Oregon's High School Assessment Options: Report and Recommendations

SUBMITTED TO:
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Overview

The Oregon Department of Education (ODE) has been engaging stakeholders for feedback regarding the development and implementation of our State Plan under the Every Student Succeeds Act (ESSA) since 2016. Oregon's ESSA Plan, the result of substantial effort and scrutiny by stakeholders, partners, and staff, was approved by the U.S. Department of Education in August 2017.

The ESSA Standards and Assessment Workgroup convened as part of this effort recommended that ODE research the flexibility defined in ESSA around high school assessment options. This flexibility was in fact not pursued, nor was it ever intended to be applied at the student level. Instead of pursuing the flexibility as defined in ESSA, which allowed for local education agencies to request permission from their state education agency to use a nationally-recognized, college entrance examination district-wide, and for the state to establish criteria to evaluate the requests, ODE made a public announcement in April 2017 that it would pursue a nationally-recognized college entrance examination to replace our Smarter Balanced assessment as Oregon's high school accountability assessment for English language arts and mathematics starting in the 2018-19 school year at the state level. This announcement was followed by a Request for Information (RFI) for potential vendors in May 2017, to which two vendors responded.

An RFI summary was developed by ODE's Assessment Team in June 2017, but was not publicly shared until January 2018 as part of a State Board of Education docket (though the informational topic wasn't publicly discussed until March 2018). The Assessment Team began the process of developing a Request for Proposals (RFP) to move the procurement process forward in the fall of 2017. The RFP development allowed ODE to make more accurate cost projections that made it clear that the originally-published timeline to implement a new statewide assessment by 2018-19 was not feasible. ODE informed the field in January of 2018 that it would not be possible to move forward with the RFP without additional stakeholder support, as well as additional budget allocations from the Legislature. If stakeholder support was present and the Legislature supported funding a switch in Oregon's high school accountability assessment to a nationally-recognized college entrance examination, the earliest possible operational administration would occur in 2020-21.

This report provides an overview of Oregon's discussion surrounding the high school accountability assessment options in five sections, including the initial discussion as part of ESSA in *Section 1*, the RFI summary in *Section 2*, additional stakeholder engagement conducted in the winter and spring of 2018 in *Section 3*, the current state and national perspective on using nationally-recognized college entrance examinations in *Section 4*, and, finally, a summary and recommendations to the Deputy Superintendent of Public Instruction in *Section 5*.

This report is submitted by ODE's Assessment Team, pursuant to the need to provide documentation of additional stakeholder engagement as well as formal recommendations about next steps for ODE's summative high school accountability assessment. The report also elaborates the manner in which staff recommendations respond to stakeholder concerns.

Section 1: ESSA Stakeholder Engagement

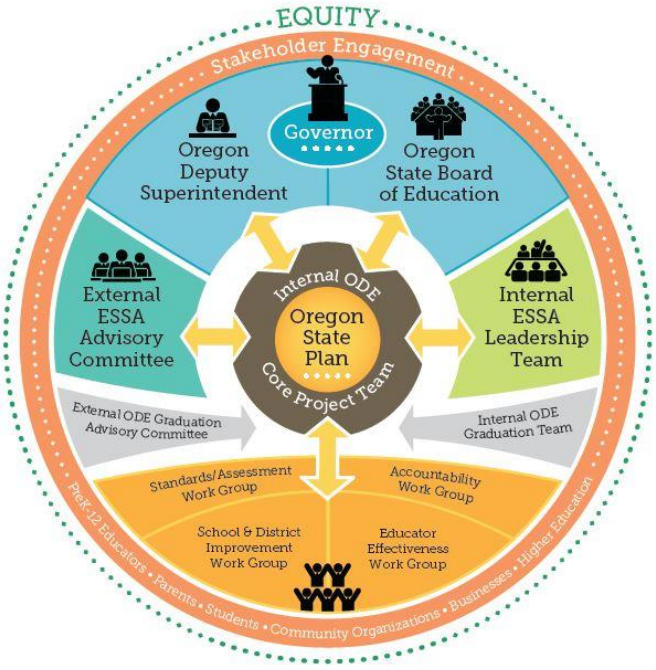
Oregon's Vision for Stakeholder Engagement

The Oregon Department of Education believes that strengthening local partnerships will advance our state's ability to build capacity, empower voices, and make progress towards Oregon's vision to improve educational opportunities and equity, particularly with regard to underserved and underrepresented students and communities.

The partnerships that exist between and among federal, state, and local governmental agencies, like tribes, school boards, and mental health and human service organizations – serve to address misconceptions, empower new voices, and ensure shared ownership for the continuous improvement of our students, schools, and systems. Partnerships encompass those beyond the traditional school day such as before and after school programs, online supports, business and community advocates, culturally-specific organizations, and higher education institutes. To that end, ODE is committed to continuing its engagement with communities, developing resources to support districts, understanding local context and needs, and working together to improve outcomes for every student.

Our Goals for Engagement under ESSA:

1. Articulate and amplify key messages that highlight the state's education priorities as the driver for Oregon's State Plan;
2. Build sustained momentum in support of state priorities;
3. Make significant progress towards a State Plan that is informed by perspectives from across the state;
4. Adhere to Oregon state and ODE policies on tribal consultation and engagement;
5. Galvanize communities across the state to support a shared vision of student success;
6. Provide internal staff the support and resources needed to increase collaboration internally across offices as well as externally with stakeholders, tribal governments, and key partners;
7. Create opportunities for families, communities, and education leaders alike to share input that informs the crafting of the State Plan.



Along with a vision and goals, ODE developed a theory of action and an approach to guide meaningful consultation and overall state plan development in three phases:

- Phase I – Plan and Inform

- Phase II – Targeted Outreach and Public Input
- Phase III – Feedback and Draft Plan

Phase I: Plan & Inform (January-June 2016)
Phase I of our communications and engagement plan was dedicated to establishing a shared vision amongst ODE staff, external stakeholders, and tribal governments, based on the priorities and values of Oregonians. Seeking public input through meaningful stakeholder engagement created an opportunity for the Oregon Department of Education to not only connect with current education advocates, but to seek out those who feel disconnected or who have not been historically engaged in a public education dialogue. In Phase 1, ODE:

- Conducted 13 regional community forum conversations; engaging over 900 Oregonians including educators, school leaders, families, higher education partners, business leaders, and communities. Participants were asked to *Reimagine Education in Oregon* by talking about their hopes, dreams, and aspirations for Oregon's students and schools. The forums generated rich conversation that highlighted the values that anchor this Plan.
    - The community forum conversations illuminated 5 themes, one specifically connected to assessment: *A desire to measure the success of students and schools in multiple ways including academic, social-emotional learning, and the capacity of the school to prepare students for their next steps*. Participants stressed the importance of using measures beyond academic achievement to evaluate student and school success. They stated that school success should gather information about student growth in core academic skills as well as a range of other academic and non-cognitive skills including citizenship, critical thinking, perseverance, and involvement in the variety of offerings outside of academic classes. The participants suggested several measures of school success that provide information about the system and schools that offer services to students, families, and communities. In addition to graduation and attendance rates, they suggested information on educator absenteeism, family engagement, extracurricular activities, curriculum offerings, and supports to students who experience barriers to their education as important indicators of school success. They also encouraged gathering information from students, families, and community members on their perspectives about their school. When participants talked or wrote about "measures of school success" they often expressed the following:
        - **Using multiple measures of student success** including academic performance, attendance, graduation rate, student engagement, proficiency in relevant skills, or the percentage of students entering and succeeding in postsecondary education and career
        - Focusing on **individual student growth and achievement toward their personal goals**
        - **Measures of school quality that go beyond academic achievement** including school climate, staff absenteeism, extracurricular activities,

family engagement, the variety of offerings outside of academics, and support to struggling students

- Supporting the use of **formative assessments** that provide **relevant, immediate, and effective feedback** that informs instruction and supports student learning
- Using data to **identify problems and make adjustments** early for all students and different student groups.

- Established 4 technical work groups that developed recommendations under key areas of flexibility: Standards & Assessment, Accountability, School Improvement, and Educator Effectiveness. Workgroup members were selected based on their broad expertise, geographic representation and racial and ethnic diversity. ODE received over 300 applications from educators, parents, community members, business leaders, community based organizations, higher education, and early learning representatives.
- Three work groups provided recommendations on the English Learner ESSA components: EL Identification, EL Reclassification/Exit, and EL Accountability (see Power Point for information and the composition each of the work groups).
- Appointed an external advisory committee of education practitioners to review and provide input on components of the State Plan. This committee is made up of 45 members who include teachers, principals, superintendents, education partners, community based organizations, and advocacy organizations. The committee convened in-person four times to advise the Deputy Superintendent on critical decision points represented in Oregon's State Plan.
- Collected input on recommendations through conference presentations, feedback sessions, and webinars.
- Communicated high-level information related to ESSA and Oregon's State Plan development timeline with ODE staff and educators through ODE's monthly newsletter called *Education Update.*
- Convened the ODE American Indian/Alaska Native (AI/AN) Advisory Panel and the Tribal Education Cluster (government to government) Members to collect input on AI/AN perspectives.

Phase II: Targeted Outreach (July through December 2016)

Phase II aimed to promote the facilitation of two-way dialogue with targeted groups of stakeholders and tribal governments about key aspects of Oregon's State Plan. Meetings and feedback sessions went deep into exploring aspects of the law and subsequent regulations in the areas of standards and assessment, accountability, school improvement, and educator effectiveness. Some of the topics of these conversations included accountability and reporting indicators and how to ensure we are measuring what we value as a state; the opportunity to fully develop a balanced assessment system and take advantage of flexibility offered at the high school level; the systems in place to support culturally-responsive instruction and the growth and development of our educators; and, providing the necessary supports and systemic change to sustain improvement. In Phase II, ODE:

- Continued its work with the 4 technical work groups to develop recommendations;
- Worked with partner organizations to extend its reach;
- Targeted its engagement efforts to include communities of color, school board members, teachers, students, families, tribal governments, community members, paraprofessionals, specialized instructional support personnel, special education professionals, early learning community members, policy advocates, legislators, and other stakeholders;
- Established a process to review and solicit input relative to the English Learner components of ESSA and Oregon's State Plan;
- Conducted 7 regional community forums in partnership with local education agencies to share components of Oregon's Draft Plan Framework;
- Identified stakeholder concerns, challenges, and barriers to implementing ESSA, including stakeholders' biggest lingering questions, suggestions, and improved recommendations for the State Plan. Continued to seek input from the ODE American Indian/Alaska Native (AI/AN) Advisory Panel and the Tribal Education Cluster (government to government) members on AI/AN perspectives

Through the aforementioned community engagement, ODE received input regarding Oregon's statewide assessment system. This input called out the following values:

- Move toward a more balanced assessment system, with less emphasis on summative testing
- Decrease time spent participating in state accountability assessments
- Address over-testing at the high school level
- Increase the personal relevance for high school students

By the end of Phase II, ODE staff garnered feedback from a broad representation of stakeholders to inform the development of a draft state plan framework. Tables in Attachment 1 represent stakeholders consulted.

Phase III: Feedback and Draft Plan (November through April 2017)
Phase III provides a framework for synthesizing feedback and recommendations from across the state in order to draft and inform the development of Oregon's State Plan. Oregon has committed to a transparent process that articulates how feedback is being used to guide and inform next steps. Starting in Phase I, ODE has:

- Released and posted a comprehensive recap of the thirteen community forums held across the state on its website;
- Generated a summary document following each ESSA Advisory Committee meeting to shed light on the conversation through a thematic approach and share the progress to date with Oregonians;
- Sent out monthly newsletter updates to district Superintendents, administrators, and teachers;

- Synthesized and analyzed data (both quantitative and qualitative) from conference feedback sessions, targeted engagement efforts, and tribal consultation that included a myriad of audiences from legislators, to students, to classified staff, and school board members along the way to write a plan reflective of the constituents served across Oregon;
- Developed a report summarizing the feedback received on proposed recommendations for Oregon's State Plan.
- Synthesized and included input received from conversations with Oregon's 9 federally recognized tribes.
- Synthesized and included the ODE American Indian/Alaska Native (AI/AN) Advisory Panel and the Tribal Education Cluster (government to government) Members' input.
- Worked with the Northwest Comprehensive Center to synthesize, analyze, and report out on the stakeholder input given through a 30-day public comments period on Oregon's Draft State Plan

It is critical to note that submission of Oregon's State Plan to the U.S. Department of Education in May 2017 was not the end of this work. The State Plan acts as a blueprint for the work ahead.

Section 2: Request for Information Summary

Responding to Stakeholder Feedback

As mentioned in *Section 1*, ODE convened stakeholder work groups in the spring of 2016 to represent the diverse perspectives of Oregon communities and students to inform the development of Oregon's state plan under the Every Student Succeeds Act (ESSA). ODE specifically engaged a Standards and Assessment Work Group to:

- Clarify the prioritization and progression of content standards across grade levels to support school and district implementation of content expectations and effective instructional practices to ensure alignment to the standards;
- Consider how best to structure Oregon's statewide assessment system to inform effective instructional practices aligned to the state-adopted standards; and
- Specifically evaluate how best to leverage available flexibility surrounding the high school assessment to promote equitable opportunities and outcomes for all of Oregon's students.

The Standards and Assessment Work Group identified it as a central value that Oregon students deserve an assessment system whose costs in time, energy, and resources are in balance with real benefits to students and educators: timely, usable feedback on learning. In the absence of such benefits, the Work Group urged that we must dramatically reduce the costs in time, energy, and resources of summative assessments for systems accountability. As these benefits increase, more costs may be justified. Over the course of four meetings, the Work Group elevated six recommendations around Oregon's statewide assessment system, which are included in Attachment 2. Two of the Work Group's recommendations focused on Oregon's statewide summative high school assessment summarized below (see Attachment 2 for the full recommendation):

- Recommendation 5 urged ODE to explore flexibility in which summative assessment high school students could use to meet accountability requirements.
- Recommendation 6 urged ODE to develop a process for evaluating potential summative high school assessments for state approval, applying a series of criteria identified by the Work Group to ensure equitable access and benefits for all students.

In response to stakeholder feedback received through both the formal stakeholder work groups and the community engagement sessions described in Section 1 of this report, ODE included the following commitment in Section 3 of Oregon's ESSA State Plan:

> Oregon will pursue the flexibility under ESSA to allow districts to use a nationally-recognized assessment in place of the statewide summative assessment. While this process moves forward, ODE will continue implementing Smarter Balanced until another option is available and determined appropriate for local-selection. ODE will establish a rigorous review process that includes:
>
> - Involvement of key stakeholders
> - Alignment to the learning standards
> - Reliability and validity

- Comparability across schools and districts
- Accommodation and accessibility supports
- Clear performance targets set at appropriate levels

ODE included this language in order to maintain maximum maneuverability as it explored the feasibility of switching high school assessments. Ultimately, the approach that ODE announced in April 2017 was to explore replacing Oregon's current high school summative assessment with another nationally recognized summative assessment statewide, with the original intention to make this statewide switch starting in the 2018-19 school year.

May 2017 Request for Information

As the first step in its pursuit of switching high school assessments, ODE issued a Request for Information (RFI) in May 2017. The purpose of the RFI was to provide information about available assessment options to inform ODE's and stakeholders' consideration of the feasibility of switching high school assessments. ODE constructed the RFI to elicit information from vendors about available assessments' ability to meet federal requirements under ESSA as well as to meet the following criteria explicitly identified by the Standards & Assessment Work Group:

- Prospective assessments must provide *all* students with access to the same suite of accessibility supports offered through the current statewide summative assessments.
- Prospective assessments must ensure that students who test using accessibility supports will not be penalized in any way and will not have their results treated differently for any applications outside of meeting state and federal accountability requirements.
- Prospective assessments must offer a benefit for *each* student taking the test (e.g., providing students with detailed feedback and links to resources, eligibility for college admissions or placement, eligibility for scholarships) without differential treatment.
- Prospective assessments must ensure that assessment results are clear and reported in a timely manner to all interested parties.
- Oregon will ensure that options provide a direct benefit to the student beyond meeting graduation requirements. (i.e. college admissions, college and CTE credit, college placement, etc.)

This RFI closed on June 8, 2017; two vendors responded to the RFI: ACT and the College Board. Attachment 3 contains a summary of vendor responses to the RFI, and Attachment 4 contains the RFI issued by ODE. (Note: while the RFI included math, English language arts (ELA), and science, subsequent decisions narrowed the focus of the potential procurement process to math and ELA; therefore, the summary of responses in Attachment 3 focuses on vendor responses related to math and ELA assessment offerings.)

