regulations were finalized that gave states the option to develop an alternate assessment based on modified achievement standards (AA-MAS). This assessment option is for a small group of students with disabilities who can make significant progress, but who may not reach grade-level achievement within the time period covered by their Individualized Education Program (IEP) (U.S. Dept. of Education, 2007). Prior to the finalization of this regulation a few states had developed, or were developing, an assessment they considered to be an AA-MAS—though none had yet been through the U.S. Department of Education’s peer review process. This study compiles and summarizes publicly available information about these assessments.

In July 2007 five states—Kansas, Louisiana, North Carolina, North Dakota, and Oklahoma—had an assessment they considered to be an AA-MAS. In addition to these states, Maryland had information on its state Web site about an AA-MAS that was under development and designated to be implemented during the 2008-09 school year at the earliest. Most states with this assessment option used a multiple-choice test; sometimes, there was also a writing prompt or items that required a constructed response. One state had a portfolio assessment.

The eligibility criteria for the AA-MAS differed across states, but all states required the student to have an IEP. Other criteria that many states included were: decision not based on categorical label; student does not have significant cognitive disabilities; student performance level is not due to excessive absences or to social, cultural, environmental, or economic factors; and student is learning grade-level content.

States’ AA-MAS’s differed in a number of ways from their regular assessments. For the AA-MAS, some states removed a distractor, had fewer items, had shorter passages, or used simplified language. States often incorporated some accommodations into the design of the AA-MAS. The ones mostly frequently incorporated were larger font size and fewer items per page.
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Overview

Federal legislation requires that all students, including students with disabilities, be included in all state and district-level accountability systems. Many students can take the regular assessment with or without accommodations, but some students with disabilities need alternate ways to access assessments. For the past several years, states have had alternate assessments based on alternate achievement standards. In April 2007 No Child Left Behind (NCLB) regulations on modified achievement standards were finalized. These regulations were designed to give states additional flexibility.

As described in the regulations (U.S. Department of Education, 2007), states have the option of providing an alternate assessment based on modified achievement standards (AA-MAS). Students who participate in this assessment may be from any disability category. Their progress to date, in response to appropriate instruction, must be such that the student is unlikely to achieve grade-level proficiency within the year covered by the IEP. The regulations require that students who participate in this option have access to grade-level content. Several states had an alternate assessment based on modified achievement standards in place, or in development, prior to the regulations that they believe meet the criteria of an AA-MAS—even though none have yet been through the peer review process used by the U.S. Department of Education to determine whether the assessment fulfills the necessary requirements for the state to receive Federal funds.

The purpose of this report is to provide a snapshot of the characteristics of the AA-MAS in these states at a time shortly after the April 2007 regulations were finalized. Because these states developed their assessments prior to the final regulations, some of the characteristics of these early AA-MAS may not fully comply with the regulations. We did not attempt to determine the degree to which these assessments meet the Federal requirements. Those determinations will be made through the official peer review process that requires states to demonstrate that their assessment systems used for accountability purposes meet certain criteria. To prepare for this peer review process, states compile a set of relevant materials and evidence (e.g., state statutes and regulations, test administrator manuals, assessment reports, etc.). The peer reviewers examine this evidence under the guidance of a U.S. Department of Education staff member. The Assistant Secretary for Elementary and Secondary Education uses the peer reviewers’ comments to make decisions about approval of a state’s assessment system.

The landscape of AA-MAS development is changing rapidly, and we anticipate that additional states may have an AA-MAS soon. It is possible that some other states have a version of an AA-MAS that is not yet public. Some states may be considering the development of an AA-MAS; others may be field testing items. This study addressed only those AA-MAS for which public information was available in July 2007.
Specific questions that we sought to answer in this study included:

1. In July 2007 which states either had an assessment that they considered to be AA-MAS or had information about an AA-MAS in development on their Web site?

2. What were the characteristics of these assessments?

3. What were the eligibility criteria for students to qualify to participate in this assessment option?

**Process Used to Find Information About States’ AA-MAS**

This report summarizes publicly available information about the characteristics of the AA-MAS for states that either had one in place in July 2007 or had information about an AA-MAS in development on the state Web site in July 2007. Data were gathered from state Web sites as well as from presentations at the Council of Chief State School Officers’ (CCSSO) Large-Scale Assessment Conference in Nashville, Tennessee in June 2007. Several states made presentations at the conference on their AA-MAS and their PowerPoint slide handouts were used as a data source. Appendix A contains a list of the documents used to compile the information in this report. AA-MAS information was collected for each state and placed into a state profile. The profiles were then e-mailed to each state in September 2007. States were asked to verify the information; if the profile contained inaccurate information, states were permitted to revise their profiles. We then compiled and summarized the verified information in this report.

**Results**

As indicated in Table 1, five states—Kansas, Louisiana, North Carolina, North Dakota, and Oklahoma—had an assessment that they considered to be an AA-MAS. In addition to these states, Maryland had information on its Web site about an AA-MAS under development. Some states had developed their AA-MAS for more grades and content areas than others. For example, grade 4 was the earliest grade at which the LAA 2 (LEAP Alternate Assessment, Level 2) in Louisiana was available; the other five states had an AA-MAS for at least some content areas, starting in Grade 3.

