

Docket ID ED-2016-OESE-0047:

Elementary and Secondary Education Act of 1965, as Amended by the Every Student Succeeds Act – Innovative Assessment Demonstration Authority

Comments due no later than September 9, 2016

(4) Provide for comparability to the State academic assessments under section 1111(b)(2) of the Act, including by generating results that are valid, reliable, and comparable for all students and for each subgroup of students under section 1111(b)(2)(B)(xi) of the Act, as compared to the results for such students on the State assessments. Consistent with the SEA's or consortium's evaluation plan under § 200.78(e), the SEA must plan to annually determine comparability during each year of its demonstration authority period...

81 FR 44974

The requirement to annually determine comparability between any innovative assessments and the State academic assessments is unduly burdensome and unnecessary.

The State academic assessments must be of high technical quality which includes the expectation of test score equivalence between test forms both within and across test administrations. Evidence to support the consistent meaning of test scores for the State academic assessment is included in peer review. Innovative assessments developed under the demonstration authority in ESSA must also meet the same technical requirements as the State academic assessments. Therefore, any innovative assessment should be expected to produce equated test forms across test administrations. Since innovative assessments are not submitted to peer review until the end of the demonstration period, it is appropriate to require a plan for ensuring a consistent meaning for test scores for any innovative assessments in these regulations including evidence that different forms of the innovative assessment are constructed to equivalently measure the content domain with respect to both the test content and the psychometric properties of the test.

It is absolutely appropriate and necessary to demonstrate comparability between the State academic assessment and any innovative assessments. However, since both the State academic assessment and any innovative assessment must each ensure that the meaning of test scores remains equivalent across forms and across test administrations, there is no need to annually demonstrate this comparability once it has been established. It is appropriate to require a plan to reestablish comparability in the event either assessment system undergoes changes that result in a change in score interpretation.