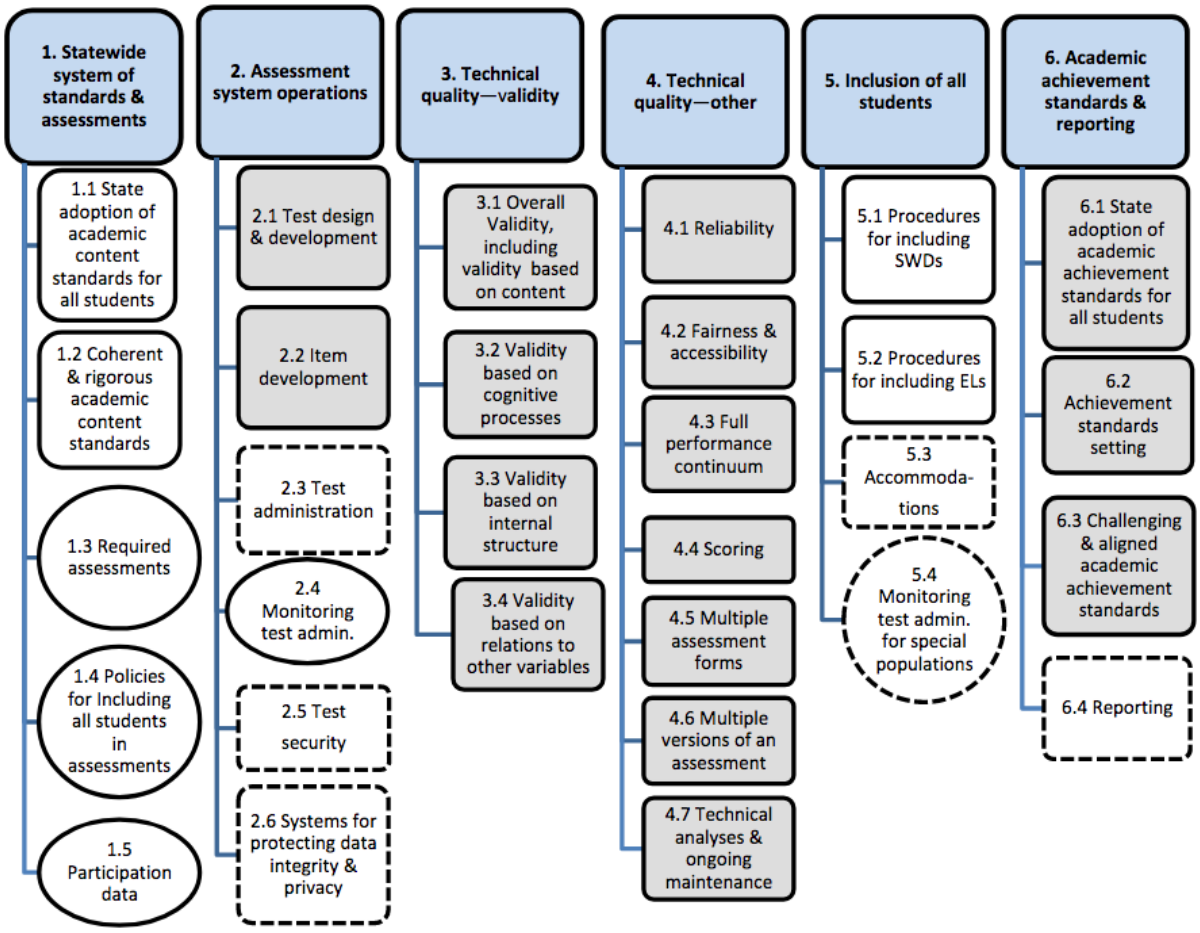
ODE staff's analysis of the vendor responses to the RFI identified the following considerations that would need to be addressed should Oregon switch its statewide high school summative assessment:

- Alignment to Oregon's adopted content standards for Math and English language arts and criterion-referenced score reporting, as established in ORS 329.485
- Accessibility for *all* of Oregon's high school students, including students from historically underserved populations, students with IEPs/504s, and English learners
- Compliance with ESSA and IDEA requirements about identifying accommodations for students on an IEP or 504 Plan
- Equity: college-reportable results for *all* students, including those who test with state-approved accommodations
- Time: logistical considerations around test scheduling and administration
- Cost: both initial implementation costs, as well as long-term costs for implementation and improvement
- Essential Skills: implications for the Essential Skills graduation requirement

Alignment to Oregon's Adopted Content Standards

State law requires ODE to implement a valid and reliable assessment system for all students statewide that meets test development technical adequacy standards, as elaborated by the Title 1 Statewide Assessment System Peer Review process. The Peer Review process requires state departments of education to submit evidence in six areas, which are called Critical Elements (CEs): 1) Statewide system of standards and assessments; 2) Assessment system operations; 3) Technical quality – validity; 4) Technical quality – other; 5) Inclusion of all students; and, 6) Academic achievement standards and reporting. A visual display of these six CEs and their subsections is provided on the next page for reference:

Map of the Critical Elements for the State Assessment System Peer Review



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Critical elements in ovals will be checked for completeness by Department staff; if necessary, they may also be reviewed by assessment peer reviewers (e.g., Critical Element 1.3). All other critical elements will be reviewed by assessment peer reviewers.

Critical elements in shaded boxes likely will be addressed by coordinated evidence for all States administering the same assessments (e.g., Critical Element 2.1).

Critical elements in clear boxes with solid outlines likely will be addressed with State-specific evidence, even if a State administers the same assessments administered by other States (e.g., Critical Element 5.1).

Critical elements in ovals or clear boxes with dashed outlines likely will be addressed by both State-specific evidence and coordinated evidence for States administering the same assessments (e.g., Critical Element 2.3, 5.4).

States submit substantial evidence of each CE as part of the evaluation process, typically every three years. The US Department of Education (USED) contracts with national experts in measurement, students with disabilities, English learners, and accountability to review this evidence, called "peer reviewers," and determine whether the state's documentation is sufficient or if additional effort is needed to support the intended uses of the assessment system. States that do not meet expectations established by the CEs are subject to monetary

withholdings at rates that have ranged from 5-25% of a state's Title 1 administrative funds; the USED has actually withheld funds 10 times from 2002 to 2009 (USED, personal correspondence, 4-12-18).

The evidence a state submits in section 3.1 and 3.2 must demonstrate that a state's assessment aligned to the full depth, breadth, and complexity of the state's adopted content standards. The state must be able to provide evidence from a third party evaluation of standards alignment in order to meet federal peer review requirements. The submission of evidence completed by the state education agency or the test vendor is thus inadmissible (as it is clearly subject to confirmation bias).

While both ACT and the College Board asserted in their RFI responses that their assessments align to Oregon's adopted content standards, neither vendor provided or referenced the availability of third party evidence demonstrating alignment. ACT's claim of alignment cited that, "there is significant overlap between the Common Core State Standards and the college and career readiness skills that ACT measures. ACT tests are designed to measure student preparedness to achieve their academic and workplace goals" (ACT Response to May 2017 RFI). Similarly, College Board's based its claim of alignment by stating: "The [SAT] is a profoundly meaningful assessment that is thoroughly transparent and aligned to critical high school outcomes, best instructional practices, and the Oregon state standards."

Furthermore, Oregon statute requires that the assessment system shall include criterion-referenced assessments including performance-based assessments, content-based assessments, and other valid methods to measure the academic content standards and to identify students who meet or exceed the standards. (ORS 329.486).

In response to the RFI question regarding whether the vendor's assessment is criterion-referenced, both vendors responded affirmatively. However, neither vendor's response indicated an accurate understanding or provided evidence demonstrating that their assessments were in fact criterion-referenced. Criterion-referenced assessments are designed-forward to compare student achievement to levels of mastery, while norm-referenced assessments compare student performance to other students. As an example, 100% mastery is a desirable outcome for a criterion-referenced, or standards-based, assessment. Norm-based assessments are relative, so whatever achievement or gains are made are relative to the performance of other students. ACT responded that, "the ACT is a nationally normed, criterion-referenced college and career readiness assessment. A criterion-referenced interpretation of ACT scores is obtained through the application of ACT's College Readiness Benchmarks. Students, parents, and counselors can use the Benchmarks to determine the academic areas in which students are ready for college course work, and areas in which they may need more work." Likewise, College Board indicated that, "each assessment in the SAT suite has an associated set of metrics called the college and career readiness benchmarks. The new college and career readiness benchmarks are based on actual student success in entry-level college courses."

Accessibility

Accessibility supports, evidence of which is required in sections 5.1, 5.2, and 5.3 within the Peer Review submission, have the purpose of providing access to the assessment and should match the accessibility supports the student uses in his or her instructional experience. The Standards and Assessment Work Group expressed a strong value in ensuring that all Oregon's statewide summative assessments used for accountability purposes must provide all students with access to the same suite of accessibility supports offered through Oregon's current statewide summative assessment.

Both ACT's and the College Board's RFI responses indicate that their accessibility offerings are more limited than Oregon's current statewide high school summative assessment, which currently includes 54 supports, most of which are available to any student (a small subset of accommodations are available only to students on an IEP or 504 Plan). Moreover, the RFI responses indicate that the vendors apply a more restrictive process for approving the use of offered accessibility supports compared with ODE's current practices. Oregon's current accessibility policy includes three tiers of support:

- Universal tools: available to all students based on student preference and selection
- Designated supports: available for use by any student for whom the need has been indicated by an educator (or team of educators working with the parent/guardian and student)
- Accommodations: available only for students with documented Individualized Education Programs (IEPs) or Section 504 Plans

Whereas universal tools and designated supports (which make up the vast majority of Oregon's current 54 supports) are available to all students with no specific eligibility or documentation criteria in place, both vendors indicated in their RFI responses that the decision to provide a student with accessibility supports are largely offered only to students with disabilities and are subject to vendor approval. Furthermore, both vendors indicated that in many cases, tests administered using state-approved accessibility supports would not result in a college-reportable score. ACT's and the College Board's RFI responses do not comply with OAR 581-015-2035 that resulted from the 2013 legislative session which requires the provision of sign language interpreter support for students who are deaf or hard of hearing when participating in the statewide summative assessments. Finally, Oregon Administrative Rule 581-022-0620 requires ODE to provide translated assessments for languages that are the language of origin for at least 9 percent of Oregon's student population for grades K – 12. To meet this requirement, ODE's current statewide summative math assessment offers a full Spanish translation and the option for students to respond to constructed response items in Spanish. While ACT's RFI response indicated that they could provide a full Spanish translation at an additional cost beyond their per-student cost, the College Board's RFI response stated that no such translation was available, with only a word-to-word glossary option approved for English Learners. Neither vendor's response indicated an option permitting students to respond in Spanish. Shifting to an assessment that removes the full Spanish translation support currently

available to Oregon's Spanish-speaking English Learners presents concerns about how English Learners would have equitable access to the required statewide assessment.

Compliance with ESSA and IDEA Requirements

It is unclear what vendors might be responsive to an eventual Request for Proposals (RFP) if that path is selected. At present, no nationally recognized high school academic assessment has met USED's Peer Review requirements. Current evidence suggests that ODE is correct to maintain a cautious approach to this potential shift, as misalignment, limitations regarding information about and provision of accessibility supports, and timing/scheduling challenges suggest that compliance with sections 3.1, 3.2, 5.1-5.3 within ESSA is at least questionable. In addition, Individualized Education Program (IEP) teams, 504 teams, and EL planning teams would not have complete information about which accommodations do/do not violate the construct in the eyes of the vendor and thus lead to a non-college-reportable score.

Equity

Related to accessibility, the Work Group strongly urged that Oregon's statewide summative assessment must ensure that students who test using these accessibility supports are not penalized in any way and do not have their results treated differently for any reason, and that Oregon's statewide summative assessment must offer a benefit for each student taking the test without differential treatment. Contrary to this recommendation, both vendors indicated that tests administered with certain accessibility supports may not be college reportable. Furthermore, both vendors indicated that they conduct their approval process on a case-by-case basis, which would make it challenging for IEP teams to make informed decisions about which supports to assign to individual students.

An additional equity concern arises in the context of test preparation resources and tutoring options. These resources are widely available for both the ACT and SAT to students with the financial resources to access those options. Proceeding with procuring such an assessment may therefore have inequitable implications for students without financial resources for multiple opportunities or external preparation options.

Scheduling and Logistical Considerations

Based on the RFI responses submitted by ACT and the College Board, the testing conditions for these other assessments are more restrictive than Oregon's current high school summative assessment in terms of the timing for scheduling test administration and the time allowed for students to complete the test(s). Oregon's current test window allows districts to schedule testing to occur over a five-month test window, with individual test opportunities subject to a 20 – 45 day expiration period, maximizing local flexibility in scheduling and resource allocation and providing individual students the time they need to test at their own pace. By comparison, ACT responded that it would provide an opportunity for ODE to select an initial test date, a make-up test date, and an emergency test date, and the College Board responded that ODE may choose a primary and make up test date, with online test administration occurring over multiple days. In addition, both vendors responded that their tests are timed, meaning that students have a fixed amount of time to complete the test. These challenges could pose

increased difficulty for schools to ensure 95 percent participation—a participation requirement established by the USED to ensure that statewide assessment results reflect how schools are doing at serving all student groups, including those groups that have been historically underserved including Oregon's students of color, students with disabilities, English Learners, and students experiencing poverty.

Cost

ODE staff's evaluation based on the RFI responses indicates that the net biennial cost increase of implementing a new test for high school and discontinuing the current test would be approximately $5.8 – 6.8 million per biennium. In addition to the per-student rate identified by the vendors, this figure includes additional implementation costs, such as standard setting, an independent alignment study, and related activities that are necessary to document compliance with best practices in test development and provide documentation for the Title 1 Statewide Assessment Peer Review process. It does not include costs associated with any item development activities that might ensue should the alignment study indicate gaps in coverage of Oregon's adopted content standards.

Implications for Essential Skills Graduation Requirements

Students are required to demonstrate proficiency in the Essential Skills of Reading, Writing, and Mathematics to earn a Regular or Modified Diploma. The State Board of Education has adopted three primary assessment options by which students can demonstrate proficiency in each of the Essential Skills: the statewide summative assessment; other standardized tests; and work samples (local performance assessments scored using the official state scoring guides). The vast majority of students meet their Essential Skills requirement through the statewide summative assessment. Of the students who graduated in 2015 (in the four-year cohort), 92% of students met the reading requirement through the statewide summative assessment, 67% of students met the writing requirement through the statewide summative assessment, and 81% of students met the mathematics requirement through the statewide summative assessment. Conversely, only 3 – 4% of students met the Essential Skills requirement using another standardized assessment (including the SAT and ACT, among others).

The Essential Skills graduation requirement is a high-stakes policy for students, and the Essential Skills and Local Performance Assessment Manual states that the validity of the assessment results depends on each student having appropriate accessibility supports when needed based on the constructs being measured by the assessment. A student's ability to access the same accessibility supports received in instruction, to work with the school team to determine which day is optimal for the student, and to take as much time as they need to complete the assessment have all been helpful features of the current statewide assessment in reducing the impact of test anxiety. ACT's and the College Board's RFI responses indicate that for their assessment systems some or all of these conditions may be more restrictive. Adopting a nationally recognized assessment such as ACT or SAT as Oregon's statewide high school summative assessment would result in all high school students having a required, state-financed opportunity to receive college-reportable scores. However, both ACT and College Board stated in the RFI responses that the use of certain accessibility supports invalidate results

for college reporting purposes but would not impact federal assessment and accountability purposes. Therefore, despite the opportunity for all students to take the test, the resulting scores for some students who test with certain accessibility supports will result in scores that are not college-reportable.

Initial Stakeholder Review of RFI Results

ODE first engaged the Assessment Advisory Committee on May 30, 2017 to solicit feedback on the proposed process and timeline for implementation, which was within the historic scope of this standing committee. At that time, the Assessment Advisory Committee expressed concerns, most notably with regard to the importance of ensuring broad stakeholder engagement and the feasibility of the proposed timeline to procure and implement a new assessment as early as 2018-19. Additional engagement was effected in the winter and spring of 2018, which is summarized next in *Section 3*.

Section 3 – Additional Stakeholder Engagement

Background

ODE conducted a comprehensive stakeholder feedback process in the winter and spring of 2018 in order to supplement the initial feedback gathered from the ESSA Standards and Assessment Workgroup in 2016 and the Assessment Advisory Committee in 2017. The Standards and Assessment Workgroup made six recommendations for ODE to consider. Recommendation #5 was that "Oregon should support options and explore how to allow districts to use individual high school student flexibility of the summative assessment. All state-approved, nationally-recognized assessments need to provide comparable data that allows for statewide student performance evaluation. *If flexibility is not available at the individual student level*, then Oregon should explore how to allow districts to use another state-approved, nationally-recognized assessment in place of the high school statewide summative assessment" (See Attachment 2). The flexibility provided in ESSA Section 1111 (b)(2)(H) (see pages 30-31 of 449) did not provide for flexibility at the individual student level. The law elaborates a procedure by which local education agencies submit requests to the state education agency for approval to use a nationally-recognized, college entrance examination, district-wide, in lieu of the current accountability instrument. As previously mentioned, the law makes it clear that the nationally-recognized, college entrance examination must also meet all technical adequacy requirements within state accountability contexts, subject to the USED's Title 1 State Assessment System Peer Review process. The Work Group recommended ODE pursue flexibility at the individual student level, even knowing such was not provided for under federal law, in recognition that applying a nationally-recognized college entrance examination to all students would likely not be equitable, given concerns about these assessments' design and accessibility policies.