The six states that had, or are developing, an assessment that they believed to be an AA-MAS, differ from one another. As shown in Figure 1, one state—North Dakota—had a portfolio assessment, while the other five states had a multiple-choice assessment. One state’s assessment also included some constructed responses; two states had a writing prompt. Additional details about the types of assessments are available in Appendix B in Table B-1.
### Table 1. AA-MAS Name, Content Areas, and Grade Described by State

<table>
<thead>
<tr>
<th>State</th>
<th>Assessment Name</th>
<th>Content Areas/ Grades</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kansas</td>
<td>KAMM (Kansas Assessment of Multiple Measures)</td>
<td>Reading (3-8; once in HS); Math (3-8; once in HS); Writing (5,8, once in HS); History/Gov (6, 8, once in HS); Science (4,7, once in HS)</td>
</tr>
<tr>
<td>Louisiana</td>
<td>LAA2 (LEAP Alternate Assessment, Level 2)</td>
<td>English (Grades 4-10); Math (Grades 4-10); Science (Grades 4, 8 and 11); Social Studies (Grades 4,8,11)</td>
</tr>
<tr>
<td>Maryland</td>
<td>Mod-MSA (Modified Maryland School Assessment) and Mod-HSA (Modified High School Assessment)</td>
<td>Reading/ELA (3-8, HS); Mathematics (3-8, HS)</td>
</tr>
<tr>
<td>North Carolina</td>
<td>NCEXTEND2</td>
<td>Reading (Grades 3-8); Math (Grades 3-8); Science (Grades 5 and 8)</td>
</tr>
<tr>
<td>North Dakota</td>
<td>North Dakota Alternate Assessment Aligned to North Dakota Content Standards for Students with Persistent Cognitive Disabilities</td>
<td>Reading (3-8, 11); Math (3-8,11); Science (4,8,11)</td>
</tr>
<tr>
<td>Oklahoma</td>
<td>CARG-M (CARG=Curriculum Access Resource Guide)</td>
<td>ELA/Reading (Grades 3-8, HS); Math (Grades 3-8, HS); Science (Grades 5 and 8)</td>
</tr>
</tbody>
</table>

1 Still under development. Maryland planned to implement its AA-MAS in 2008-09 at the earliest.

### Figure 1. Number of States with Selected Assessment Types and Question Characteristics

![Bar Chart](chart.png)

- **Portfolio**: 1 state
- **Multiple Choice**: 5 states
- **Constructed Response**: 1 state
- **Writing Prompt**: 2 states
Eligibility Criteria

States with an assessment they considered to be an AA-MAS had eligibility criteria that IEP teams use to determine which students qualify to participate in this assessment option. Some states had developed decision trees, while others had checklists or descriptions of the eligibility criteria. Table 2 shows that all six states in this study required that a student have an IEP to be a candidate for this assessment option. Other frequently listed criteria included: student multiple years behind grade level expectations (n=4); not based on student’s categorical label (n=4); student does not have significant cognitive disabilities (n=4); and not due to student’s excessive absences or to social, cultural, environment, or economic factors (n=4).

Table 2. Number of States with Selected Eligibility Criteria

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Number of States</th>
</tr>
</thead>
<tbody>
<tr>
<td>Student has IEP</td>
<td>6</td>
</tr>
<tr>
<td>Student's performance multiple years behind grade level expectations</td>
<td>4</td>
</tr>
<tr>
<td>Participation decision <em>not based</em> on student’s categorical label</td>
<td>4</td>
</tr>
<tr>
<td>Student <em>does not</em> have significant cognitive disabilities</td>
<td>4</td>
</tr>
<tr>
<td>Student's performance <em>not due</em> to excessive absences or to social, cultural, environmental, or economic factors</td>
<td>4</td>
</tr>
<tr>
<td>Student learning grade level content</td>
<td>3</td>
</tr>
<tr>
<td>Student previously scored at unsatisfactory level on state assessment</td>
<td>2</td>
</tr>
<tr>
<td>Participation decision <em>not based</em> on student’s placement setting</td>
<td>2</td>
</tr>
</tbody>
</table>

1In addition to the eligibility criteria listed in this table, 5 states have other criteria. See Table B-2a for details about these other criteria.

Half of the states (n=3) required that the student must be learning grade-level content, while fewer states required that a student had previously scored at an unsatisfactory level on the state assessment (n=2) or that the decision not be based on student’s placement setting (n=2). Because this group of states had an assessment in place or in development prior to the April 2007 regulation, some states’ criteria may have differed from regulatory requirements. Additional details about the states’ eligibility criteria are available in Appendix B in Tables B-2 and B-2a.

Design Changes

The assessments that states consider to be an AA-MAS differed in a number of ways from the states’ regular assessments. The states made a number of design changes for the AA-MAS. As indicated in Figure 2, four states removed a distractor. For example, if multiple-choice questions on a state’s regular assessment had four possible answer options, then the AA-MAS would have three possibilities. Most states also simplified the language (n=4) and had fewer items (n=4) on
the AA-MAS than on the state’s regular assessment. Three states had shorter reading passages, while one state segmented reading passages so that questions directly followed the section of the passage to which they referred. Examples of other design changes included shorter responses to the writing prompt and the requirement that all of the items be Depth of Knowledge (DOK) levels 1 or 2. The latter requirement refers to methodologies that can be used to organize the level of understanding required for various topics or items. The higher the level, the deeper the level of understanding needed. Table B-3 in Appendix B contains state specific information as well as details about the other changes.

Figure 2. Selected Design Changes in States’ AA-MAS

Accommodations

Some states had incorporated features that would be considered an accommodation on the state’s regular assessment into the design of the assessment considered by the state to be an AA-MAS (see Figure 3). Several states had fewer items per page (n=3). In some states the regular math assessment had one or more sections where the calculator may not be used except if a student has that accommodation listed on the IEP. Two such states incorporated the use of a calculator into the AA-MAS assessment design. Other accommodations incorporated into the assessment design included larger font size (n=3), breaks as needed (n=2), and key text underlined or bolded (n=1). More detailed state specific information about accommodations incorporated into the design of these assessments is presented in Appendix B, Table B-4.
In July 2007 six states had an assessment either in place or in development that they considered to be an AA-MAS, but none had as of yet gone through the U.S. Department of Education’s peer review process. This study compiled and summarized information about these assessments. Key findings included:

- For its AA-MAS, most states had multiple-choice test formats. Sometimes, there was also a writing prompt or items that required a constructed response. One state had a portfolio assessment.

- The eligibility criteria for the AA-MAS differed across states, but in all states students were required to have an IEP to qualify for this assessment option. Other criteria that many states had included the following: decision cannot be based on a categorical label; student does not have significant cognitive disabilities; student’s low performance is not due to excessive absences or to social, cultural, environmental, or economic factors; and student is learning grade-level content.