However, in the April 2017 Education Update from ODE, the Deputy Superintendent announced that "… stakeholders overwhelmingly have urged the state to explore the option of using a nationally recognized college readiness assessment such as the ACT or SAT, in place of Smarter Balanced, as the high school accountability measure." The article also states that "… we are prepared to replace Smarter Balanced at the high school level with a nationally recognized assessment for the 2018-19 school year." ODE's message was not to allow for the flexibility defined in ESSA, or to pursue flexibility at the individual student level, but to replace the Smarter Balanced assessment for all students statewide. This is a change that ODE could have accomplished within NCLB and is not connected to the flexibility identified in ESSA. Regardless, the move was never toward meeting the recommendation of the Standards and Assessment Workgroup.

Though it is not possible to determine what rationale may have been used for this decision, it is clear that allowing districts to use the ACT, SAT, Smarter Balanced assessment, or some other nationally-recognized college entrance examination at the district level would have led to some incredibly challenging, if not insurmountable, measure comparison hurdles. Oregon's accountability system would be challenged to evaluate the performance of students taking one of the assessments against students taking another. The assessments quite simply are not measuring the same constructs, nor do they measure academic achievement in the same manner. They are not aligned to Oregon's content standards in the same manner. The college

entrance examinations have also been historically implemented with college-bound students. Available documentation shows that the assessments cannot measure the full performance continuum, providing little to no information regarding student performance for students at the lower end of the performance distribution, approximately 15-20% of students in the study referenced (conducted by the Hawai`i Department of Education).

The Assessment Advisory Committee expressed that ODE should proceed with caution, that the two different types of assessments were made for different purposes, that one was norm-referenced and the other was standards-based (criterion-referenced). They had concerns regarding standards alignment and how relevant the assessments were for instruction. They also expressed concerns about the differences in accessibility between the assessments and noted that Smarter Balanced had worked for many years with the support of the Oregon Accessibility Panel to increase the accessibility of their system.

ODE continued to support pursuing the switch to a nationally-recognized college entrance examination by developing a Request for Information (RFI) in May 2017. The RFI summary, which was described in Section 2 and elaborated several concerns related to vendor responses, was shared with ODE leadership in June 2017, but was not presented in a public forum until March 2018. The Assessment Team followed directions to develop a Request for Proposals during this time period, which made it clear that the switch was projected to have an initial net cost of between $5.8 to $6.8 million dollars per biennium, was accounting for the cost savings from discontinuing the existing statewide high school assessments.

Cost Projections

A cost projection breakdown is provided below. These costs are initial and a few additional aspects require consideration: 1) The Assessment Team projected that it would be able to complete this transition with existing FTE even though the shift would cause a tremendous burden on current staff; 2) The Assessment Team did not project any expenses related to developing additional items to fill gaps identified by an alignment study; items cost anywhere from $8,000 - 10,000 each to develop and current studies suggest that 30-50% of the items that ACT or SAT deem “aligned” to the CCSS have been determined to lack such alignment by independent panels; and, 3) Finally, the Assessment Team was informed by another state assessment director that ACT proposed to charge them $300,000 just to develop achievement level descriptors. The Assessment Team based the top end of the anticipated study fees based on that projection, but know that this work can be done at lower expense (this was, in fact, possibly indicative of ACT’s lack of understanding of standards-based test development procedures).

Switching to Another Nationally Recognized Accountability Assessment (Scenario B)	$6,458,000– 7,415,000*
• $51 – 56.50 per-student vendor cost, assuming 47,000 students testing annually (based on May 2017 RFI responses) • $16 per-student cost for maintained test delivery, scoring, and reporting through current online testing vendor, assuming 47,000 students testing annually • Independent alignment study and report one-time cost (includes content, bias, and sensitivity reviews involving Oregon educators) • Standard setting and report one-time cost (achievement level descriptors and cut scores)	• $4,794,000 – 5,311,000 • $1,504,000 • $80,000 – 300,000 • $80,000 – 300,000

* This cost would be offset by a $582,800 biennial savings that would result from discontinuing the $6.20 per-student cost for our current high school assessment, for a net increase of $5,875,200 – 6,832,200.

ODE's 2017-19 budget could not support this additional expense. In addition, the concerns expressed by the Assessment Team in the RFI were granted a new level of attention. It was determined that the field needed to be made aware of these concerns as they deliberated about the impacts of switching our high school assessment. It was also clear that a wider body of stakeholders would need to be engaged in the discussion, as the high school assessment impacts multiple users of the statewide assessment system. A second phase of stakeholder engagement was implemented to address these considerations.

Stakeholder Engagement Summary

ODE was aware that some stakeholders wanted ODE to research the possibility of switching to a nationally-recognized, college admissions examination. Stakeholders also shared that students were over-tested in Grade 11, that there were general concerns about the time that students spent testing, and that students did not feel that there was a meaningful benefit for participating in the high school assessment. The second phase of the stakeholder engagement process shared the results of the RFI and asked participants to provide ODE with analysis of several high school assessment options that might help ODE address the identified stakeholder concerns.

The following stakeholders were engaged in this process between January and May 2018:

- ESSA Advisory Committee (Jan. 8 & May 30, 2018)
- Assessment Advisory Committee (Jan. 16, 2018)
- State Board of Education (Jan. 18 & Mar. 22, 2018)
- OACOA/COSA Conference (Jan. 26, 2018)
- State Advisory Council for Special Education (March 16, 2018)
- EL Advisory Committee (April 3, 2018)

- American Indian/ Alaskan Native Advisory Committee (April 4, 2018)
- African American/ Black Student Success Plan Advisory Group (April 6, 2018)
- Oregon Superintendent's Assessment Stakeholders Group (April 13, 2018)
- Oregon Student Voice (April 20, 2018)
- Deputy Superintendent's Advisory Council (April 27, 2018)
- Oregon Association of Secondary School Administrators (OASSA) – President Elect (May 4, 2018)
- Oregon Accessibility Panel (May 10, 2018)
- North Clackamas CTE Program (May 18, 2018)
- High school students & principals, parent advocate groups, and teachers

Feedback was gathered from each group related to the following six high school assessment options. Selecting Option #1 was exclusive of the other options, but many options could work in a complementary fashion. Respondents were thus asked to select all options that they wanted ODE to pursue to address the identified stakeholder concerns.

NOTE: Option #4 below was not shared with groups prior to April 20, 2018 as it came to light in an unrelated discussion with a group of District Test Coordinators on that date.

1. Switch to a nationally-recognized, college entrance examination, such as the ACT/SAT
2. Maintain 11th Grade as our grade of accountability, but allow for early testing for 10th graders who meet certain criteria (TBD)
3. Switch the grade of accountability to 10th Grade
4. Remove the 66% instructional day requirement as an expectation for high school students from the Test Administration Manual (TAM)
5. Work with Institutes of Higher Education to accept scores from our high school assessments for college admissions decisions
6. Work with Smarter Balanced to improve the utility of our 8th Grade and 11th Grade individual student reports

ODE also informally collected public comment via email and phone calls during the winter and spring of 2018, which are documented and summarized below.

The following summaries were gathered from the input forms that were distributed at each of the stakeholder engagement events and are organized by group, in the same order presented above. The groups were composed of different numbers of representatives, ranging from one to 100, so the summaries provided below convey the dominant responses of each group engaged, with illustrative comments to demonstrate, in their own words, the concerns that stakeholders shared with ODE.

ESSA Advisory Committee

This group was initially presented with the general overview of ODE's concerns surrounding the possible switch to an ACT/SAT, as elaborated by the RFI summary on January 8, 2018. Though no feedback was requested, general sentiment demonstrated that ODE's concerns were valid and that ODE should be careful about proceeding until those concerns were addressed. One

participant's observation, after hearing all of the concerns present in the RFI was, "What's the point?" The group was again engaged on May 30, 2018 to help the Deputy Superintendent of Public Instruction work through the initial recommendations resultant from this report.

Assessment Advisory Committee (AAC)

While the AAC did note that switching to ACT/SAT would allow a limited number of students to use the results for college admissions, they underscored the ramifications of using the assessment within an accountability context and did not support the switch to an ACT/SAT, which they deemed would cost too much and not be a sufficient fit within the statewide assessment system, "Creates a multi-vendor assessment tool with no relationship between the 8th Grade Assessment and the HS one. This is a critical dis-alignment of the assessment system." They supported the allowance of early testing at Grade 10 for similar reasons, and also noted that this change "Would provide flexibility for high schools and allow students to test when the content is freshest." They cautioned against changing the grade of accountability to 10th grade, as it would not provide students a sufficient opportunity to learn the content that they would be tested on. Similarly, the group supported elimination of the 66% instructional threshold requirement, as it "allows more flexibility and reduces the 11th grade compressed timeline for testing for students." They noted that eliminating the 66% instructional day requirement would introduce less conflict with college entrance testing and allow students to test when the content is freshest. The AAC was fully committed to pursuing use of Smarter Balanced scores for college admissions decisions. One respondent noted that this pursuit would "Provide value added and motivation for all students, which could also increase scores and participation." Another shared that "YES. I think this is critical that higher ed uniformly use the SBAC scores to allow students to be 'accepted' to a public university." The AAC did not know what increasing utility of the scores for the 8th or 11th Grade assessments would look like, specifically, and cautioned against uses of the data that are not supported by the measures, but they did support any efforts to "facilitate and increase.. the amount and reliability of useful information the assessments provide…" Beyond the requested information, the AAC recommended that ODE should be transparent about its predictive validity studies and publish all of the correlations with college success indicators, once available. One respondent noted that "Public transparency about the effectiveness and value of the assessments… or the reasons that the assessment might need to change. Either way – transparency and communication improves."

State Board of Education (SBE)

ODE presented the SBE with the concerns resultant from the RFI in an informational context. The topic was originally scheduled for discussion in June 2017 but was deferred to provide additional time for internal evaluation. ODE first engaged the SBE to discuss the RFI results in January 2018, during which time the Chair noted that SAT and ACT have questionable utility for their intended purpose, much less for accountability purposes. When presented with a summary of the issues within the RFI during a follow-up discussion in March 2018, the Board generally acknowledged the concerns. However, some Board members drew the Assessment Team's attention to the opt-out challenge and questioned whether the additional high school assessment options presented (i.e., those in lieu of the ACT/SAT switch) would be viable solutions from the perspective of high school students.

OACOA/COSA Conference

Attendance at this conference was expected to be high, as Superintendents were one of the stakeholder groups that the Assessment Team had been informed by prior leadership was heavily invested in a switch to ACT/or College Board's SAT. This level of expected intensity was not reflected by audience participation. Both of the two superintendents in attendance understood the cautions about switching to ACT/SAT and did not support the move. Two members of College Board attended the presentation and asked several questions regarding the Peer Review process. Two participants were consultants who did not identify their association with the conference. In short, the only official feedback form was provided by a consultant and recommended that ODE consider switching to ACT or SAT. However, the feedback form process was created for educators, parents, and students – not consultants.

State Advisory Council for Special Education (SACSE)

SACSE members were clearly concerned about the accessibility issues conveyed in the presentation and generally did not support the switch to ACT/SAT for this reason. Members also expressed concerns about the cost of switching to a nationally-recognized college entrance examination. Many expressed concerns about the overall time spent testing. The group had several concerns about switching the grade of accountability to 10th Grade, including cost and insufficient time to learn the tested concepts. One member suggested that we should consider changing the grade of accountability to 12th Grade and use the assessment as a true summative experience. Another shared that ODE should "Pursue aggressive and innovative changes to testing that increases instructional time and reduces testing for students k-12." One member had a general statement about the test development process for all of our assessments, encouraging ODE to "involve the nine tribes of Native Americans in the process and make sure their culture is represented…" SACSE members supported allowing early testing at 10th Grade, but also expressed concern that developing the criteria used to make this decision might be a difficult process. The group predominantly supported the solution of using predictive validity studies to leverage discussions with Oregon institutions of higher education in order to allow students to use their Smarter Balanced Assessment scores for college admissions decisions. One member stated, "One test that actually measures/reflects academic potential as well as reflective of student's experience (core standards)." The group also noted some challenges therein. One respondent stated that this work is "Complicated for university ranking. UO is invested in its ranking." They also identified general concerns related to "Getting High Ed on board."

EL Advisory Committee (ELAC)

The ELAC members were most supportive of working with Higher Education to address the predictive nature of our existing assessments, with an eye toward using the Smarter Balanced results for college admissions decisions. They noted challenges in working with Higher Education in the area of aligning expectations and standards. Members also supported early testing at Grade 10, while maintaining Grade 11 as the grade of accountability. One member shared that individual students should be able to select which high school assessment option they want from a menu, also recommending that ODE "move forward with the RFP, it is a powerful mechanism for equity is [*sic*] used appropriately." One member shared that ODE

should “Continue to improve accessibility and accommodations for students. Explore interim assessments and digital library supports. Need multiple methods to meet accountability measures. I feel the ACT/SAT options create more barriers for our EL and SWD students.”

American Indian/ Alaskan Native Advisory Committee (AI/AN)
The AI/AN committee did not submit any official feedback, as they did not have the opportunity to gather to officially vote on the topics presented. However, they offered feedback that helped guide ODE’s decision-making regardless. The group stated that they clearly do not support switching to the ACT or SAT. They cited concerns around different test purposes, racial biases that are included in the ACT/SAT, and concerns about the assessments’ alignment to college and career readiness standards. They asked if ODE had considered any assessments other than ACT/SAT, wondering why the GED was not included in the discussion. They also asked why ODE would consider privatizing our state assessment system.

African American/ Black Student Success Plan Advisory Group (AA/BSSP)
One member of the AA/BSSP group made it clear that she supported the switch to the ACT/SAT for the simple reason that colleges are using the assessments for admissions decisions. She noted that the alternative high school options identified in the presentation would not meet the needs of Oregon’s African American/Black student population because they do not go to school in Oregon. Another member reported that “the inability to accept accommodations and still receive a score that would be reportable to colleges” was a serious concern and that “African American/Black youth are over represented in the education system for having IEPs and other disabilities that may require an accommodation.” This member supported pursuing an agreement with Oregon public universities and colleges to accept scores from the Smarter Balanced assessments in admissions decisions and was hopeful that we could negotiate with Historical Black Universities (HBU) to use these scores, as well. The respondent noted “What better way to help a young person feel like they can go to college, than to give them that score/opportunity that says you belong there.”

Oregon Superintendent’s Assessment Stakeholders Group (OSASG)
The OSASG responded to a different, but related, series of questions regarding the high school assessment. They were asked the following four questions. Responses are summarized below each question:

1. Where should the state prioritize its resources and support focused on assessment?
   Answers: **73%** Ongoing Formative & Interim Assessments designed to guide classroom instruction across content areas; **28%** Neither; and, **0%** Summative Assessments designed to address accountability requirements in core content areas..

2. Do you see these accessibility obstacles as a concern for an assessment used for both school accountability and individual essential skills purposes?
   Answers: **83%** Yes; **3%** No; and, **15%** Unsure.

3. Do you see equity or logistical issues as a concern for an assessment used for both school accountability and individual essential skills purposes?
   Answers: **79%** Yes; **3%** No; and, **18%** Unsure.

4. Which is your most preferred approach to the HS Assessment?
   Answers: **44%** Allow OAKS/SBAC scores for college admissions decisions; **31%** Something Different; Maintain 11th Grade for accountability, allow for 10th Grade participation; **8%** Change grade of accountability to 10th Grade; **5%** work to increase the utility of 8th Grade and HS scores; and **3%** Pursue replacement assessment with a college entrance examination.

The OSASG, composed of Superintendents, clearly wanted ODE to work on predictive validity studies that could be shared with Higher Education in order to increase understanding of prediction of college success indicators in the hopes that the scores could be used for college admissions purposes in Oregon. They felt that this would motivate students and align Oregon's system.

Oregon Student Voice (OSV)
The OSV, a student-led organization that empowers students to be authentic partners with K-12 education decision makers, made three recommendations to ODE, all involving preservation of Smarter Balanced as Oregon's statewide assessment: "1) Allow students to take sections of the assessment earlier in their high school career in order to limit test burdens in students' junior year; 2) Work with Oregon higher education institutions to waive SAT and ACT application requirements if a student receives a level 3 or level 4 on the high school summative assessment; 3) Increase communication with students about the purpose of the assessment, specifically how it impacts student learning, understandings of student academic achievement locally and statewide, and Oregon's access to Title 1 funding." The group noted that many were concerned about the time spent testing and that the assessments impacted their self-esteem. The OSV was hopeful that allowing students to take the Smarter Balanced assessments earlier and allowing them to use the results for college admissions might allow them to "view the assessment in a different light."

Deputy Superintendent's Advisory Council (DSAC)
The DSAC did not provide official feedback as a group, but appeared to understand and validate the concerns presented by the Assessment Team resultant from the RFI. Participants, primarily teachers, submitted concerns about the accessibility limitations related to the potential switch to the ACT/SAT, as well as equity concerns related to the receipt of college reportable scores. Some members also submitted concerns about the time spent testing and the amount of time it takes to get test results back after tests are submitted.