- States’ AA-MASs differed in a number of ways from their regular assessments. For the AA-MAS, some states removed a distractor, had fewer items on the AA-MAS, had shorter passages, or used simplified language.
• States often incorporated some accommodations into the design of their AA-MASs. The ones mostly frequently incorporated were larger font size and fewer items per page.

Now that the regulations for alternate assessments based on modified achievement standards are final, more states are considering the development of an AA-MAS. The population of students for whom this policy applies is a small group of students with disabilities who can make significant progress, but who may not reach grade-level achievement within the time frame covered by their IEP (U.S. Dept. of Education, 2007).

Important considerations for states that are exploring this option include consideration of how to identify who the students are that might participate in this option, how the students access grade-level content, and how the students show what they know (National Center on Educational Outcomes, 2007). According to Marion (2007), states need to be “prepared to build a defensible validity argument in support of this assessment and in particular should be prepared to address validity issues related to potential unintended negative consequences as a result of implementing this assessment (e.g., lower expectations)” (p. 5). For example, states need to consider, “How will the inclusion of the AA-MAS as part of the state’s assessment system lead to better instructional and curricular opportunities for these students? Whatever benefit (e.g., positive consequential evidence) for these students should be weighed against potential benefits from other approaches such as more appropriate accommodations and especially targeted instructional interventions” (p. 5).

In this report we make no evaluative comments about the various approaches to AA-MAS that states have taken. For information about relevant research, refer to the NCEO Web site at http://www.nceo.info. This report provides information about the characteristics of some of the first state assessments that may be an AA-MAS, but we anticipate that this report is merely the first snapshot of a rapidly changing landscape since it is anticipated that more states will develop an AA-MAS.


**Appendix A: State Documents Used in Analysis**

State documents and presentations used in the analysis of states’ alternate assessments based on modified achievement standards.

<table>
<thead>
<tr>
<th>State</th>
<th>Document Title</th>
<th>Date(s)</th>
<th>Description</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Mathematics-Grades 4,8,10, Science and Social Studies-Grade 11. Retrieved from</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Council of Chief State School Officers (CCSSO) Large Scale Assessment</td>
<td></td>
<td>TN, June 17-20.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>the Use of Accommodations for Instruction and Assessment. Baltimore: Author.</td>
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<tr>
<td>State</td>
<td>Source</td>
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<tr>
<td>---------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
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</tbody>
</table>
## Appendix B: AA-MAS Characteristics by State

### Table B-1. Assessment Type and Question Characteristics

<table>
<thead>
<tr>
<th>State</th>
<th>Assessment Type/ Question Characteristics</th>
<th>Additional Comments</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>Portfolio</td>
<td>Multiple Choice</td>
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<tr>
<td>Kansas</td>
<td>X</td>
<td></td>
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<tr>
<td>Louisiana</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Maryland</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>North Carolina</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>North Dakota</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Oklahoma</td>
<td>X</td>
<td>X</td>
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</tbody>
</table>

1 Still under development. Maryland planned to implement an AA-MAS in 2008-09 at the earliest. In addition, specific accommodations implemented in these assessment/instructional settings may include: test items are less complex, fewer and shorter passages, shorter or less difficult questions, and fewer distractors.
### Table B-2. Eligibility Criteria

<table>
<thead>
<tr>
<th>Criteria</th>
<th>State</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>KS</td>
</tr>
<tr>
<td>Student has IEP</td>
<td>X</td>
</tr>
<tr>
<td>Student’s performance multiple years behind grade level expectations</td>
<td></td>
</tr>
<tr>
<td>Participation decision not based on student’s categorical label</td>
<td>X</td>
</tr>
<tr>
<td>Student does not have significant cognitive disabilities</td>
<td>X</td>
</tr>
<tr>
<td>Student’s performance not due to excessive absences or to social, cultural, environmental, or economic factors</td>
<td>X</td>
</tr>
<tr>
<td>Student learning grade level content</td>
<td>X</td>
</tr>
<tr>
<td>Student previously scored at unsatisfactory level on state assessment</td>
<td></td>
</tr>
<tr>
<td>Decision not based on placement setting</td>
<td>X</td>
</tr>
<tr>
<td>Other criteria (see Table B-2a for details)</td>
<td>X</td>
</tr>
</tbody>
</table>

<sup>1</sup>Still under development. Maryland planned to implement an AA-MAS in 2008-09 at the earliest.

<sup>2</sup>KS: Consistently requires instruction in prerequisite skills to the grade level indicators being assessed; despite the provision of research-based interventions, the student is not progressing at the rate expected for grade level; classroom achievement and performance is significantly below grade level peers.

<sup>3</sup>LA: Must be functioning at least 3 grade levels below actual grade in English language arts and/or mathematics.

<sup>4</sup>ND: Differentiates between significant and persistent cognitive disabilities. Students with persistent cognitive disabilities would participate in the AA-MAS (e.g., students with significant cognitive disabilities would participate in the AA-AAS).

<sup>5</sup>MD: Requires use of a modified general curriculum that is aligned with Maryland Content Standards for the student’s grade level, but is modified (reduced amount to learn, reduced complexity, reduced output); requires and receives modifications in instruction (examples include: reduced complexity of language, paraphrasing of reading passages, reduced number of test items, reduced amount of content to learn, embedded scaffolding for a written response such as sentence stems, guided response outline, guided questioning to generate response, software such as Co-Writer and Write Outloud, use of a calculator, and spell check).