Oregon Association of Secondary School Administrators (OASSA) – President Elect
This discussion involved only one participant, but the participant stated that the observations shared were those of the entire committee. However, the entire committee had not received

the concerns identified in the RFI when they last considered the option of switching to the ACT/SAT. Nonetheless, the stakeholder supported a switch to a nationally-recognized college entrance examination, such as ACT/SAT, noting that 11th graders do not "buy in" to the Smarter Balanced assessment because it cannot be used for college admissions nor to qualify for scholarships. The respondent stated that the highest achievers are interested in the ACT/SAT and AP examinations, not the Smarter Balanced assessments. The respondent noted that the time spent testing was a significant challenge, though also admitted that this could be done in more efficient ways. Over-testing at Grade 11 was a serious concern, as junior year is the most difficult year academically. The respondent did share that some teachers felt that ODE should not make the change, and that they were just getting familiar with the Smarter Balanced assessments, and that adjusting to yet another change would take them up to five years to adjust instructionally.

Oregon Accessibility Panel (OAP)

One OAP member shared a story that is worth documenting here. The story highlights how long it took the respondent to negotiate with College Board in this case to get the accommodations that the student needed:

> "Hi, I would to give feedback regarding this - this is the first year I assisted getting Assistive Technology Accommodations for a student with severe Learning Disability from the College Board for SAT's. It took 6 months to get everything approved and the test was sent on a flash drive in Microsoft Word. It was unbelievable. This student used text to speech and they kept insisting she needed a screen reader - which is designed specifically for blind students. I tried to explain this to them and I had the feeling that they didn't understand what the needs of a Learning Disabled student [*sic*] was. She also needed speech to text and they stated that she couldn't use it if it was just for spelling. I had to explain that her spelling was so aberrant that unless you had context you wouldn't be able to understand the word. She has 127 IQ and a processing speed of 60 and she is in several IB classes. She is planning on being a Nautical Engineer and applying to colleges on the East Coast. She passed the SAT with a score of 1070 in the 65%. This processes [*sic*] was so time consuming. When I asked when they were going to make it electronic, the College Board representative stated five years. When I spoke to Air Secure in Washington DC she said they were designing the electronic version of the SAT and it would be out sooner than that"

This group did not support the switch to ACT/SAT, though one member said they would consider other options that were not listed. The recommendations show support for eliminating the 66% instructional day requirement and allowing early testing. One respondent noted that removing the 66% requirement "…will be a win for schools to facilitate test scheduling and ease the burden of spring testing." Another shared that maintaining Smarter Balanced but allowing for test scheduling flexibility "Provides info. of how students are achieving in school; takes adv. Of all assessment strengths; alignment to Oregon's adopted content standards; accessibility; accessibility options for all students."

North Clackamas CTE Program (NCCTE)
The NCCTE program was more interested in discussing performance assessment and additional ways of determining student proficiency. There was no interest in switching to the ACT/SAT in their educational context, as they feel that their system of performance assessments, reviewed by Workforce Panel members and validated by teachers, is a superior mode of assessment that should be scaled up for use within Oregon's statewide assessment system.

High school students & principals, parent advocate groups, and teachers
Over one hundred high school seniors who opted out of the high school assessment as juniors were consulted regarding our high school assessment. The group, as a whole, was not informed about the purpose of the statewide assessment system nor the ways in which ODE uses the data. Only one reported having a substantive discussion with a parent regarding reasons for opting out of the assessment. The students all shared that they would have been much more interested in taking the Smarter Balanced assessment if it could be used for college admissions decisions. They also shared that they would have felt an ethical reason to participate if they had understood that the test results were used to identify students whose education systems were not meeting their needs. Students general felt overwhelmed by testing in junior year, primarily because the testing all occurred at the same time period, in late April/early May, "Junior year, I think all of my classmates will agree, is incredibly stressful. ACT, AP Exams, exams for courses. It's almost impossible."

The high school principals consulted generally stated that they recommended the switch to an ACT/SAT whether or not they had personal or professional reservations about making such a recommendation. They felt that their stakeholders wanted the ACT/SAT so they needed to represent their stakeholders' desires. Principals emphasized the impact of the opt out practices in their locations, noting that students had already met their Essential Skills by taking the PSAT in many cases, and simply did not need the Smarter Balanced assessment results. The one exception was in writing, which is not offered on the PSAT. This likely explains the participation rate differences between ELA and mathematics, at least to some degree, at the high school level.

Parent advocates involved in these discussions were generally against standardized testing altogether, though some recognized the need and utility for such systems for use by state and federal policymakers to protect civil liberties and ensure appropriate use of public funds. The group was most interested in discussing work on formative assessment practices and performance-based assessments.

The teachers and educators who offered official comments were generally opposed to switching to the ACT/SAT, with two exceptions. The majority supported maintaining our current system because it is aligned with our standards and they had worked for years to adjust their curricula and instructional approaches to match the standards; they felt that the Smarter Balanced assessments exhibit strong alignment to Oregon's adopted content standards and should be maintained. Two teachers who supported the switch identified concerns regarding test scheduling, how long the assessments take, and the lack of engagement from students

because they do not have any perceived benefit from participating. One respondent stated that, “I personally feel like SBAC *[sic]* should be eliminated and not replaced with any standardized test.” The same teacher stated that the typing required on the Smarter Balanced assessment created educational inequities against underserved populations, as did the allowance for students to take as long as they need to complete the assessments (because they miss instruction while they are completing their tests, though classmates who finish earlier do not). Another respondent identified challenges with test scheduling and noted that students do not need Smarter Balanced to meet Essential Skills in many areas because ODE allows for the use of many other standardized tests for this purpose, in addition to work samples.

As mentioned, most educators who provided public comment wanted to maintain the Smarter Balanced assessments. They shared statements like the following, “As someone who has been in math education for many years, I feel like we finally have an assessment that measures mathematical thinking AND skills with Smarter Balanced.” Others expressed consternation at the original implementation timeline shared, noting that transitioning to ACT/SAT or some other college entrance measure by 2018-19 was simply not feasible. One member who had been heavily involved in the nationally-recognized college entrance examination discussion as a district test coordinator shared that “There was never a single instance when it was stated, hinted, implied, or alluded to that Smarter Balanced would be dropped altogether for high schools. When was this decision made and by who *[sic]* and who were the actual stakeholders that gave input? I have not yet been able to identify a single person who was involved with or consulted about this decision and I have asked everyone I could possibly think of, including members of official ODE advisory committees, who may have had even a slight level of participation.” This submission validated ODE’s decision to conduct additional stakeholder engagement, as the prior process did not appear to have been fully inclusive nor transparent.

Our state stakeholders did not support a switch to a nationally-recognized college entrance examination. The following section elaborates the national perspective, from other states and measurement experts.

Section 4: State and National Perspective

Background

Several stakeholder groups around the nation have reviewed or studied whether states should pursue the option of allowing the flexibility for districts to use a nationally-recognized college entrance examination as their state accountability measure in high school, as allowed in the Every Student Succeeds Act (ESSA). Information from these stakeholders generally validates the areas of concern identified by ODE's Assessment Team resultant to the Request for Information (RFI). The discussion, which is summarized below, includes input from state education agencies, accountability experts, and measurement experts. The recommendations for states are that they either proceed with caution, addressing areas of concern related to test purpose, alignment, accessibility, state monitoring authority, and instructional reinforcement, or avoid using nationally-recognized college entrance examinations for accountability purposes altogether.

As of early 2018, 13 states were using a nationally-recognized, college entrance examination as their high school accountability measure; seven of those states were implementing the SAT, while six states were using ACT (Education First, 2018). Other states were using ACT, SAT, or both, but not for accountability related to achievement, while 24 states did not use either ACT or SAT for any purpose. However, no state seeking to use either the SAT nor the ACT has received approval by the US Department of Education's Title 1 Statewide Assessment Peer Review process at present. Peer reviewer concerns for the ACT, as evidenced in Wyoming's December 2, 2016 Peer Review letter, are noted in the areas of monitoring of test administration, test security, data security, alignment (via an independent alignment study), validity based on cognitive processes, validity based on test structure, accessibility for students with disabilities and students who are English learners, accommodations, State adoption of achievement standards, achievement standard setting, and reporting. More recent Peer Review results from reviews conducted in February and March of 2018, which include a review of the SAT, are expected in the coming months: USED Peer Review Letters.

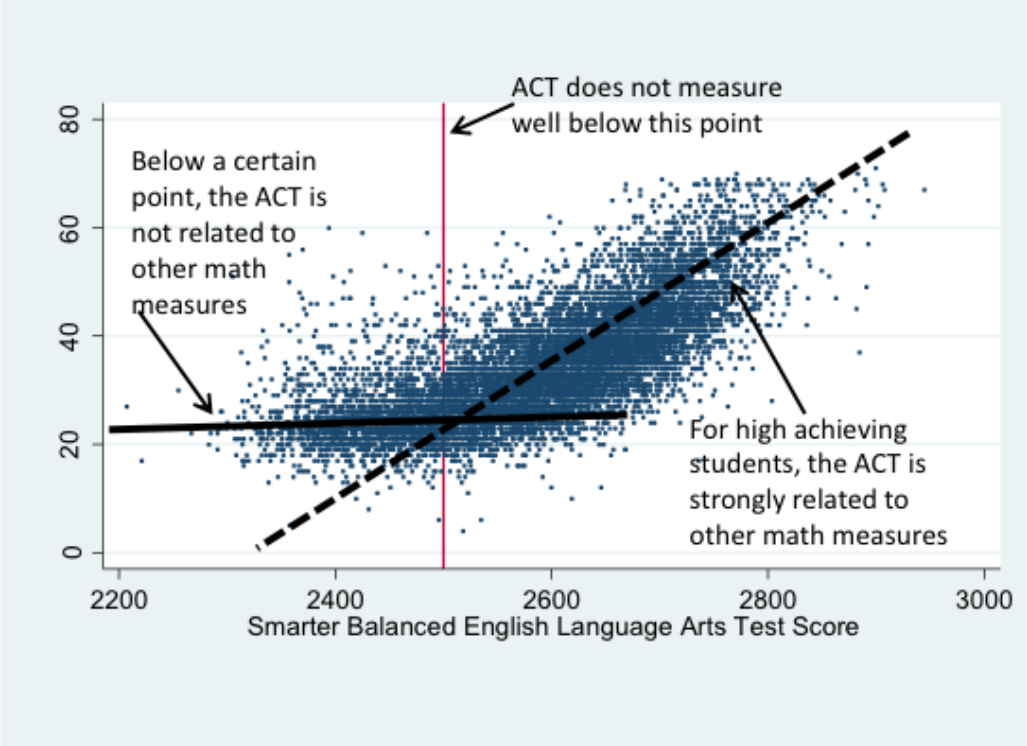
State Perspectives

Consistent with the original procedure identified in ESSA, the Long Beach Unified School District in California requested to use the SAT as its high school assessment. The state department of education was then required to review the request, develop criteria to use to determine whether or not to approve the request. California Superintendent and State Board of Education issued a joint letter in response to this request: CA Joint Letter. The February 23, 2017 letter conveys a rejection of the request for six reasons that are elaborated in the letter: 1) the requirement for an independent alignment study within ESSA; 2) difference in test design and related purposes; 3) limitations in the area of accommodations/supports that would be available to students; 4) report utility and standard setting procedures; 5) potential fiscal impact related to Title 1 compliance; and, 6) data ownership and student privacy.

Related to the concerns in the areas of alignment, there is evidence from Hawai`i that the scales from ACT (and for similar reasons, likely the SAT) do not appropriately measure the full distribution of student performance relative to the Common Core State Standards (Oregon's

adopted content standards) (HIDOE, personal communication, 5-7-2018). A figure that demonstrates the relationship between the Smarter Balanced test distribution and the ACT test distribution is provided below. It is clear that the lower end of the distribution is not measured accurately by ACT.

Exhibit 1: Relationship between ACT and Smarter Balanced ELA Assessments in one state



The researcher from Hawai`i further shared the supplemental analysis provided below, which is quoted from the report shared:

> *Who are the students who fall below the ability of the ACT to measure? Exhibit 2 shows this information for the one state on which this study is based. Nearly one quarter of all students fall into this group. The vast majority of English language learners and students with disabilities fall into this range, as do a disproportionate number of economically disadvantaged students. With the ACT as an accountability test, these are the students who are effectively left out of the accountability system.*

Exhibit 2: Some characteristics of the students for whom the ACT does not provide reliable measurement

Group	*Percent of group not measured well by ACT—falling below 2,500 on Smarter Balanced*
Everyone	*23%*
English Language Learners	*87%*
Students with Disabilities	*71%*
Economically Disadvantaged	*31%*

This presents another substantial threat to measure sufficiency and would be a risk point within the Peer Review process, as states are required to provide evidence that the assessment is accurately identifying student achievement across the full performance continuum (Critical Element 4.3).

Independent Evaluations of Alignment

Several independent evaluations of SAT and ACT have been conducted, both by state education departments and independent organizations. One of the most comprehensive state studies was completed by the Florida Department of Education, which was contracted out to the Assessment Solutions Group (ASG): Florida College Entrance Exam Feasibility Study. The mission of ASG is to help states and local districts maximize value throughout the assessment procurement and implementation process. The study evaluated the potential impact of switching to the SAT or ACT on Florida's assessment system in the areas of alignment, test comparability, accommodations, accountability, and peer review. The researchers identified gaps in alignment to Florida's content standards, that the SAT and ACT do not yield results that are comparable to their current state assessment, as well as a lack of transparency in decision-making around accommodations. In addition, the researchers found that accountability determinations would also be affected by the test selected (a significant concern for accountability systems that would be required to demonstrate test comparability), and that there were areas in which the ACT and SAT would not meet the six Critical Elements within the USED Peer Review process. The final summary from the Executive Summary states that, "It is the opinion of ASG and its partners that due to the alignment comparability and accountability system issues associated with the ACT and SAT tests allowing districts to pick which of the three tests to administer to its students is not appropriate and likely will not meet federal ESSA peer review requirements."

Achieve, a nonprofit education organization that has spent two decades leading the effort to help states make college and career readiness a priority for all students, completed an independent alignment study of the ACT with the Common Core State Standards in 2017 (Achieve, 2017). Achieve used an approach tied to the Council of Chief State School Officers' (CCSSO) Criteria for Procuring and Evaluating Large Scale Assessments. Achieve's review of the ACT found weaknesses in ELA and mathematics for both content and depth. Fewer than 50% of items reviewed were determined to be aligned to the claimed Common Core State Standards. For example, many items that claimed to measure writing standards did not ask students to produce writing, as indicated in the state's content standards. In mathematics, fewer than half of items on the assessment were judged to be aligned to the claimed Common Core mathematical content standards for high school. This finding, while low, may be less surprising given that ACT's technical documentation indicates that 40-43 % of the mathematics items on the assessment are intended to measure mathematics content that aligns to pre-8th grade expectations: Achieve ACT Study.

Human Resources Research Organization (HumRRO), an organization that research, program evaluation, and policy analysis, HumRRO has supported a wide variety of federal and state agencies as well as corporate and nonprofit organizations, and foundations, conducted an

independent evaluation study on the SAT In 2016 for Delaware and Maine, both of whom adopted the Common Core. The results summary statement stated that, "SAT is reasonably aligned to the high school reading and writing portions of the CCSS, but less so for the math portions." The rate of agreement in Reading with College Board's alignment claims was 76%. Similarly, in Writing/Language, 76% of items had item agreement. Only 47% alignment agreement existed between the College Board and reviewers in math, however. The HumRRO SAT Study recommended that states using the SAT should supplement mathematics to cover content in noted gaps, particularly in geometry and statistics, and develop additional high-school-level items given the amount of below-grade-level content.

National Concerns

Achieve also published a brief that elaborates similar concerns in the same areas: Achieve College Entrance Exam Brief. Achieve also published a news report recommending that states not pursue adoption of college entrance examinations for high school accountability purposes on March 13, 2018. Achieve's news report provides the following overview:

"Three recent independent studies from Achieve, HumRRO, and Assessment Solutions Group, using different but complementary approaches, have examined the alignment of these tests with state academic standards as well as other important issues. Taken together, these studies reveal significant challenges for states in using the ACT or SAT to assess student achievement of state standards or as a significant factor in state accountability systems. Furthermore, the research is clear that summative assessments impact the content educators cover and the instructional materials that they use in their classrooms. The use of these assessments – which are often not aligned with state academic standards – will impact what is taught in high school classrooms.

Recommendations from the report include:

- *States should not use the ACT or SAT as the statewide accountability measures for ELA and mathematics.*
- *States should not allow districts to administer the ACT or SAT in lieu of its statewide summative assessment.*
- *States that have adopted the ACT or SAT should ask those companies to augment their tests to improve alignment to send better signals to educators about instruction, and ACT and the College Board should respond affirmatively.*
- *States that do not use the ACT or SAT as their statewide summative assessment should make sure that their current tests send meaningful signals about college and career readiness."*

National Measurement Expert Opinion

The National Council on Measurement in Education (NCME), a professional organization for individuals involved in assessment, evaluation, testing, and other aspects of educational measurement, published a position statement on March 15, 2018 that outlines the validity evidence that is lacking in efforts related to using normative, college entrance examinations for state accountability purposes. The statement directs attention to the following five areas that

would need to be addressed: 1) Using average admissions test scores as a means of evaluating high schools, school districts, or state educational systems; 2) using admissions tests as high school graduation tests; 3) using average college admissions test scores of nearby schools as a factor in rating the desirability of real estate; 4) using an admissions score as the sole indictor of college and career readiness; and, 5) using a candidate's college admissions test score in making hiring decisions. NCME's five areas of concern highlight the lack of alignment between instruction, curricula, and college entrance examinations.