<sup>6</sup>LA: Not available in Grade 9 because a participation criterion is that the student must score at the unsatisfactory level on the general assessment.
### Table B-2a. Other Eligibility Criteria Specifications

<table>
<thead>
<tr>
<th>State</th>
<th>Other Criteria Specifications</th>
</tr>
</thead>
<tbody>
<tr>
<td>KS</td>
<td>Student needs significant changes in the complexity and scope of the general standards to show progress in the curriculum: requires intensive specially designed instruction; requires intensive individualized supports; requires extensive instruction. Student needs supports that significantly reduce the complexity or breadth of assessment items: requires differentiated content for classroom assessment; needs to show what know differently; accommodations alone do not allow the student to fully demonstrate knowledge.</td>
</tr>
<tr>
<td>LA</td>
<td>May not be determined administratively.</td>
</tr>
<tr>
<td>MD</td>
<td>The student’s IEP must include goals that are based on academic content standards for the grade in which the student is enrolled. There must be sufficient objective evidence demonstrating that the student is not likely to achieve grade-level proficiency within the school year covered by his/her IEP. For the modified Maryland School Assessment (Mod-MSA), the student requires and receives modified academic achievement standards aligned with Maryland Content Standards for the student’s grade-level during assessment and instruction. For the Modified High School Assessment (Mod-HSA), the student requires and receives modified academic achievement standards aligned with Maryland Content Standards/Core Learning Goals for Algebra and/or English 2 during assessment and instruction; at least three consecutive years of individualized intensive instruction in reading and/or mathematics consistent with his/her IEP; not able to attain proficiency at grade level even with the provisions of accommodations based on documented multiple valid and objective measures of student’s progress (or lack of progress).</td>
</tr>
<tr>
<td>NC</td>
<td>Student needs significant changes in the complexity and scope of the general standards to show progress in the curriculum; Requires intensive specially designed instruction; Requires intensive individualized supports; Requires extensive instruction; Student needs supports that significantly reduce the complexity or breadth of assessment items; Requires differentiated content for classroom assessment; Needs to show what know differently; Accommodations alone do not allow the student to fully demonstrate knowledge.</td>
</tr>
<tr>
<td>ND</td>
<td>May not be determined administratively.</td>
</tr>
<tr>
<td>OK</td>
<td>At least three consecutive years of individualized intensive instruction in reading and/or mathematics consistent with his/her IEP; not able to attain proficiency at grade level even with accommodations.</td>
</tr>
</tbody>
</table>

1Still under development. Maryland planned to implement an AA-MAS in 2008-09 at the earliest.
Table B-3. Comparison of AA-MAS and Regular Assessment: Design Changes

<table>
<thead>
<tr>
<th>State</th>
<th>Change</th>
<th>Other Design Changes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Distractor Removed</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Fewer Items</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Fewer Passages</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Segmenting of Passage</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Shorter Passages</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Simplified Language</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kansas</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Louisiana</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td></td>
<td>Writing: Shorter response to writing prompt required. Reading: No poetry. Information Resources: Question placed adjacent to the related resources.</td>
<td></td>
</tr>
<tr>
<td>Maryland(^2)</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>North Carolina</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td></td>
<td>Writing: grades 4 and 7 use same prompts as regular assessment but scored using modified achievement standards.</td>
<td></td>
</tr>
<tr>
<td>North Dakota(^3)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Oklahoma</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td></td>
<td>Writing: Simplify writing prompts; superlatives: avoids use of superlatives (e.g., best/better/most), no change, and likely/closest; all items must be DOK Level 1 or 2. Math: display numbers on all sides of perimeter; avoid having both negative and positive answer choices (4 and -4); use grid for area questions; avoid complicated art; avoid items that ask student to redefine their perception of an object (e.g., fold this object along the dotted line). Science: reduce amount of reading; whenever possible use art instead of text; simplify tables/charts by removing irrelevant rows/columns; put box around formulas.</td>
<td></td>
</tr>
</tbody>
</table>

\(^1\) Only at some grade levels (e.g., upper grades).

\(^2\) Still under development. Maryland planned to implement an AA-MAS in 2008-09 at the earliest.

\(^3\) North Dakota has a portfolio assessment.
### Table B-4. AA-MAS Accommodations and Comparison of Accommodations with Regular Assessment, Selected States

<table>
<thead>
<tr>
<th>State</th>
<th>Assessment Incorporated into AA-MAS Assessment Design</th>
<th>Other Information and Specification Details</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Breaks as Needed</td>
<td>Calculator</td>
</tr>
<tr>
<td>KS</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>LA</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>MD1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NC</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>ND</td>
<td></td>
<td></td>
</tr>
<tr>
<td>OK</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>

1Still under development. Maryland planned to implement an AA-MAS in 2008-09 at the earliest.
APPENDIX J

A Technical Design and Documentation Workbook for Assessments Based on Modified Achievement Standards
A Technical Design and Documentation Workbook for Assessments
Based on Modified Achievement Standards

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Preface

This document represents the current thinking of the Center for Assessment and our colleagues at this point in time. The suggestions and recommendations contained in this workbook have not been endorsed by the United States Department of Education. While we intend for these recommendations to help states develop technically adequate alternate assessments based on modified achievement standards, readers should not infer that these suggestions will guarantee a successful USED peer review outcome. This workbook represents first stage of technical assistance and there will be additional forthcoming more fully developed materials to assist states with the design, implementation, and evaluation of alternate assessments on modified achievement standards throughout the 2007-2008 school year.

Introduction

The U.S. Department of Education (USED) recently promulgated regulations (April 9, 2007) to allow states to assess a limited number of special education students using an alternate assessment based on modified achievement standards (AA-MAS). Researchers, technical assistance providers, and state departments of education have recently begun to develop a good understanding of approaches for evaluating the technical adequacy of alternate assessments based on alternate achievement standards (AA-AAS), those assessments geared for the most significantly cognitively disabled students. A great deal of this progress can be attributed to applying the approaches for assessment design and evaluation outlined in *Knowing What Students Know: The Science and Design of Educational Assessment* (Pellegrino, Chudowsky, & Glaser, 2001) to AA-MAS (Marion & Pellegrino, 2006). Alternate assessments based on modified achievement standards pose many of the same technical challenges as AA-AAS, therefore we propose using the frameworks put forth in Pellegrino, et al. (2001) and Marion and Pellegrino (2006) to organize the technical guidelines and suggestions for the design of AA-MAS.

Validity is Central

As was argued for the design and evaluation of AA-AAS, validity needs to be the central focus of any design decisions for the development of the AA-MAS. Actually, we would take the same position for the design of any assessment or accountability system, but we focus on the AA-MAS here. Validity should be considered even more prominently in the case of the AA-MAS, because one of the stated reasons for allowing this new assessment system is that the students to be assessed with the AA-MAS have not been validly assessed with the regular grade-level assessment. Given that rationale, it makes sense
that any assessment designed for students designated to participate in the AA-MAS lead to valid inferences regarding their knowledge and skills, and for the evaluation of this assessment to be focused on such validity questions. It is beyond the scope of this brief to outline a full validity argument, but we urge the reader to see Marion and Pellegrino (2006) to see how this framework applies to the alternate assessment for the students with the most significant cognitive disabilities. It will also be important to attend to some of the primary sources of validity thinking to best determine how those apply to the AA-MAS. We think that Kane (2006) and Shepard (2003) would be especially useful.

The Assessment Triangle

We rely on Knowing What Students Know (KWSK) to frame our design and evaluation considerations for the AA-MAS. Knowing What Students Know was built from Mislevy’s (1996) notion of assessment as a “process of reasoning from evidence” (p. 39) and previous National Research Council (NRC) work synthesizing research on human learning (Bransford, Brown, and Cocking, 2000). The authors of KWSK used the heuristic of an “assessment triangle” to illustrate the relationship among learning models, assessment methods, and inferences from assessment scores.

Figure 1. The Assessment Triangle (from Pellegrino et al., 2001, p. 39)

Cognition refers to the empirically-based theories and beliefs about how humans represent information and develop competence in a particular academic domain (Pellegrino et al., 2001). The theories of “learning and knowing” that help explain varying levels of performance in a particular domain are crucial for the design and interpretation of assessments. The observation vertex of the triangle refers to “a set of specifications for assessment tasks that will elicit illuminating responses from students” (Pellegrino et al., 2001 p. 42). The design of items or tasks is based upon the belief that those particular assessment events will allow students to demonstrate their understanding in a given domain, based upon a particular view of learning and knowing. The interpretation component in this diagram includes all of the methods and analytic tools used to make sense of and reason from the assessment observations (Pellegrino et al., 2001). Large-scale assessments rely on statistical models to inform these interpretations and models are designed to describe “patterns one would expect to see in the data given varying levels of student competency” (p. 43).
The Assessment Triangle Applied to Assessments Based on Modified Achievement Standards

We suggest using the assessment triangle heuristic to help us organize the technical considerations involved in designing and evaluating AA-MAS. There are substantial challenges inherent in accurately characterizing the cognition vertex for this group of students. The initial challenge for each state will be describing the learning characteristics of the students eligible to participate in the AA-MAS. This is a necessary first step in designing appropriate assessment experiences for those students. We emphasize the importance of this critical first step for creating a valid assessment design. In other words, a valid assessment must be based on a clear understanding of which students will participate and how those students come to develop competence in the specific domain.

Organization of the Document

After introductory sections about validity, purposes and uses, this workbook is organized according to the vertices of the assessment triangle—cognition, assessment, and interpretations—and is intended to help states work through the design and documentation considerations associated with the implementation of an alternative assessment based on modified achievement standards. We close with a short section regarding some practical considerations about implementing an AA-MAS.

---

1 We know that others are working on documents designed to help state leaders in identifying the group of students eligible to participate in the AA-MAS.
Validity

All of the design and evaluation aspects discussed in this document—and organized according to the assessment triangle—are intended to contribute to creating a more valid AA-MAS. We highlight some of the key validity issues here.

The state should be prepared to build a defensible validity argument in support of this assessment and in particular should be prepared to address validity issues related to potential unintended negative consequences as a result of implementing this assessment (e.g., lower expectations).

Rationale for this Information

Validity is clearly the most important technical criterion for the design and evaluation of assessment systems. The AA-MAS should be designed and implemented to foster more valid score interpretations for students in the “2% population” than has been the case with the regular assessment. In particular, the validity evaluation should focus on the connection among the characteristics of the tested students, the knowledge and skills assessed, and the design of the assessment.

Guiding Questions

1. What is the state’s plan for evaluating the validity of the score inferences for students and schools of the AA-MAS?
   a. What is the state’s plan for systematically evaluating the validity of this assessment for both the short-term (e.g., 1-3 years) and long-term (4-10 years)?
   b. How is this planned approach different from or the same as validation efforts for the regular assessment and AA-AAS?
2. How does this assessment provide a more accurate measure of the knowledge and skills of the participants compared with the regular assessment?
3. How will the inclusion of the AA-MAS as part of the state’s assessment system lead to better instructional and curricular opportunities for these students? Whatever benefit (e.g., positive consequential evidence) for these students should be weighed against potential benefits from other approaches such as more appropriate accommodations and especially targeted instructional interventions.
4. What are the state’s highest priority validity questions related to the AA-MAS?
   a. How does the state propose to evaluate the construct validity of the modified assessment?
   b. How does the state propose answering/addressing these high priority validity questions?
5. The state should also propose studies of response processes (AERA, APA, NCME, 1999) to document that the assessment approaches used with the AA-MAS are a better measure of students’ knowledge of the grade level standards than would be the case with the regular assessment.
6. How will participation in the AA-MAS lead to improvements in the instruction for these students’ in order to improve their likelihood of attaining grade-level proficiency over time?
Purposes and Uses

Purposes of the Assessment System

The state should describe the purposes for developing its AA-MAS. For example, NCLB accountability and IDEA 1997 & 2004 are often key reasons for developing statewide assessment systems that include AA-AAS. Certainly the newly promulgated regulations regarding the AA-MAS support several of the purposes for which these assessments may be used. In addition, there are almost always governing statutes and regulations at the state level and the state may often articulate other purposes of the system (e.g., instructional change).