Developing Predictive Validity Documentation

In addition to the concerns noted above, there is burgeoning evidence that standards-based assessments, such as Oregon's Smarter Balanced Assessments in ELA and mathematics, are as predictive of college success as the ACT or SAT. At present, there are three sources of information that speak to this predictive capability. Iowa studied their statewide assessments in reading, mathematics, and science and determined that their standards-based assessments were as predictive of college success indicators (i.e., freshman year GPA, first-year course grades, as the ACT: Iowa Predictive Study.

Though this study did not employ Smarter Balanced Assessments, it does provide evidence in the form of a literature synthesis and study demonstrating that standards-based assessments, in general, are predictive of college success indicators. The study found that higher test scores on their state's standards-based assessment were associated with higher course grades and GPA. Similarly, they found that their state assessments were correlated with the ACT and similarly predictive of college success indicators. South Dakota, whose public university system now accepts Level 3 or 4 Smarter Balanced assessment scores for college admissions, published the means of the ACT and Smarter Balanced scores in reading and mathematics in relation to college success indicators (i.e., freshman year GPA, course credits attained in freshman year, and first year completion). The pattern of means suggests a relation between Smarter Balanced assessments results and college success indicators that is comparable to those conveyed by the ACT. Most recently, the California Department of Education commissioned a study that evaluated the predictive validity of high school GPA, Smarter Balanced scores in ELA and mathematics, and SAT results.

The California Predictive Study determined that high school GPA is the most predictive variable in relation to college success indicators (freshman year GPA, freshman year course credits attained, and sophomore year completion [perseverance]). Beyond that, the Smarter Balanced scores were generally as predictive as SAT scores. Adding SAT to SBAC did not explain additional variance, suggesting that the influence of either assessment on the relationship with college success indicators is comparable (i.e., resultant from shared variance explained). These results held across student groups, as well (i.e., race/ethnicity, and students experiencing poverty). Of note, the study had to correct for restricted range, as the sample of students who participate in the Smarter Balanced assessment results span the grade level distribution, while the student sample who participate in the SAT are ostensibly college-bound and toward the upper ranges of the distribution. These results should be shared with a few caveats, identified by the researchers. The Smarter Balanced results were from 2014-15, the first year of implementation.

This begs the question of opportunity to learn. Second, the SAT went through a substantial redesign and the results included in this study were from the prior version of the SAT. Finally, students had multiple opportunities to participate in the SAT but only one opportunity to participate in Smarter Balanced. The SAT may thus be more representative of an optimal score.

Section 5: Report Summary and Recommendations

Summary

The Oregon Department of Education (ODE) completed a comprehensive study of the stakeholder concerns surrounding Oregon's high school assessments in ELA and mathematics from 2016 through 2018. Feedback was first gathered via the ESSA Planning and Implementation process. Stakeholders expressed concern about over-testing at Grade 11, the time spent testing, and the lack of perceived meaningful benefit to students for participating in the assessment. They recommended that ODE research the possibility allowing for alternative high school assessment options other than Smarter Balanced, with a nationally-recognized college entrance examination such as ACT/SAT, as the intended target. Pursuant to that recommendation, ODE issued a Request for Information (RFI) requesting vendors to respond to the ways in which they address technical adequacy and the per-student costs of the assessments they deliver. These results were published in the RFI summary (Attachment 3) and are summarized in Section 2 of this report. ODE also studied and discussed the consequences for each of the options presented to stakeholders and solicited feedback during of the stakeholder feedback process subsequent to the RFI. Finally, this report presented information from national experts in assessment, who support the Assessment Team's stated concerns in the areas of alignment, accessibility, and legal compliance.

The misalignment between ACT/SAT and Oregon's adopted content standards is a critical consideration for Oregon. College entrance examinations are norm-based tests that are designed to be predictive of college success. Standards-based assessments are designed to determine a level of mastery of clearly defined standards that contain valued knowledge and skillsets required to ensure that students graduate college and career ready. Oregon adopted the Common Core State Standards, which define the content and performance expectations that Oregon students are expected to learn. The evidence available suggests that college entrance examinations do not fully align with the depth, breadth, and complexity of the high school content standards. If a switch were pursued, Oregon would need to develop items to fill these anticipated gaps in alignment. This would result in additional costs beyond the projections called out in this report and would also result in a longer assessment.

Given the documented and validated concerns in the areas of alignment, accessibility, equity, legal compliance, time/scheduling, and costs expressed by representative stakeholders, national measurement organizations and experts, and ODE's Assessment Team, in addition to the burgeoning evidence that standards-based assessment results, such as Smarter Balanced assessments, are as predictive of college success indicators as the ACT or SAT, the Assessment Team recommends that ODE pursue the following course of action in order to address compelling stakeholder concerns regarding Oregon's statewide summative high school assessment:

Assessment Teams' Recommendations

1) **For implementation in 2018-19**: Remove the 66% instructional day requirement for high school students only. This allows for additional scheduling flexibility for juniors who might be ready to take the test earlier in the school year. This solution does not address

general concerns about over-testing in the entirety of junior year, but it would alleviate the scheduling conflicts associated with testing during the last two weeks in April and the first two weeks in May. This small, no-cost change might be sufficient to address stakeholder concerns regarding test scheduling. The Assessment Team has already taken action to implement this policy change for the 2018-19 school year, if supported.

2) **For implementation in 2019-20** *(if needed)*: Allow testing at Grade 10 by adopting a policy for students in advanced courses who are prepared to participate meaningfully in the assessment as 10th graders. To implement this recommendation, ODE would need to convene a committee of stakeholders in the summer of 2019 to develop guidance and criteria for determining student eligibility for 10th grade testing. This switch would also increase expenses in 2019-20, as both existing 11th graders and an additional set of test-ready 10th graders would participate. ODE would need to project participation rates and cap participation at a specific level in order to be able to cover this policy change. To that end, ODE has included a budgetary request for the 2019-21 biennium anticipating an additional 10,000 students testing in 2019-20 (approximately 25% of the 10th grade cohort).

NOT Recommended

1) The vast majority of stakeholders consulted from January through May 2018 made it clear that they do not want ODE to switch to a nationally-recognized college entrance examination, such as ACT/SAT, at this time. They recommended the above as alternatives to meet the needs of stakeholders, supplemented by the ongoing activities described below. Some respondents noted that ACT/SAT and other potential vendors are tracking this discussion and will likely make efforts to address Oregon's concerns over the coming years. There are indications that the vendors are making progress in some of the areas of concern identified within this document. However, the equity, accessibility, fiscal, and instructional costs of making this move right now in Oregon are much too great.
2) Very few stakeholders supported changing the grade of accountability to Grade 10. The general sentiment was that most students are simply not ready for the content assessed on the Smarter Balanced assessments in ELA and mathematics by Grade 10. Even though the tested content could be modified by test blueprint changes to address this concern to some degree, this perspective is supported by our most current 2016-17 achievement data, as 69.4% of 11th graders were at Level 3 or 4 in ELA and 33.9% of students performed at Level 3 or 4 in mathematics. Asking 10th graders to meet a similar level of expectation may have undesirable consequences. There would also be increased costs for ODE related to this change, as students who did not meet proficiency expectations as 10th graders would retake the assessment as 11th graders, and possibly again as 12th graders, in order to meet Essential Skills requirements. While these challenges are not insurmountable, as demonstrated by other Smarter Balanced consortium member states who have shifted their grade of accountability, addressing them would require a significantly heavier lift than the other options which ODE staff recommend pursuing at this time.

Ongoing Activities

1) ODE is actively working with Oregon's Higher Education Commission and Institutes of Higher Education to share college success indicator data. Access to these data, either directly or through the State Longitudinal Data System (SLDS) would allow ODE to conduct predictive validity studies that may lead to use of Smarter Balanced assessment scores for college admissions decisions in Oregon. The first cohort of students took the Smarter Balanced assessments in spring of 2015 and have just finished their sophomore year of college. This timeline allows for studies that compare Smarter Balanced ELA and mathematics test results to ACT, SAT, and also to identified college success indicators: 1) freshman year grade point average [GPA]; 2) remedial courses taken; 3) course credit acquisition through sophomore year; and, 4) perseverance through the end of sophomore year. It's quite possible that this effort may also eventually be acknowledged in other Smarter Balanced Consortium state university systems.
2) ODE will also work with the Smarter Balanced Assessment Consortium and other consortium member states to develop resources aimed at increasing understanding of and utility of test scores resultant from the assessment system. For example, 8th grade results might be useful in planning summer remediation prior to high school as well as high school coursework scope and sequence. The 11th grade results could be useful in determining what courses were needed in order to graduate college and career ready. These discussions must occur within an overall discussion of the Essential Skills.

These recommendations address stakeholder concerns regarding test scheduling at Grade 11, which appears to be the more immediate challenge faced by students, not over-testing at Grade 11 in general, by first allowing for additional test scheduling flexibility. If that effort is not sufficient to address need based upon stakeholder feedback conducted in the spring of 2019, ODE may elect to allow for early testing at Grade 10 in 2020. Stakeholders would need to be engaged to develop the criteria that must be met to allow for early testing, as well as to validate ODE's method of limiting participation in order to establish cost limitations. Ongoing efforts to incorporate Smarter Balanced assessments into the college admissions process, first here in Oregon, thereafter in other Smarter Balanced Consortium states, and, possibly, nationally, should address the perceived benefit of college admissions in a manner that protects student accessibility and honors state monitoring and management authority. In terms of the equity lens, all students in Oregon would benefit from this change and it could even allow for students from historically underserved populations to consider college and gain admission in a systematic manner. There are no Smarter Balanced test prep courses or materials that might affect these outcomes in an unfair manner; the only way to prepare for our 11th grade assessment is to have 11 great years of instruction and effort. It is also expected that opt out rates would decrease at the high school if the scores had college admissions implications.

Additional Concerns

The stakeholder engagement process brought to light some related concerns that must be addressed as part of continuous improvement processes for the statewide assessment system: 1) stakeholders want a balanced assessment system; 2) state assessment opt out practices

require a solution; 3) engagement with federal policy makers; and, 4) communication must be transparent.

First, stakeholders want ODE to implement a balanced assessment system, composed of formative assessment practices, a statewide interim/benchmark assessment system, and a summative assessment system with a smaller footprint. Summative assessments are important; the results shine the light on inequities in our state education system and allow ODE to funnel resources and support to those who demonstrate the most need. However, summative assessments are not designed to drive instruction within the classroom. They are implemented on an annual basis and cover many content standards. Stakeholders want to focus resources on formative and interim/benchmark assessment practices that actually drive instructional decision-making in the classroom and serve to increase student achievement. Any additional costs incurred by the statewide assessment system that do not meet this end are not serving Oregon's students well, nor effecting the sentiment of our stakeholders. The $5.8 - $6.8 million dollar initial costs of switching to a nationally-recognized college entrance examination as Oregon's summative assessment required for accountability purposes must be considered within this lens; that is $5.8 - $6.8 million that will not be used to develop practices that we know actually increase student achievement in all areas, formative assessment practices.

Second, many stakeholders expressed concerns about statewide assessment opt out rates. The opt out rates are highest at the high school level, where Oregon saw a 94.5% participation rate at the high school level in English language arts and mathematics in 2016-17. The following school districts had high schools with 0% participation rates in mathematics last year: Annex, Bend/La Pine (La Pine Senior High School), Eugene 4J (Twin Rivers Charter School), Lincoln County (Newport High School & Toledo Senior High School), and Redmond (Redmond Proficiency Academy). This level of participation raises several concerns and must be addressed. ODE should consider district opt out practices to ensure that they are consistent with ODE policy, including Division 20 and 22.

Though the Every Student Succeeds Act was recently reauthorized, stakeholders encouraged ODE to do more to drive the discussion on standardized testing and the impact on instruction. This related to the desire to implement a balanced approach to assessment in Oregon. There is a desire to use innovative summative assessment techniques, such as matrix sampling, non-annual testing cycles, etc., to decrease the footprint of our statewide accountability assessment system. These changes are not allowed within our current federal accountability context, but are changes that our stakeholders want ODE to address with policymakers to help shape the next version of the Elementary and Secondary Education Act.

Finally, the processes that ODE uses to make changes such as the ACT/SAT high school assessment switch must be public and transparent. Stakeholders expressed concerns about the decision-making process and the lack of stakeholder engagement at the beginning of the effort, which the additional stakeholder engagement summarized in *Section 3* was an attempt to remedy. ODE must take care as this work moves forward to engage those impacted by the policies and decisions in an effort to increase engagement, support continuous improvement,

and also share the federal and state statutes and regulations that frame our efforts. In addition, all changes to the statewide assessment system have consequences. Stakeholders must be engaged in the discussion about all such changes to ensure that the system continues to reflect Oregon's educational values.

We appreciate your consideration of this body of evidence and references. The Assessment Team is available to address any questions that you may have related to the content. It is fitting that I acknowledge the substantive professional contributions, in the form of time, review, consultation, and writing, of two ODE employees: Holly Carter, Assessment Team Operations and Policy Analyst, and Meg Boyd, Strategic Communication Specialist. Their support made this project possible. However, any errors in this report are the sole responsibility of the lead author, Dan Farley, Interim Director of Assessment.

ATTACHMENT 1: Stakeholder Consultations

Table 1.1 Consultation

Group	Date & Outreach		Example Activities
Educators	January 2016	OEA Educational Symposium	**ESSA Technical Work Groups:** Of the nearly 160 technical work group participants, 35 represented teachers from across Oregon in various content areas and disciplines. **Deputy Superintendents Advisory Council** – This 35 member council represents elementary and secondary teacher leaders from across the state that convene quarterly to advise the Deputy Superintendent of Public Instruction and serving as critical thought partners. **Teacher Groups** – In partnership with the Oregon Education Association, teachers have received regularly updates on ESSA including scheduled feedback sessions and opportunities to add their voice to the conversation.
	April, May, June 2016	Technical Work Groups	
	September, December 2016, January 2017	Deputy Superintendent's Advisory Council	
	October 2016	Principal and Teacher Leader Conference (COSA)	
	January 2017	Licensed Staff Communicators, Salem-Keizer School District	
	February 2017	Salem-Keizer Education Association Licensed and Classified Staff	
Principals, administrators and other school leaders	July 2016	Malheur Summer Institute	**Principals, Administrators, and School Leaders –** ODE's partnership with the Confederation of School Administrators (COSA) has provided Oregon's administrators the opportunity to learn and provide feedback by engaging in critical conversations with ODE staff during conference presentations, work sessions, webinars, and surveys.
	August 2016	Assessment Institute (COSA)	
	August 2016	Odyssey Conference, Bend, Portland	
	August, October, December 2016; February 2017	Oregon's Statewide System of Support for Schools in Improvement	
	October 2016	Special Education Conference (COSA)	

Group	Date & Outreach		Example Activities
	October 2016	Teaching with a Purpose Conference	**Oregon's Statewide System of Support for Schools in Improvement** – Leadership coaches tasked with coaching and supporting building-level principals of schools identified for improvement and bringing together district-level personnel assigned to write and support improvement planning.
	November 2016	New Special Education Director's Conference	
	September 2016 and January 2017	OACOA/Superintendents Academy (COSA)	
	October and November 2016	New Principals Academy (COSA)	
	December 2016	Mentoring Network Meeting	
	December 2016	School Law Conference	
	January 2017	Winter Administrators Conference (COSA)	
Title IA Committee of Practitioners	February 2016 May 2016 November 2016, February 2017	Webinar meetings	**Committee of Practitioners (COPs)** advise ODE on rules, regulations and polices
Human Resource Directors	July, August, September 2016	Oregon School Personnel Association	**Oregon School Personnel Association** – Regional leadership convening of Human Resource Directors.
School Librarians; Paraprofessionals	October 2016	School Libraries & ESSA	**Oregon's School Librarians** – Librarians across the state have actively engaged in ESSA conversations by calling attention to how school libraries act as a support for all students.
	February 2017	Salem-Keizer Education Association Licensed and Classified Staff	**Oregon School Employee Association** – Supporting thousands of paraprofessionals across the state, OSEA's Board of Directors provided feedback and shared information on ESSA broadly with their members, encouraging them to attend regional feedback sessions facilitated by ODE staff.
	October, December 2016	Oregon School Employee Association	

Group	Date & Outreach		Example Activities
Charter School leaders; Private School Leaders	July, October 2016	ESSA & Charter Schools	**Charter School Engagement –** Charter School leaders engaged early in the development of Oregon's State Plan to provide feedback on work group recommendations and how new flexibility can work to strengthen charter schools in Oregon.
	August 2016	ESSA & Online Schools Meeting	
	November, December 2016	ESSA & Private Schools	
School Boards	July, November 2016	OSBA Conferences	**Oregon School Boards Association (OSBA) –** OSBA's summer and fall conference created mini sessions for ODE staff to engage with members of school boards statewide.
	December 2016	Medford School Board	
	January 2016	Salem-Keizer School Board	
Local ESD's (including those in rural areas)	August 2016	Willamette ESD	**Education Service District meetings with ODE Staff –** ESDs in Oregon have been engaged monthly through various channels to better understand how ODE can leverage their unique ability to support schools and districts.
	October, December 2016	ILC (Intra-ESD Council)	
	December 2016	OAESD Conference	
	January 2017	Malheur ESD	
	January 2017	Superintendents & ESD Superintendents	
Parents	July 2016	PTA parent forums and national webinar	**Parent Teacher Association (PTA) –** Representatives from Oregon's PTA have enlisted ODE's help in better understanding the new law to better communicate and share information with their constituents; PTA representatives attended community forums, participated in technical work groups and served on the ESSA Advisory Committee.
	November 2016	Migrant Parent conference	
	Spring 2016 & Winter 2017	Regional community forums	
Students	December 2016	Capitol Ambassadors, Student Council Representatives feedback session	**Capitol Ambassadors Program Feedback Session –** 45 regionally-represented student council members interested in public policy strengthened Oregon's State Plan by sharing
	January 2017	Leadership Students, Baker High School	

Group	Date & Outreach		Example Activities
	Spring 2016 & Winter 2017	Regional Community Forums	how the state and local districts can better support all students.
Civil Rights Organizations and Equity Advocates; EL and Communities of Color	January 2017	Self Enhancement Inc.	**EL Advisory Group –** This advisory group played a critical role in the development of the EL indicators and what they mean for students learning English as a second language in Oregon's classrooms. **Self Enhancement Inc. –** The largest nonprofit organization supporting African American students and historically underserved students in the greater Portland area provided great insight into building community based partnerships and strengthening the relationship between schools and community- based organizations (CBOs).
	January 2017	Latino Network	
	February 2017	Urban League	
	October 2016	House Bill 3499 Advisory Group	
	December 2016	Community Advisory Group	
	December 2016	Migrant Parents Conference	
	February 2017	House Bill 2016 Advisory Group	
	November 2016 – February 2017	EL Advisory Group	
Business Community Representatives	November 2017	Oregon Business Council	**School Visits –** Oregon's Deputy Superintendent had an opportunity to visit six different Career Technical Education programs and meet with business community representatives and educators to talk about strategies that engage all students.
	Spring 2016 & Winter 2017	Regional Community Forums; school visits	
Higher Education, Educator Preparation Programs, and Researchers	September, November 2016; January 2017	Oregon Coalition for Quality Teaching and Learning (OCQTL)	**Oregon Coalition for Quality Teaching and Learning –** Broad representatives from higher education and state education agencies (Early Learning, Chief Education Office) and partners and practitioners from across the state who meet bi-monthly, help to strengthen Oregon's plan through a collaborative process.
	January 2017	Higher Education Coordinating Commission Meeting	
	January 2017	Educator Preparation Leadership Cadre	
	Monthly Updates	Partner Meetings	

Group	Date & Outreach		Example Activities
Education Partners	September, November 2016; January 2017 December 2017	Oregon Coalition for Quality Teaching and Learning (OCQTL) Quarterly Communication Director's Partner Meeting	**Deputy Superintendent Monthly Partner Meetings –** Education partners from across the state including Stand for Children, Confederation of Oregon School Administrators, Oregon School Boards Association, Chalkboard Project, Oregon Education Association, Oregon Association for Education Service Districts, Chief Education Office, meet monthly with Oregon's Deputy Superintendent. These partners have served as critical thought partners and ambassadors in the development of Oregon's State Plan.
State Board of Education	August 2016 October and December 2016 June, July, October 2017, February 2017 January 2017 February 2017	State Board Retreat State Board Meeting ESSA Advisory Committee State Board Work session on ESSA ESSA State Plan First Reading	**State Board of Education –** The State Board of Education received regular updates on Oregon's State Plan development, including its engagement with stakeholders. Members on the State Board have attended regional community forums, participated in ESSA Advisory Committee meetings, served on technical work groups, and participated in tribal consultation.
Governor and Chief Education Office	September, November 2016; January 2017 Monthly Updates	Oregon Coalition for Quality Teaching and Learning (OCQTL)	**Governor & Chief Education Office –** Monthly updates on ESSA and Oregon's State Plan development process.
State Legislature	December 2016 January – February 2017	ESSA Update House & Senate Education Hearings	**State Legislature –** Deputy Superintendent Salam Noor and ODE Leadership provide updates on Oregon's State Plan progress and what the law means for Oregon's students, schools, and educators.
Early Learning	September 2016	Early Learning Council	**Early Learning Conference –** Participants provided feedback to

Group	Date & Outreach		Example Activities
	November 2016	Early Learning Conference Pre-K-3 (COSA) Oregon Coalition for Quality Teaching and Learning (OCQTL)	ODE staff, calling attention to the opportunities to strengthen Oregon's Plan by elevating early learning and the important role early education plays in a child's learning and growth.
Youth Development and adult learning agencies	September 2016 January 2017	Youth Development Council Youth Development and ESSA	**Youth Development –** Leaders from the Youth Development Division provided ongoing support by participating as active members on ODE's Internal Leadership Team for ESSA.

Table 1.2 Tribal governments and American Alaska Native engagement

Tribal Government	Date	Activities
Oregon's federally recognized governments	January-March 2017	ODE met with each of Oregon's 9 federally recognized tribes to seek input and inform the State Plan
	January 2017	Meeting with Coquille Indian Tribe
	January 2017	Meeting with Klamath Tribes
	January 2017	Meeting with the Confederated tribes of Grand Ronde
	January 2017	Meeting with the Confederated Tribes of Siletz
	February 2017	Meeting with Burns Paiute Tribe
	February 2017	Meeting with the Confederated Tribes of Umatilla Indian Reservation
	February 2017	Meeting with Cow Creek Band of Umpqua Tribe
	March 2017	Meeting with the Confederated Tribes of Warm Springs
	March 2017	Meeting with Confederated Tribes Coos, Lower Umpqua, and Siuslaw
Education Cluster (Government to Government) Representatives from 9 federally recognized tribes; primarily Education Directors, Tribal Education Committee members, and Tribal Council	July 2016, Sept 2016, Dec 2016, March 2017	ODE utilized quarterly meetings to solicit input on the State Plan

Tribal Government	Date	Activities
American Indian Alaska Native Advisory Panel; comprised of 25 members	July 2016, Sept 2016, Dec 2016, March 2017	ODE utilized its existing American Indian Alaska Native Advisory Panel to solicit input on the State Plan

ATTACHMENT 2: Standards & Assessment Workgroup Final Recommendations

The Workgroup's Charge

ESSA presents a real opportunity for states and districts to innovate more fully in designing systems and supports that can best advance college and career ready outcomes for all students. This opportunity for innovation also creates a particular need to focus on equity and capacity-building in ESSA implementation across the state. Specific to the Standards and Assessment Workgroup, they had the opportunity to:

- Clarify the prioritization and progression of content standards across grade levels to support school and district implementation of content expectations and effective instructional practices to ensure alignment to the standards.
- Evaluate how best to leverage available flexibility surrounding the high school assessment to promote equitable opportunities and outcomes for all of Oregon's students.

Workgroup Value Statement: Oregon students deserve an assessment system whose costs in time, energy, and resources are in balance with real benefits to students and educators: timely, usable feedback on learning. In the absence of such benefits, we must dramatically reduce the costs in time, energy, and resources of summative assessments for systems accountability. As these benefits increase, more costs may be justified.

Recommendation 1: ODE should continue engaging stakeholders to pursue funding and build local capacity in robust standards implementation and creation of a balanced assessment system (formative, interim, summative)

- Support high quality professional learning
    - to deepen formative assessment/instructional practices across content areas
    - use formative and interim assessments to monitor student growth and inform instruction
    - identify and develop effective and valid interim assessments
    - differentiate supports based on student need
    - understand grade-level standards and continuum of learning in each content area and across grade levels
    - develop performance-based assessments
- Mechanisms
    - Portal of resources - Communicating and sharing across districts/regions
        - Examples include but are not limited to:
            - Standards mapping
            - Interim & Formative assessments
            - Coherence maps
            - Curriculum maps
            - Performance assessments
            - Curriculum resources

        - Lesson plans
    - Teachers learning from teachers
        - Select and develop a regional cadre of teacher leaders to build capacity and serve as mentors/coaches
        - Research WA state ESD system for supporting professional learning
    - Funding for innovation pilots mentioned in the professional learning section
    - Work with universities to offer specializations centered on standards and assessment

Recommendation 2: ODE should investigate and pilot interim assessments that result in a single summative assessment score per ESSA flexibility regulations.
Recommendation 3: ODE should keep the high school grade of accountability at grade 11, but allow for early testing by students who meet the state criteria at an earlier time.

- Testing should be divided into content strands of ELA and math.
- Students are to be given one test opportunity in each content strand of ELA and math.
- ODE should explore providing access to testing throughout the academic school year.
- State criteria for early test administration need to be developed and rigorously applied. We recommend a multi-level task force to make these criteria consisting of experts and practitioners.

Recommendation 4: ODE should engage technical experts, stakeholders, and education partners to explore options for reducing the length and amount of time necessary to prepare for and administer the current statewide summative assessments across all tested grades. Evaluation of options to reduce test length and time should also continue to include a consideration of the level of information schools, teachers, and students need from the summative assessment so that an appropriate balance can be reached between precision and test length.
Recommendation 5: Oregon should support options and explore how to allow districts to use individual high school student flexibility of the summative assessment. All state-approved, nationally-recognized assessments need to provide comparable data that allows for statewide student performance evaluation. *If flexibility is not available at the individual student level, then* Oregon should explore how to allow districts to use another state-approved, nationally-recognized assessment in place of the high school statewide summative assessment.
Recommendation 6: ODE should develop a process for evaluating potential summative high school assessments for state approval that incorporates the following criteria in addition to any requirements established by federal law. All criteria would apply to *any* summative assessment the state may select (i.e. including the primary statewide summative assessment):

- Prospective assessments must provide *all* students with access to the same suite of accessibility supports offered through the current statewide summative assessments.
- Prospective assessments must ensure that students who test using accessibility supports will not be penalized in any way and will not have their results treated differently for any applications outside of meeting state and federal accountability requirements.

- Prospective assessments must offer a benefit for *each* student taking the test (e.g., providing students with detailed feedback and links to resources, eligibility for college admissions or placement, eligibility for scholarships) without differential treatment.
- Prospective assessments must ensure that assessment results are clear and reported in a timely manner to all interested parties.
- Oregon will ensure that options provide a direct benefit to the student beyond meeting graduation requirements. (i.e. college admissions, college and CTE credit, college placement, etc.)

Additional Considerations

While the formal recommendations listed above reflect the position of the majority of work group members, individual members also identified additional considerations which were captured at the final work group meeting on June 28th. These additional considerations and differing opinions are captured below.

Regarding Recommendation 1:

- If you allow time/money/capacity for districts to create/work on the creation of interim/formative assessments, remember the little districts—they don't have the capacity for this. Please create one for them to use.
- Identify districts who lead the state in areas of best practice and support them to help other districts who struggle in these areas
- If we go back to the 7 year standards adoption cycle, we need to give teachers time to become proficient in teaching to the "new" standards before assessing for accountability. At the same time, we need to avoid assessing on the old standards. We shouldn't be adopting all new standards every 7 years, but revising the ones we have so that it doesn't take so long to get good at them.

Regarding Recommendation 5:

- The current high school summative assessment system is not meeting the needs of all our students such as meeting special individual student needs and providing meaningful student benefits. Therefore, we need to consider fixes such as flexibility options. Ideally the system should be designed to meet all the student, district, state, and national needs.
- Flexibility is a crutch for a broken test system

Regarding Recommendation 6:

- Any high school summative assessment should be evaluated in relation to three purposes in the order of these priorities:
    - Does the assessment measure individual student achievement on "essential skills"?
    - Does the assessment provide the individual student access to post-high school opportunities?
    - Does the assessment provide adequate data for systems accountability?

- Students should not have to be subjected to testing and retesting for system benefit; define guidelines to protect students
- We need to define what we want from our assessment first and ask only for data we will use from our assessment
- We really need to get rid of SBAC

ATTACHMENT 3: Vendor Response Summary

The following is a summary of the information submitted in response to the RFI from both respondents, ACT and College Board. For almost every section of the RFI a matrix was provided for a direct response to the questions posed with opportunity extended for additional information to be provided. A team of ODE staff reviewed the responses submitted by ACT and College board and selected salient quotes from those documents for the purpose of this summary. These are indicated by the subheading "Vendor Explanation."

An explicit purpose of an RFI is to gather information to inform the preparation of any subsequent RFP. For many of the items on the RFI, potential lines of further questioning or considerations for the RFP from the review team have been noted and included in this summary under the subheading "ODE Staff Comments."

3.1 Assessment Design Attributes

3.1.1 Assessed Content Areas

Please identify whether you offer a summative high school assessment in each of the following content areas.

	ACT	College Board
Math	Yes	Yes
ELA (reading)	Yes	Yes
ELA (writing)	Yes	Yes
ELA (listening)	No	No
ELA (speaking)	No	No

Vendor Explanation:

- ACT: "The ACT is a curriculum- and standards-based educational and career planning tool that assesses and reports students' academic readiness for postsecondary education and career. The ACT is oriented toward the general content areas of college and high school instructional programs."
- College Board: "As an assessment, [the SAT] plays a critical role in measuring student achievement and readiness and in helping students make successful transitions into college and workforce training programs after high school graduation…The SAT is organized into four tests: a Reading Test, a Writing and Language Test, a Math Test, and an optional Essay Test, which is a direct-writing task."

3.1.2 Content Standard Alignment

Please identify whether your summative high school assessment is criterion-referenced, answering separately for each of the following content area assessments:

	ACT	College Board
Math	Yes	Yes
ELA	Yes	Yes

Vendor Explanation:

- ACT: "The ACT is a nationally normed, criterion-referenced college and career readiness assessment. A criterion-referenced interpretation of ACT scores is obtained through the application of ACT's College Readiness Benchmarks. Students, parents, and counselors can use the Benchmarks to determine the academic areas in which students are ready for college course work, and areas in which they may need more work."
- College Board: "Each assessment in the SAT suite has an associated set of metrics called the college and career readiness benchmarks. The new college and career readiness benchmarks are based on actual student success in entry-level college courses."

ODE Staff Comments:

ORS 329.485 requires ODE to implement for all students statewide a valid and reliable assessment system that meets technical adequacy standards and includes criterion-referenced assessments including performance-based assessments, content-based assessments, and other valid methods to measure the academic content standards and to identify students who meet or exceed the standards. ORS 329.485(1) defines "Criterion-referenced assessment" as "testing of the knowledge or ability of a student with respect to some standard." Based on the vendor responses to

the RFI, it remains unclear whether the assessments described in the RFI responses meet this definition of "criterion-referenced assessment." To ensure compliance with Oregon law, ODE plans to include a more precise definition in the RFP during the next phase of the proposed procurement process.

Please identify the percentage of items in use on your summative high school assessment that were developed based on the high school Common Core State Standards, answering separately for each of the following content area assessments:

	ACT	College Board
Math	100%	N/A
ELA	100%	N/A

Vendor Explanation:

- ACT: "The ACT is a strong match with CCSS and NGSS. ACT's extensive research results in an empirically based, externally validated vertical scale that measures college and career readiness in each of the content areas including English, mathematics, reading, science and writing…there is significant overlap between the Common Core State Standards and the college and career readiness skills that ACT measures. ACT tests are designed to measure student preparedness to achieve their academic and workplace goals."
- College Board: "The [SAT] is a profoundly meaningful assessment that is thoroughly transparent and aligned to critical high school outcomes, best instructional practices, and the Oregon state standards."

ODE Staff Comments:
Based on the vendor responses to the RFI, the extent to which the assessments described in the RFI responses align to Oregon's adopted content standards remains unclear. To ensure alignment—a required component for federal peer review approval—ODE plans to include a requirement that vendors submit an independent alignment study in the RFP during the next phase of the proposed procurement process.

3.1.3 Test Format
Please identify whether your summative high school assessment is available as an online test, a paper-based test, or in multiple formats; select all that apply:

	ACT	College Board
Math	Online (fixed form) Paper-based	Online (fixed form) Paper-based
ELA	Online (fixed form) Paper-based	Online (fixed form) Paper-based

Vendor Explanation:

- ACT: "ACT offers states the flexibility to choose between online or paper testing."
- College Board: "The SAT will be available for both online and paper-based administration in the 2018-2019 school year."

If online, please identify whether your summative high school assessment is compatible for presentation through a third party test delivery system.

ACT	College Board
Yes	No

Vendor Explanation:

- ACT: "ACT tests are currently administered on an ACT approved platform…ACT would be open to providing the test on another third-party test delivery system pending a thorough review of the security and functionality of the identified platform."
- College Board: "We are working exclusively with AIR Assessment to ensure that the SAT can be appropriately and securely delivered on their Test Delivery System (TDS) platform."

ODE Staff Comments:
To ensure compatibility with Oregon's current online test delivery system hosted by the American Institutes for Research (AIR), ODE plans to include the specific technical requirements of AIR's online system in the RFP during the next phase of the proposed procurement process. ODE will also include questions in the RFP to specifically ascertain whether there would be additional cost considerations for delivering the vendor's assessment through AIR's online test delivery system.