Rationale for this Information

Validity can only be evaluated in the context of the purposes of the assessment(s) and how the results are used (next section). State leaders should be clear that if a purpose is specified in this section, evidence should be collected to evaluate the validity of the assessment related to this purpose.

Data Sources:

Enabling legislation, design documents, state board minutes, minutes from constituent group meetings (if applicable), and RFP documents are all potential sources of information to document the purposes of the assessment system and the purpose of the AA-MAS within that system. For initial design work, meetings of key stakeholder groups, especially those most familiar with the learning characteristics of the students likely to participate in the AA-MAS, should be convened so the purposes of the developing system can be developed explicitly with the involvement of such key groups.

Guiding Questions:

1. Given all the potential purposes, what are the primary purposes for implementing an AA-MAS?
2. What are the governing statutes providing the legal authority for the AA-MAS?
3. What do these legal documents require in terms of purposes for this test?
4. How are the purposes of the AA-MAS consistent with the purposes of the entire system?
5. How has the state ensured that its AA-MAS will provide coherent information for students across grades and subjects? (Peer Review Guidance p. 3).

Notes
Uses of the Assessment Information

The intended uses of the inferences drawn from the assessment results should be described for individual students, schools, and any other levels for which the results will be used.

Rationale for this Information

Specifying the intended uses of the assessment results is critical for building the validity argument. We validate assessments primarily for the ways in which the results are used and each use needs to have validity evidence to support it.

Data Sources:

Enabling legislation, design documents, state board minutes, minutes from constituent group meetings (if applicable), and RFP documents are all potential sources of information to document how the results of the assessment system are to be used. Additionally, score reports, interpretative documents, professional development workshops can all provide data to describe the uses of the assessment results.

Guiding Questions:

1. Does the state offer guidance to local educators, parents, and other stakeholders about the intended use(s) of the assessment scores?
2. Are there specific requirements for how the scores are to be used?
3. How are the data derived from the assessment system being used (e.g., accountability, program evaluation, instructional feedback)?
4. Has the state provided guidance to prevent inappropriate uses of results?

Notes
Cognition

As discussed above, the cognition vertex of the assessment triangle includes information on the nature of the students involved in the assessment, how they come to develop competent understanding of the knowledge and skills in the content domain and the specific content on which they will be assessed.

Who are the Students?

The state must describe, as completely as possible, the students participating in the AA-MAS. This is crucial for building the validity argument framed around the assessment triangle. The state should present the numbers of students participating in the AA-MAS both according to the nature of their specific disabilities and their relevant learning characteristics. More important than the quantitative information is the information about how these students learn, how they are taught, and what specific features of their learning makes them unlikely to reach proficiency on the regular assessment within the near future.

Rationale for this Information

In order to build a validity argument, we need to have a good understanding of who is participating in the AA-MAS. This is not meant to limit who participates, but simply to gain an accurate understanding of the participants (at least as much as possible).

Data Sources:

- Results of empirical studies and/or other approaches used by the state to describe the students eligible to participate in the AA-MAS.
- State and federal special education data bases indicating the counts of students participating in the AA-MAS by disability code and any other pertinent information may be used.
- Results from demographic data other than disability label that describe characteristics of assessment population are critical sources of information.
- IEP reviews may be a good source of information to gain a better understanding of the learning characteristics of students participating in the AA-MAS.
- To the extent possible, interviews with teachers and parents of students being considered for eligibility should be conducted—at least early in the program—to develop a good understanding regarding the nature of the learning characteristics (and instructional programs) of these students.

Guiding Questions:

1. How many students by specific disability category participate in the AA-MAS?
2. What are the characteristics of the learners that differentiate them from students in the regular assessment?
3. How congruent is the description of the intended population to the actual assessed population?
4. How do these students currently perform on existing academic measures?
5. What is the state’s theoretical rationale for selecting this group of students to constitute the 2% (e.g., those just above the 1% compared with a group of students somewhat higher in the distribution)?

6. How will IEP teams identify these students?
   a. What “multiple valid and objective measures” will be used to identify the students?
   b. How will the information from these multiple measures be combined/weighed in order to contribute to the identification process?

7. Will the AA-MAS be offered for all grades and content areas currently tested?

8. How will states ensure that the identification procedures identify approximately 2% of the students consistently over time within each content area?

9. How are the students participating in the AA-MAS expected to acquire competence in the respective domains?

Notes
What is the Content?

The state must describe, as completely as possible, the content expectations for students participating in the AA-MAS. States will need to thoroughly describe the content and performance expectations for students participating in the AA-MAS to help define the domain for instruction and assessment.

Rationale for this Information

While the AA-MAS is required to be based on the same grade level content standards as the regular assessment, states are permitted to adjust the difficulty of the achievement standard by developing an assessment that is less difficult (but appropriately challenging for the identified group of students) than the regular test. The content and achievement domain must be defined for both instruction and assessment. Instruction is certainly a state and not federal matter, but it is in the state’s and the student’s best interest to focus first on the instructional needs of eligible students. Aspects of the validity argument (e.g., content validity, alignment) cannot be evaluated without these definitions (Peer Review Guidance, p. 4).

Data Sources:

State content and achievement standards (both for the regular and modified assessment), documentation of the processes used to create such standards, and research supporting the design of the standards would all be data sources for this chapter. Further, test blueprints for both the regular and modified assessments would be important information to help define the domain.

Guiding Questions:

1. How is the content of the modified test related to the content on the regular grade-level assessment?
   a. The regulations require the “same grade-level content as the regular assessment. How does the blueprint (in terms of content and cognitive processes) differ, if at all, from the blueprint for the regular assessment?
   b. What is the rationale to support the use of a different blueprint, if applicable?
2. What research was used to support the modification of test blueprint?
3. What guidance will the state provide to support the development of IEPs that are aligned with grade-level content standards for students participating in the AA-MAS?

Notes
Achievement (Performance) Level Descriptors

States may choose to describe the achievement level descriptors in the context of their standard setting discussions, but we argue that because of their critical connection to the definition of an AA-MAS this discussion is a fundamental aspect of the cognition vertex.

Rationale for this Information

The “2% regulations” explicitly state that while the content domain for the AA-MAS is required to be based on the same grade level content standards, it is the achievement standards that may be modified in order to provide a more valid assessment for students in this population. The particular methodology used to derive cutscores on whatever assessment is eventually chosen is far less important than the description of the knowledge and skills associated with each achievement level. The achievement level descriptor is the vehicle for linking the required content with the expected level of performance on the test. These descriptions are crucial for every standards-based assessment, but even more so when we are trying to clarify expectations for a newly-designed assessment system.

Data Sources:

State content and modified achievement standards, documentation of the processes used to create such standards, the qualifications of the key personnel involved in writing the descriptors, and research supporting the design of the standards would all be data sources for this chapter.

Guiding Questions:

1. How will the performance descriptors for the modified achievement standards be developed?
   a. How will they differ from and be related to the performance level descriptors for the regular assessment?
   b. How will states’ current “level/rigor” of achievement standards interact with describing performance levels for the AA-MAS? In other words, how will states with large percentages of students already scoring at the proficient level or above on the regular grade-level assessment find “room” for describing performance for the AA-MAS and still have it be considered “grade level”?

2. What research or other evidence was (or will be) used to support the modification (compared to the regular assessment) of certain achievement expectations?

3. Do the modified achievement level descriptors lead to challenging expectations for the population?

Notes
Observation

A state is responsible for multiple decisions regarding the design, implementation, scoring, and reporting of its AA-MAS. Many of these considerations are similar to those for a regular assessment and are therefore familiar to states. For that reason this document does not go into as much detail regarding the observation vertex of the assessment triangle as for the cognition or interpretation vertices.

Rationale for this Information

Once state assessment teams determine who and what they intend to assess, the next phase involves designing an assessment to fulfill those intentions. Clearly, the various specific design decisions will have implications for how well the assessment can meet the needs of the population the AA-MAS is intended to serve.

Data Sources:

The data/information used to inform the assessment design decisions should come from multiple sources including (but not limited to):

- Minutes from stakeholder group meetings, directions for teachers and/or content advisory groups
- Examples of items and descriptions of the types of expected student responses
- Description of “front-end” alignment procedures
- Results of field /pilot tests
- Results of bias review
- Results of review or consideration of Universal Design
- Theoretical, best-practices, and/or instructional rationale for the selected assessment design

Guiding Questions:

There are many questions that can be used to help guide the development of an assessment system. The following are those that we consider particularly important for the development of an AA-MAS.

1. Are there special considerations regarding item development for the AA-MAS compared to the regular assessment?
2. If the AA-MAS relies on the same item pool as the regular test, how has the state ensured that the existing regular assessment items have an adequate “floor” such that the state will be able to set three cutscores between the existing cutscores and the lower end of the scale measured by this item pool?
3. Will the administration conditions and approaches for the AA-MAS differ from the administration of the regular grade-level assessment? If so, how and why?
4. Will the AA-MAS use the same or different scoring rules and procedures than the regular assessment?
5. What are the unique logistical issues the state must consider in the design and implementation of an AA-MAS?

Notes
Interpretation

The interpretation vertex encompasses those aspects of the assessment enterprise that focus on how we make sense of the scores derived from the assessment events. Topics such as alignment, scaling and equating, standard setting, reliability and reporting typically fall under the interpretation vertex.

Alignment

Alignment, as a technical criterion, has received perhaps the most attention in standards-based education. Alignment among the various aspects of the system—e.g., content, curriculum, assessments, and instruction—is thought to be a requirement for the educational system to function as intended.

Rationale for this Content

This is a legal requirement, but most importantly it is a critical educational requirement to ensure that all students are instructed and assessed on grade-level content, whether their work is evaluated against regular or modified achievement standards.

Data Sources:

- Grade-level content standards
- AA-MAS and regular grade-level test blueprints
- Modified achievement performance level descriptors
- Item specifications or materials used to train item writers

Guiding Questions:

1. What is the relationship between the blueprints for the AA-MAS and the regular assessments? If there is a difference, what is the rationale for this difference?
2. How will the state evaluate the alignment of the AA-MAS with the grade-level content standards—what protocol(s) will be used and the rationale for this choice?
   a. How will the state adapt, if at all, the typically-used alignment criteria for such components as depth of knowledge and range of knowledge to meet the needs of the AA-MAS?

Notes
Scaling and Equating

The state should discuss the methods and results for ensuring comparability among scores from this assessment within and across years. We assume that most modified assessments will report scores on the same scale as the regular assessment, but that is not necessarily a requirement or expectation. The state should describe the choice of scale, the rationale for the choice, and methods for transforming the raw scores into scale scores.

Additionally, the state should describe how it intends to ensure the comparability of score inferences across different forms of the test. Typically, this involves linking or equating, but it could include other forms of establishing the comparability of score inferences (e.g., judgmental approaches).

Rationale for this Content
If a single assessment score is a sample of behavior from which we would like to generalize to a larger domain, then we need to have some way of ensuring the comparability of score inferences from tests that are supposed to be tapping the same domain. This could mean different forms of the test administered to different students whether in the same year or across years. Depending on how the AA-MAS is constructed, this could also involve ensuring the link between the AA-MAS and the regular assessment.

Data Sources:
- Test scores and distributions, scale choice, and transformational methods.
- Item-level information and complete score distributions from multiple forms of the assessment
- Descriptions of the tasks, responses, and judgments.

Guiding Questions:
1. Will the item calibration approaches and scaling procedures differ from the procedures used for the regular assessment? This is especially critical for approaches where the number of distractors is reduced or items are selected from a subset (less difficult) of the item pool.
2. How will the scores on the AA-MAS be linked across years and to the regular grade-level assessment if applicable? How will the validity of this linking be judged?

Notes
**Standard Setting**

The state needs to provide a description of the methodology used to set cut scores, the reason for choosing this method(s) and for not selecting other methods.

**Rationale for this Content**

This is one of the most visible decisions that a state will make and it is crucial to provide a clear rationale for and clear description of the specific methodology selected, especially considering that the achievement standards are the primary means of flexibility for the AA-MAS. Documentation of the standard setting process is required (Peer Review p. xx) including: the selection of judges, methodology employed, and final results.

**Data Sources:**

- Student scores and frequency distributions
- Literature reviews to support methodological choice
- Item difficulty and item mapping information (depending on method)
- Student work samples (depending on method)
- Materials used to train the panelists
- Impact data and final recommended cut scores

**Guiding Questions:**

1. What method(s) will the state use to establish cut scores to validly reflect the performance level descriptors?
   a. Are currently documented standard setting procedures sufficient or will new approaches/modifications be required?
   b. What should the relationship be between the scores/achievement level on the AA-MAS and the regular grade-level assessment? In other words, should there be some type of mapping/linking so that we can relate judgmentally or empirically the scores from the AA-MAS to the regular assessment?

**Notes**
Reliability

The state should discuss the methods and results of analyses designed to characterize the measurement (broadly speaking) and sampling errors associated with test scores.

Rationale for this Content

The level of the educational system for which the scores will be used will dictate the types of reliability/consistency analyses necessary. For example, if the student level results are limited to serving as another source of information about the student, then traditional reliability/measurement error analyses are much less important than school- or district-level decision consistency analyses. However, much of the rationale for designing an AA-MAS is to enable states to provide a more valid assessment for students in the “2% population”, so it is highly likely that states will want to provide reliable student-level information.

Data Sources:
- Data files of student-by-item responses
- Results of inter-rater reliability studies (if applicable)
- Data documenting the variability of performance across occasions
- Business rules for school-level accountability calculations

Guiding Questions:
1. How will the state evaluate the measurement error associated with scores on the AA-MAS?
   a. How do issues of restriction of range of test scores and restricted population interact with the measurement error evaluation? Does the state plan to make any adjustments to its reliability calculations as result of these restrictions?
2. What decisions—and at what level of the educational system—are made as a result of the assessment scores?

Notes
Reporting

The reporting section descriptions should align with purposes and uses described earlier. We anticipate that reports of AA-MAS performance will be included as a component of the assessment system reports. The process for determining the appropriate way to report the results of the AA-MAS should be described including the extent to which stakeholders were involved in the process. The information that schools and parents receive should be provided in this section. The extent to which reports for various constituencies adhere to the Standards for Educational and Psychological Testing (AERA, APA, NCME, 1999) should be described here. Summary scores of students, schools, and other stakeholders should be described.

Rationale for this Information

Reporting is often the last aspect of the assessment system to which we attend, yet is the most important vehicle for communicating about the assessment system to the public. Communicating about the AA-MAS will be a challenge because it is not an assessment with which many people will be familiar. Therefore, considerable attention should be devoted to the design of the reports and associated interpretation materials in order to facilitate the most effective communication possible.

Data Sources:
- Stakeholder meeting reports
- Reporting procedures from RFP
- Score interpretation guides
- Student, school data
- Parent letters
- Sample reports at the student and school levels

Guiding Questions:
1. How will the scores on the AA-MAS be reported?
   a. Will the same reporting scale be used as is used for the regular grade-level assessment?
   b. Will the achievement levels have the same names as the regular assessment? If so, how will it be communicated that these students participated in the AA-MAS?
   c. Will the report format be the same or different from the regular grade level test?
2. What constituencies receive reports?
3. What is the critical information that should be shared?
4. What level of student data may be reported and at what levels may these data be reported?
5. Do the reports comply with the recommendations found in the Standards for Educational and Psychological Testing (AERA, APA, NCME, 1999)?
6. What information should be included to ensure understanding by a non-technical audience and guard against inappropriate interpretation of results?

Notes:
Practical Issues

Finally, we raise some practical considerations. We are aware that these financial and logistical concerns are not necessarily part of technical design conversations, but anyone familiar with large-scale assessments knows that without attending carefully to these practical issues, the best laid technical plans can get derailed quickly.

Few states are likely to have budgeted for the expenses of developing a separate “2%” test. As states attempt to fund such efforts, it may be tempting or even necessary to underfund some of the technical steps outlined throughout this document. While states will continue to receive assessment development funds through NCLB, most approaches for developing and implementing an AA-MAS will require an infusion of state or other funds. For example, many of the approaches being used by states currently rely on using the same item pool as the regular assessment. This might appear to represent a considerable cost efficiency—and there can certainly be an item development cost savings—but other aspects such as equating, form development, report, and standard setting will have to be paid for as if another grade-level test was being added to the state assessment system.

Adding a separate 2% test will present some logistical challenges that must be considered. Managing an expanding testing program (especially with science becoming part of the mix) for most states does not come with a comparable increase in staff and other resources. We know that state departments of education are already stretched thin and adding another set of assessments, especially one with much of the technical uncertainty surrounding the AA-MAS can “break the camel’s back. States will need to evaluate their capacity to design, develop, and implement the AA-MAS before heading off down that road. For example, states must still return data to meet existing AYP reporting and school improvement deadlines. Adding another set of tests for each grade can create significant challenges with meeting these ambitious deadlines. For state leaders who feel like they must try to develop an AA-MAS, there is no requirement that it be implemented for all content areas and grades as the regular assessment. Experimenting with the AA-MAS at a few select grade-content area combinations would be a sensible initial step.

Finally, as mentioned in the validity section, states must weigh whatever benefits accrued to students as a result of implementing an AA-MAS must be weighed against other strategies for improving the educational success of the students eligible for the AA-MAS. Implementing an additional large-scale assessment program will not lead to improvements in the real education opportunities and success of these “2% students” without systematic and targeted instructional interventions. States must ensure that these most important aspects of the educational system are in place prior to or at least along with implementing an AA-MAS.
APPENDIX L

Writing Modified Achievement Level Descriptors

http://www.nniea.org/publications/OS011608_MAP08.pdf