3.1.4 Educator Involvement Opportunities
Please identify whether there is an opportunity for Oregon educators to be involved in item development.

ACT	College Board
Yes	Yes

Vendor Explanation:

- ACT: "ACT engages educators nationwide in every step of the item/form development process…Item writers come from all over the US and educators often serve in that capacity. Educators also serve on our fairness and bias review committee, which review items and forms."
- College Board: "College Board content test specialists work closely with educators on a contractual basis as they submit test questions to be included in the SAT pool of items. College Board also works closely with educators throughout the nation in reviewing all test questions prior to pretesting them and prior to placing them on an operational form…College Board's Assessment Design and Development department would welcome any and all nominations for Oregon educators to work with our assessment specialists to craft and/or review test items."

ODE Staff Comments:
ODE plans to include questions to more clearly identify opportunities for including Oregon educators in the item development process as an ODE-facilitated professional development opportunity in the RFP during the next phase of the proposed procurement process.

3.2 Assessment Administration Attributes

3.2.1 Test Windows
Please identify whether test administration must occur within a specified window of time.

ACT	College Board
Yes	Yes

Vendor Explanation:

- ACT: "ACT will provide an opportunity for ODE to select an initial test date, a make-up test date, and an emergency test date."
- College Board: "The College Board offers administration dates in the fall and spring. ODE may choose a primary and make up test date...Online test administration will occur over multiple days."

ODE Staff Comments:
Both vendors indicated that administration of their test would be limited to two dates—an initial or primary test date and a make-up test date. Given that Oregon schools are currently used to having several months over which to complete testing, ODE will need to engage with stakeholders to determine the likely impact of this potential transition on local scheduling and resource allocation processes.

In addition, both vendors who responded to ODE's RFI indicated that their testing dates were predominantly scheduled before May 1st. Given ODE's accountability requirements that calculate a school or district's performance and participation rates based on student enrollment on the first school day in May, ODE plans to include criteria in the RFP to ensure compliance with ODE's accountability requirements during the next phase of the proposed procurement process.

3.2.2 Test Scheduling

Please identify whether your summative high school assessment is a timed test.

ACT	College Board
Yes	Yes

Vendor Explanation:

- ACT: "The ACT English, mathematics, reading, and science tests are delivered as a battery of subject tests in a single session, which lasts approximately four hours, including directions and a 15-minute break between mathematics and reading. If the writing test is administered, note the time that would need to be added to the estimate, and it must be administered on the same day as the entire battery of tests."
- College Board: "In order to ensure a standardized testing experience, each test component…is timed and cannot be administered independently of the other portions of the assessment. The following table lists the allotted time and number of questions per section:

Components	Time Allotted (minutes)	Number of Questions/Tasks
Reading	65	52
Writing and Language	35	44
Essay (Optional)	50	1
Math	80	58
Total Testing Time	**180 (230 with optional Essay)**	**154 (155 with optional)**

Students who are approved to test with accommodations that are related to time limits and scheduling may receive one of the following testing options in a specialized testing environment:

  - Frequent breaks
  - Extended time
  - Multiple day (may or may not include extra time)

Please indicate whether your summative high school assessment may be administered over multiple days.

ACT	College Board
Yes	Yes

Vendor Explanation:

- ACT: "In order to provide a fair and valid testing experience for all students and to successfully measure students' skills, the ACT tests are administered to most students in a single session in a secure environment with appropriately trained proctors at a designated testing site…Students who require accommodated testing which includes testing over multiple days may test with ACT Non-College Reportable Accommodations."
- College Board: "The typical SAT SD test administration takes place within a single testing session over the course of one test day. ODE may choose a primary and make up test day for the test administration…certain students may receive approval to test with an accommodation that will allow for their test administration to take place over multiple days."

3.2.3 Testing Time

Please identify both the median testing time and the amount of time required for 80% of students to complete your summative high school assessment measured in minutes, answering separately for each of the following content area assessments:

	ACT		College Board	
	Median test time	80th Percentile test time	Median test time	80th Percentile test time
Math	55 minutes	58 minutes		

ELA	39 minutes (English) 31 minutes (reading) 33 minutes (writing) Total103 minutes	42 minutes (English) 33 minutes (reading) 39 minutes (writing) Total 114 minutes	Due to test paper-pencil format, College Board was not able to conform to RFI format.

Vendor Explanation:

- College Board: "The majority of students who take the SAT complete each section of the assessment within the required allotted time."

ODE Staff Comments:
ODE plans to include questions that identify testing time statistics disaggregated by student group in the RFP during the next phase of the proposed procurement process.

3.2.4 Test Opportunities
Please identify the number of annual test opportunities available for individual students:

ACT	College Board
7	6 School Day;7 Nat'l Admin

Vendor Explanation:

- ACT: "For statewide adoptions, the ACT is typically administered once in the spring statewide but is also offered in the fall…several test date options are made available, in which ODE would be able to select an initial test date, a makeup test date, and a test date to use for emergency purposes should unforeseen events…prevent students from testing on the initial or makeup test date. Online testing offers even more flexibility with a two-week testing window."
- College Board: "ODE school districts may choose from 6 school day administrations…we recommend that ODE a paper based administration of SAT SD. With this option, ODE may choose a primary and make-up test day for the test administration (i.e., two annual test opportunities)."

ODE Staff Comments:
Both vendors who responded to the RFI appeared to have interpreted "test opportunities" as referring to statewide testing dates. ODE plans to include clarification that "test opportunities" refers to the number of times an individual student may test annually in the RFP during the next phase of the proposed procurement process.
Please identify whether your summative high school assessment offers off-grade test opportunities (i.e., 9th, 10th, and 12th grades):

ACT	College Board
Yes	Yes

Vendor Explanation:

- ACT: "For statewide implementation, typically the ACT is administered to 11th or 12th grade students; however, states may also include 10th in the statewide administration."
- College Board: "SAT SD is one component of the SAT Suite of assessments."

ODE Staff Comments:
Given that one of the vendors who responded to the RFI appears to have indicated that off-grade testing would be accomplished through the administration of separate assessments in a suite of assessments, ODE plans to include questions that specifically determine whether off-grade testing would require the purchase of additional assessments and any resulting cost implications in the RFP during the next phase of the proposed procurement process.

3.2.5 Technology requirements
Please identify whether any technology requirements apply to test administration:

ACT	College Board
Yes	Yes

Vendor Explanation:

- ACT: "School equipment must meet hardware, software, and other technical requirements defined by ACT, and performed during site readiness."
- College Board: "AIR's Test Delivery System supports a wide range of operating systems and hardware."

ODE Staff Comments:

To ensure compatibility with Oregon's current online test delivery system hosted by AIR, ODE plans to include the specific technical requirements of AIR's online system in the RFP during the next phase of the proposed procurement process.

3.2.6 Accessibility Options

Please identify whether your summative high school assessments include the following accessibility support options:

	ACT	College Board
Read-aloud or text-to-speech (for online only)	Yes	Yes
Large print presentation	Yes	Yes
Braille presentation (Nemeth)	Yes	Yes
Signed Representation	Yes	Yes
Closed captioning (for online only)	No	No
Full Spanish translation	Yes	N/A
Dictation to scribe or speech-to-text (for online only)	Yes	Yes
Language of origin response option (for short answer and extended constructed response)	N/A	N/A

Vendor Explanation:

- ACT: "For Signed Representation ACT allows Exact English Signing or Cued Speech signing for test items. If approved, an administration with these accommodations results in a college reportable score. ACT allows signing of the test instructions in American Sign Language (ASL). Signing of the test items in ASL would result in a non-college reportable score. Full Spanish translation of the math test is allowed, at an additional cost. Scores obtained are non-college reportable."
- College Board: "The College Board currently uses Nemeth (the braille math system)…Beginning in 2017-2018 the College Board will offer Unified English Braille (UEB)…ELL students will have access to testing instructions in several languages and approved word-to-word bilingual glossaries. The College Board offers Exact English Signing (EES) Interpreter for all College Board test questions and instructions. Both Exact English Signing and American Sign Language are permitted for oral instructions. Please note that American Sign Language (ASL) is not permitted for test questions. Assistive technology compatible (ATC) is a digital test in word format that is delivered on a flash drive and enables students with disabilities to use assistive technology to access test content on a computer. The ATC is designed to work with a variety of assistive technologies. In addition to the ability to enlarge text on screen, the ATC format, using the applicable software, can read the test to the test taker…In 2018-2019 the College Board will offer an online test delivery system that will be accessible to students with disabilities. Some of the accessibility features will be universal and available to all students; others will require approval by the College Board's Services for Students with Disabilities…In order to test with accommodations and receive reportable scores, students must be approved by the College Board's Services for Students with Disabilities (SSD)…Students who take the SAT with approved accommodations receive test scores in the same manner as students who test without accommodations…In addition to College Board-approved accommodations, the College Board supports State-Allowed Accommodations (SAA). SAAs are in place to provide accommodations or supports to students who want to use accommodations that are not approved by the College Board for college-reportable scores. State Allowed Accommodations (SAA)

are ONLY intended for students who would not be eligible for College Board SSD accommodations (e.g., English Language Learners – students who do not have a disability but need accommodations because they are still learning English). Certain accommodations for students with an IEP or 504 Plan are not presently allowed through College Board. This includes the use of American Sign Language or ASL for test questions for students who use that method of communication…ELL students will have access to testing instructions in several native languages and approved word-to-word bilingual glossaries…Additionally, in the future, ELL students can also receive extended testing time (up to time and a half) and the opportunity to test in an environment with reduced distractions. Students will need to apply to receive the testing time and specialized testing environment accommodations using the process described previously in this section…In order to test with accommodations and receive reportable scores, students must be approved by the College Board's Services for Students with Disabilities (SSD)."

ODE Staff Comments:
Given that both vendors who responded to the RFI indicated that their accessibility offerings were more limited than Oregon's current statewide high school summative assessment and also indicated a more restrictive process for approving use of offered accessibility supports, ODE plans to include more detailed questions regarding vendors' accessibility support approval process to ensure compliance with ODE's accessibility policies in the RFP during the next phase of the proposed procurement process. In response to comments made by both vendors that indicated that tests administered with certain accessibility reports may not be college reportable, ODE also plans to include additional criteria in the RFP to ensure that the use of accommodations does not deny any student equitable benefit compared to students who do not use accommodations, consistent with the ODE's equity lens and requirements within ESSA.

3.2.7 Test Administration
Please identify whether any training requirements or other restrictions apply regarding who may administer your assessment and describe such requirements and/or restrictions.

ACT	College Board
Yes	Yes

Vendor Explanation:

- ACT: "Prior to testing day, ACT will provide a series of administration training sessions for the assessment coordinators and other key testing staff on how to administer the ACT. Key personnel will receive appropriate training through test administration webcasts and live webinars." ACT staff will provide answers to questions and help each school's appointed Test Coordinator assess readiness for the administration…ODE can rely on ACT's successful track record of training thousands of school staff each year to administer the ACT in states where we provide statewide testing, as well as for many individual school districts."
- College Board: "The College Board has an established training and support system for ODE administrators and educators when implementing SAT Suite of Assessment programs in their schools. This system will be customized in concert with ODE for state, district, and school site staff."

ODE Staff Comments:
Given that federal peer review requirements hold ODE directly accountable for ensuring consistent training and consistent, valid, and secure test administration for all students, ODE plans to include questions to more clearly determine the degree to which ODE will retain authority in the training of test administration staff and in monitoring and resolving breaches of test security in the RFP during the next phase of the proposed procurement process.

3.3 Assessment Scoring Attributes

3.3.1 Scoring Method
Please identify the scoring method(s) used for your summative high school assessment:

	ACT	College Board
Math	Computer-scored	Computer-scored

ELA	Computer-scored Human-scored	Computer-scored Human-scored

Vendor Explanation:

- ACT: "All test components are computer/machined scored, with the exception of the ACT writing test. Writing is 100 percent human-scored, with each essay being reviewed by at least two independent raters."
- College Board: "Most multiple choice and student produced response question responses are scored by Scantron machines that read the bubbled response on scannable answer sheets…Essay scoring is performed by human raters who are trained and continually certified to score Essay responses."

ODE Staff Comments:

ODE plans to include questions regarding scoring and reporting methodology in the RFP during the next phase of the proposed procurement process.

3.3.2 Scoring Speed

Please identify the turnaround time for the scoring of your summative high school assessment from the time of test administration to the distribution of student score reports:

	ACT			College Board		
	Minimum turnaround time	Average turnaround time for scoring	Maximum turnaround time	Minimum turnaround time	Average turnaround time for scoring	Maximum turnaround time
Math	2 weeks	2 weeks	8 weeks	3 weeks	4 weeks	8 weeks
ELA	4 weeks	4 weeks	8 weeks	3 weeks	4 weeks	8 weeks

Vendor Explanation:

- ACT: "Score reports can take up to eight weeks to report, however 80 percent of students receive their scores within two weeks, with an additional two weeks to score the writing test."
- College Board: "Generally, standard student assessment results (i.e. assessment results that will be used for college entrance examination purposes) are available two months following the state's last test administration date via the College Board reporting portal."

3.3.3 Educator Involvement Opportunities

Please identify whether your summative high school assessment offers an opportunity for Oregon educators to be involved in the scoring of assessments.

ACT	College Board
Yes	Yes

Vendor Explanation:

- ACT: "ACT's scoring pool includes 13,300 experienced distributed scorers, and 119,200 screened scorer applicants. At ODE's request, ACT can target Oregon teachers and residents to recruit as scorers."
- College Board: "If ODE chooses to administer the optional essay component of the SAT as part of their summative high school assessment, there may be opportunity for Oregon educators to be involved in the scoring of assessments."

3.4 Assessment Reporting and Data Management Attributes

Please describe your processes for maintaining the security and confidentiality of student records in compliance with the Family Educational Rights and Privacy Act (FERPA) and other data privacy laws. Student test records must be identified with Oregon's Secure Student Identifier (SSID). Please describe your processes for maintaining student identification across multiple systems.

Vendor Explanation:

- ACT: "For data security, ODE can be confident that ACT will meet the requirements of the Family Educational Rights and Privacy Act (FERPA), the Every Student Succeeds Act (ESSA), IDEA and the US Department of Education's Peer Review of State Assessment Systems…All data stored within the ACT network is secured. Field level encryption is in place for highly sensitive information (such as SSNs) when data is stored in databases, files and systems."
- College Board: "The College Board embraces industry standards for data security…College Board's application development activities follow secure procedures throughout the development lifecycle and the policy details tehse steps and references the OWASP best practices for web development…College Board manages student data in accordance with the Family Educational Rights and Privacy Act (FERPA) protecting student educational records to the extent the data is applicable."

3.5 Pricing Information

3.5.1 Fixed and Per-Student Costs

ACT	College Board
with writing: $56.50 per student without writing: $40 per student	**with essay: $51 per student** without essay: $39 per student

Vendor Explanation:

- ACT: "Per student pricing assumes statewide implementation in Oregon and remains constant regardless of mode (online or paper). ODE would only be charged for the number of tests processed at the above listed rate."
- College Board: "The below pricing is for a state-wide implementation of the SATSD. Paper and computer based testing cost the same. Pricing is all inclusive and includes standard project management, training and communication fees. Customization of our standard offering may result in additional cost."

3.5.2 Services Provided

For the per-student cost identified above, please identify what products or services associated with your summative high school assessment are included:

	ACT	College Board
Technical documentation	Yes	Yes
Test forms	Yes	Yes
Test administration	Yes	Yes
Training	Yes	Yes
Scoring	Yes	Yes
Psychometric services	Yes	Yes
Reporting	Yes	Yes
Other	Yes	Yes

Vendor Explanation:

- ACT: "The ACT is an off-the-shelf solution and includes all the requested items above at no additional cost. State, District, School and Student reports are included in the per student pricing but customized technical reports or other custom data reports would be an additional cost."

ODE Staff Comments:

ODE plans to include the specific peer review criteria and necessary technical documentation as a requirement in the RFP during the next phase of the proposed procurement process. ODE also plans to include a requirement in the RFP specifying that vendors provide students, educators, and parents with access to practice tests with the same functionality and accessibility supports as the operational assessments.

3.6 Peer Review

Please identify whether your summative high school assessment is currently in use by another state for the purposes of meeting federal assessment requirements:

ACT	College Board
Yes	Yes

If yes, please identify whether your summative high school assessment as it is currently being implemented in other states has passed federal peer review requirements:

ACT	College Board
N/A	Yes

Vendor Explanation:

- ACT: "Wyoming, Wisconsin, and Montana are currently using the ACT test as their high school assessment for federal accountability in 2016-17. Wisconsin partially met federal peer review requirements for math and ELA based on its May 2016, peer review submission. Since receiving this feedback in December 2016, ACT has worked closely with the Wisconsin Department of Public Instruction to devise a plan and timeline for fully meeting the remainder of the requirements, for example by supporting an independent alignment study and the development of Performance Level Descriptors. ACT also supported Wyoming in its March 2016 peer review submission, which again partially met federal requirements for math and ELA. Montana intends to submit evidence for the ACT in ELA a nd math for peer review in December 2017. ACT is working with the state to support this submission, and is also supporting Nebraska, Nevada, and Oklahoma, who are pursuing use of the ACT as the sole, or one option for, state high school assessment."
- College Board: "Seven (7) states administer the SAT SD statewide for state and federal accountability purposes (Maine, New Hampshire, Connecticut, Deleware, Michigan, Colorado, Illinois). These states are currently undergoing peer review and expect to receive guidance from the U.S. Department of Education later this year or in early 2018."

ODE Staff Comments:

The College Board's description conflicts with their response of "Yes" in the table above identifying whether use of their assessment has passed federal peer review requirements. Given this ambiguity, ODE plans to include requirements that vendors submit evidence of successful, approved peer review submission to substantiate all claims in the RFP during the next phase of the proposed procurement process.

3.7 Test Design Documentation

Please identify which of the test design documents for your summative high school assessment are publicly available:

	ACT	College Board
Test specifications	Yes	Yes
Test blueprints	Yes	Yes
Item development specifications	No	Yes
Representative sample of items	Yes	Yes
Data from text complexity analyses	No	Yes
Specifications for the various levels of cognitive demand	Yes	Yes

STATE OF OREGON

COVER PAGE

Oregon Department of Education

Request for Information (RFI)

Summative High School Assessment

RFI-ORPIN Notice ODE- XXXXX

Date of Issue: May 9, 2017

Closing Date: June 8, 2017*

Issuing Office: Oregon Department of Education, Procurement Services

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It is a policy of the State Board of Education and a priority of the Oregon Department of Education that there must be no discrimination or harassment on the grounds of race, color,

sex, marital status, religion, national origin, age, sexual orientation, or disability in any educational programs, activities or employment. For more information, visit the Anti-Discrimination Policy page at http://www.oregon.gov/ode/rules-and-policies/Pages/Anti-Discrimination-Policy.aspx..

SECTION 1 – OVERVIEW

1.1 Introduction

This Request for Information (RFI) is intended to furnish information to the Oregon Department of Education (ODE) as part of the review and selection process for Oregon's statewide high school assessments used to meet state and federal accountability requirements.

1.2 Contract Awards

No contracts will be awarded as a result of this RFI.

The issuance of this RFI may or may not result in an Invitation to Bid (ITB) or a Request for RFI response (RFP).

1.3. Cost of Preparing and Submitting Information

All costs incurred in preparing and submitting a response to this RFI will be the responsibility of the Vendor and will not be reimbursed by ODE.

SECTION 2 – BACKGROUND

2.1 Background

Oregon adopted the Common Core State Standards in Math and English Language Arts in 2010 and the Next Generation Science Standards in 2014. These standards provide a consistent and rigorous set of learning expectations across the states that have adopted them and will help prepare our students to compete nationally and internationally.

Federal law requires states to annually assess their students in the academic content areas of mathematics, English language arts, and science. For federal purposes, the objective of these academic assessments is to serve as the primary means of determining the yearly performance of the State and each local education agency (LEA) and school in the State in enabling all children to meet the state's academic achievement standards and to measure student growth.

Oregon law requires the ODE to implement for all students statewide a valid and reliable assessment system that meets technical adequacy standards. The assessment system shall include criterion-referenced assessments including performance-based assessments, content-based assessments, and other valid methods to measure the academic content standards and to identify students who meet or exceed the standards. Oregon law further requires the ODE be involved in the development of tests used in our state. ODE's direct involvement throughout the test development process ensures the resulting assessments are authentic, of high quality, and

provide relevant information about student learning, and that Oregon's assessment system is building the assessment capacity of Oregon educators through participation in development.

Oregon currently administers the Smarter Balanced assessments in math and English language arts at grades 3 through 8, and 11, with a grade 12 optional retest opportunity not used for accountability purposes. For science, Oregon currently administers the Oregon Assessment of Knowledge and Skills (OAKS) at grades 5, 8, and high school. Grade 11 is the high school grade of accountability but students have the option to test early in grades 9 and 10, along with a grade 12 retest opportunity not used for accountability purposes. Based on feedback received from stakeholders statewide during the development of Oregon's state plan under the federal Every Student Succeeds Act, ODE is currently investigating summative high school assessment options that will best satisfy federal and state assessment requirements while also supporting the values of Oregon communities. The goal is to ensure Oregon's statewide high school assessment provides students, families, and educators with accurate and timely information about whether students are ready for college, career, and civic life.

SECTION 3 – SUMMATIVE HIGH SCHOOL ASSESSMENT ATTRIBUTES

ODE is requesting the following key pieces of information from interested Vendors with regard to their summative high school assessment offerings in the content areas of math, English language arts (ELA) (reading, writing, listening, and speaking), and science. If your response differs by content area assessment, please respond separately for each content area.

All questions must be answered using the format provided by ODE. While Vendors may choose to supplement the required response with additional evidence, questions not answered in the format provided by ODE may not be considered during ODE's review.

3.1 Assessment Design Attributes

3.1.1 Assessed Content Areas

Please identify whether you offer a summative high school assessment in each of the following content areas. For those content areas marked "no," Vendors should respond to all subsequent questions as "n/a":

	Yes	No
Math		
ELA (reading)		
ELA (writing)		
ELA (listening)		
ELA (speaking)		
Science		

Additional information (optional):

3.1.2 Content Standard Alignment

Please identify whether your summative high school assessment is criterion-referenced, answering separately for each of the following content area assessments:

	Yes	No	N/A
Math			
ELA			
Science			

Additional information (optional):

Please identify the percentage of items in use on your summative high school assessment that were developed based on the high school Common Core State Standards, answering separately for each of the following content area assessments:

	Percentage	N/A
Math		
ELA		

Please identify the percentage of items in use on your summative high school assessment that were developed based on the high school Next Generation Science Standards.

	Percentage	N/A
Science		

Additional information (optional):

3.1.3 Test Format

Please identify whether your summative high school assessment is available as an online test, a paper-based test, or in multiple formats, answering separately for each of the following content area assessments; select all that apply:

	Online (fixed form)	Online (computer-adaptive)	Paper-based	N/A
Math				
ELA				
Science				

Additional information (optional):

If online, please identify whether your summative high school assessment is compatible for presentation through a third party test delivery system.

	Yes	No	N/A
Math			
ELA			
Science			

Additional information (optional):

3.1.4 Educator Involvement Opportunities

Please identify whether there is an opportunity for Oregon educators to be involved in item development. If your response differs by content area assessment, please respond separately for each content area.

Yes	No

Additional information (required for all "yes" responses):

3.2 Assessment Administration Attributes

3.2.1 Test Windows

Please identify whether test administration must occur within a specified window of time.

Yes	No

If yes, please describe the specific test window restrictions that apply (e.g., a specified date or date range, number of days)

Additional information (optional):

3.2.2 Test Scheduling

Please identify whether your summative high school assessment is a timed test.

Yes	No

If yes, please describe all specific restrictions that apply (e.g., time limits), identifying whether additional testing time is available as an accessibility support for individual students and under what conditions.

Please indicate whether your summative high school assessment may be administered over multiple days.

Yes	No

If yes, please describe all restrictions that may apply (e.g., the number of days a student may use to complete the test).

Additional information (optional):

3.2.3 Testing Time

Please identify both the median testing time and the amount of time required for 80% of students to complete your summative high school assessment measured in minutes, answering separately for each of the following content area assessments:

	Median test time	80th Percentile test time	N/A
Math			
ELA			
Science			

Additional information (optional):

3.2.4 Test Opportunities

Please identify the number of annual test opportunities available for individual students, answering separately for each of the following content area assessments:

	Number of annual test opportunities	N/A
Math		
ELA		
Science		

Additional information (optional):

Please identify whether your summative high school assessment offers off-grade test opportunities (i.e., 9th, 10th, and 12th grades), answering separately for each of the following content area assessments:

	Yes	No	N/A
Math			
ELA			
Science			

Additional information (required for all "yes" responses):

3.2.5 Technology requirements

Please identify whether any technology requirements apply to test administration, answering separately for each of the following content area assessments:

	Yes	No	N/A
Math			
ELA			
Science			

Additional information (required for all "yes" responses):

3.2.6 Accessibility Options

Please identify whether your summative high school math assessment includes the following accessibility support options:

	Yes	No	N/A
Read-aloud or text-to-speech (for online only)			
Large print presentation			
Braille presentation (Nemeth)			
Signed Representation			
Closed captioning (for online only)			
Full Spanish translation			
Dictation to scribe or speech-to-text (for online only)			
Language of origin response option (for short answer and extended constructed response)			

For each accessibility support included in your assessment, please describe any restrictions that apply, either to eligibility for the accessibility support or for the use of scores, including college reportable scores, derived from tests administered with the accessibility support.

Additional information (optional):

Please identify whether your summative high school ELA assessment includes the following accessibility support options:

	Yes	No	N/A
Read-aloud or text-to-speech (for online only)			
Large print presentation			

Braille presentation (UEB)			
Signed Representation			
Closed captioning (for online only)			
Full Spanish translation			
Dictation to scribe or speech-to-text (for online only)			
Language of origin response option (for short answer and extended constructed response)			

For each accessibility support included in your assessment, please describe any restrictions that apply, either to eligibility for the accessibility support or for the use of scores derived from tests, including college reportable scores, administered with the accessibility support.

Additional information (optional):

Please identify whether your summative high school science assessment includes the following accessibility support options:

	Yes	No	N/A
Read-aloud or text-to-speech (for online only)			
Large print presentation			
Braille presentation (Nemeth)			
Signed Representation			
Closed captioning (for online only)			
Full Spanish translation			
Dictation to scribe or speech-to-text (for online only)			
Language of origin response option (for short answer and extended constructed response)			

For each accessibility support included in your assessment, please describe any restrictions that apply, either to eligibility for the accessibility support or for the use of scores derived from tests, including college reportable scores, administered with the accessibility support.

Additional information (optional):

3.2.7 Test administration

Please identify whether any training requirements or other restrictions apply regarding who may administer your assessment and describe such requirements and/or restrictions, answering separately for each of the following content area assessments.

	Yes	No	N/A
Math			
ELA			
Science			

Please description of the requirements and/or restrictions for test administration training, including timing required for training LEA staff, if applicable:

Additional information (optional):

3.3 Assessment Scoring Attributes

3.3.1 Scoring Method

Please identify the scoring method(s) used for your summative high school assessment, answering separately for each of the following content area assessments; check all that apply:

	Human-scored	Computer-scored	N/A
Math			
ELA			
Science			

Additional information (optional):

3.3.2 Scoring Speed

Please identify the turnaround time for the scoring of your summative high school assessment from the time of test administration to the distribution of student score reports, answering separately for each of the following content area assessments:

	Minimum turnaround time	Average turnaround time for scoring	Maximum turnaround time	N/A
Math				
ELA				
Science				

Additional information (optional):

3.3.3 Educator Involvement Opportunities

Please identify whether your summative high school assessment offers an opportunity for Oregon educators to be involved in the scoring of assessments. If your response differs by content area assessment, please respond separately for each content area.

Yes	No

Additional information (required for all "yes" responses):

3.4 Assessment Reporting and Data Management Attributes

3.4.1 Receiving secure data

To support implementation of Oregon's statewide assessment system, the Vendor for Oregon's statewide high school assessment will receive lists of all students enrolled in 9 through 12 institutions in the state of Oregon, including enrollment, demographic, and program information. This will include an initial upload of up to 200,000 students and nightly updates during testing windows.

Please describe your systems and capabilities for receiving secure student information from ODE.

3.4.2 Sending secure data

The Vendor for Oregon's statewide high school assessment will need to report to ODE student level score files and individual item response files for all assessments delivered by the Vendor, meeting the State's file format requirements. The student level file will include scores, sub-scores, and information on individual test attributes. Response files will include item identifiers and responses. We expect the Vendor will deliver 40,000 to 60,000 assessments by content area per tested grade annually. The item level files will contain one row for each student and each item delivered to the student.

Please describe your systems and capabilities for sending student test record data to ODE.

3.4.3 Data Security

Please describe your processes for maintaining the security and confidentiality of student records in compliance with the Family Educational Rights and Privacy Act (FERPA) and other data privacy laws.

Student test records must be identified with Oregon's Secure Student Identifier (SSID). Please describe your processes for maintaining student identification across multiple systems.

3.5 Pricing Information

This information is for budget planning purposes only and does not constitute a bid for services.

3.5.1 Fixed and Per-Student Costs

	Fixed cost	Per student cost	N/A
Math			
ELA			
Science			

3.5.2 Services Provided

For the per-student cost identified above, please identify what products or services associated with your summative high school assessment are included, answering separately for each of the following content area assessments:

	Technical documentation	Test forms	Test administration	Training	Scoring	Psychometric Services	Reporting	Other
Math								
ELA								
Science								

Additional information (optional):

3.6 Peer Review

Please identify whether your summative high school assessment is currently in use by another state for the purposes of meeting federal assessment requirements, answering separately for each of the following content area assessments:

	Yes	No	N/A
Math			
ELA			
Science			

If yes:

Please identify whether your summative high school assessment as it is currently being implemented in other states has passed federal peer review requirements:

	Yes	No	N/A
Math			
ELA			
Science			

Please identify those states where your summative high school assessment as it is currently being implemented has passed federal peer review requirements.

Additional information (optional):

3.7 Test Design Documentation

Please identify which of the test design documents for your summative high school assessment are publicly available, answering separately for each of the following content area assessments; select all that apply:

	Test specifications	Test Blueprints	Item development specifications	Representative sample of items	Data from text complexity analyses	Specifications for the various levels of cognitive demand
Math						
ELA						
Science						

Additional information (optional):

SECTION 4 – RFI PROCESS

4.1 Instructions

Your response describing the attributes listed above needs to be received by 3:00 PM on **June 8, 2017**. Please submit your packet labeled "Statewide Assessment System" in a sealed envelope to:

Ms. Lillie Gray, Director
Oregon Department of Education
Procurement Services
Public Services Building
255 Capitol Street N.E.
Salem, Oregon 97310

OR Email: lillie.gray@state.or.us

4.2 Copies

RFI respondents are required to submit one (1) original and three (3) copies of their RFI response no later than **June 8, 2017** at 3:00 PM.

4.3 Public Records

The information received shall be kept by ODEand made a part of a file or record, which shall be open to public inspection.

If Respondant believes any of its RFI response is exempt from disclosure under

Oregon Public Records Law (ORS 192.410 through 192.505), Respondant shall complete and submit the Affidavit of Trade Secret (Attachment A) and submit a fully redacted version of its information, clearly identified as the redacted version.

4.4 Clarification of Specifications

There is a single point of contact for this Request for Information. All inquires and/or questions are to be sent in writing to Ms. Lillie Gray, Director.

Any Respondant requiring clarification of the information provided, must submit specific questions or comments by 3 PM on **May 25, 2017** to:

Ms. Lillie Gray, Director
Phone: 503-947-5647
Email: Lillie.gray@state.or.us

ATTACHMENT A – AFFIDAVIT OF TRADE SECRET

_____ (Affiant), being first duly sworn under oath, and representing [insert Respondant Name] (hereafter "Respondant"), hereby deposes and swears or affirms under penalty of perjury that:

1. I am an employee of the Respondant, I have knowledge of the Request for RFI responses referenced herein, and I have full authority from the Respondant to submit this affidavit and accept the responsibilities stated herein.

2. I am aware that the Respondant has submitted a RFI response, dated on or about [insert date] (the "RFI response"), to the State of Oregon (State) in response to Request for RFI responses [insert number], for [insert brief description of the goods and/or services sought in the RFP] and I am familiar with the contents of the RFP and RFI response.

3. I have read and am familiar with the provisions of Oregon's Public Records Law, Oregon Revised Statutes ("ORS") 192.410 through 192.505, and the Uniform Trade Secrets Act as adopted by the State of Oregon, which is set forth in ORS 646.461 through ORS 646.475. I understand that the RFI response is a public record held by a public body and is subject to disclosure under the Oregon Public Records Law unless specifically exempt from disclosure under that law.

4. I have reviewed the information contained in the RFI response. The Respondant believes the information listed in Exhibit A is exempt from public disclosure (collectively, the "Exempt Information"), which is incorporated herein by this reference. It is my opinion that the Exempt Information constitutes "Trade Secrets" under either the Oregon Public Records Law or the Uniform Trade Secrets Act as adopted in Oregon because that information is either:

A. A formula, plan, pattern, process, tool, mechanism, compound, procedure, production data, or compilation of information that:

- **i.** is not patented,
- **ii.** is known only to certain individuals within the Respondant's organization and that is used in a business the Respondant conducts,
- **iii.** has actual or potential commercial value, and
- **iv.** gives its user an opportunity to obtain a business advantage over competitors who do not know or use it.

or

B. Information, including a drawing, cost data, customer list, formula, pattern, compilation, program, device, method, technique or process that:

- **i.** Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and

ii. Is the subject of efforts by the Respondant that are reasonable under the circumstances to maintain its secrecy.

5. I understand disclosure of the information referenced in Exhibit A may depend on official or judicial determinations made in accordance with the Public Records Law.

_____

Affiant's Signature

State of _____)

) ss:

County of _____)

Signed and sworn to before me on _____ (date) by _____ (Affiant's name).

_____

Notary Public for the State of _____

My Commission Expires: _____

Respondant identifies the following information as exempt from public disclosure: