July 30, 2014

Interim Deputy Superintendent Keric Ashley
District, School, and Innovation Branch
California Department of Education
1430 N Street
Sacramento, CA 95814

Dear Interim Deputy Superintendent Ashley,

Thank you for your explanation of your plans for full census field testing in Spring 2015, instead of participating in our National Center and State Collaborative (NCSC) Spring 2015 Operational Assessment. We appreciate your offer of exploring options to fund your own field test design, implementation, and analyses. We have discussed our options with our Project Officer and leadership from the Office of Special Education Programs (OSEP) since we received your letter late on Friday July 25. We had been preparing for a request to expand the scope of our cooperative agreement to permit small sample participation for a limited field test for partner states that had specific needs in Spring 2015, so this meeting with OSEP was a continuation of several months of conversations on how to do so.

The first step and foundation of that preparation has been a careful review of our capacity to add the additional scope of field testing to our No-Cost Extension year activities within our available resources, capacity, and timelines. This included consideration of the implications for project staff and technical advisor time, our vendor capacity to manage additional scope, and the timelines we must meet to ensure that our states meet their accountability reporting timelines in late summer 2015. The core deliverable of our Cooperative Agreement is to prepare states in the consortium to implement the summative assessment components of the alternate assessments in both mathematics and English language arts by the end of the contract period so that they are ready to be fully operational in the 2014-2015 school year. Any other additional scope or budget use in our No-Cost Extension year must meet the test of protecting the integrity of that core deliverable.

We have had to rethink our earlier feasibility analysis to ensure that our project resources, vendor capacity (regardless of who pays them), and timelines are secure with the proposed field test numbers going from 2,000 to 41,000 after the receipt of the California letter of intent letter July 15. We carefully considered all options available as a mechanism to fund, plan, execute, and analyze a field test of this size simultaneous to our
operational assessment, and have determined this request threatens our ability to meet the existing requirements and scope of the cooperative agreement.

Reluctantly, we have determined we cannot submit a request to OSEP to expand our cooperative agreement to permit field testing, and be able to provide the necessary assurances that our existing scope will be met within available resources, capacity, and timelines, regardless of cost share proposals from California. As co-Principal Investigators on this very large Federal project, our obligations are to ensure the core deliverables are completed in the timelines required, within budget, and are of high quality. We have determined those necessary outcomes are severely compromised by the request for full census field testing by California. No OSEP or OGC review is required on our decision since we are not requesting a change in scope for our cooperative agreement.

As noted above, we have worked with three other states on small sample field test requests with limited purpose and use, which we had earlier anticipated would easily be incorporated into our work plan. These three states are also affected by this determination. They are copied on this letter, since this immediately affects their plans for Spring 2015. Only states that plan to administer the test under operational conditions, fully implementing all features of the NCSC summative assessment design, will be able to participate in Spring 2015. We are also copying all NCSC state partners who have committed to operational testing, since this will affect the final end user costs for Spring 2015. The adjustment affects the inclusion of MD, PA, and TN on the Assessment Solution Group (ASG) lines for small sample field test paid by the project. Since California was never included on the spreadsheet calculations, the adjustment is small.

You do not have to participate in the Spring 2015 Operational Assessment to participate in the Fall 2014 Pilot 2 and be part of Pilot 2 final data review prior to operational design decisions. We welcome any partner state to register your students for our sample selection for our Pilot Phase 2 studies in Fall 2014, to ensure that your students are represented in the final design of our operational assessment, the item bank data, and our procedures. Please let us know immediately if you wish to have your students considered as we identify a scientific sample to participate in the Pilot 2 sample.

We will finalize all project design, development, and evaluation as of September 30, 2015. At that time, any state will be able to make use of these resources for all appropriate state assessment purposes. As our Cooperative Agreement states, we must “Unless otherwise protected by law or agreement as proprietary information, make any assessment products (i.e., assessments and assessment items, and information resulting from GSEG research, presentations at national and regional Conferences, publications in refereed journals, or other products disseminated to the assessment community)
developed with funds from this grant freely available to States, technology platform providers, SEA assessment program officials in non-participating states and others that request it, for purposes of administering assessments, provided they comply with consortium or State requirements for test or item security.” p. 11.

Sincerely,

Rachel Quenemoen, Project Director, Co-Principal Investigator

Martha Thurlow, Principal Investigator

cc: Ruth Ryder, Deputy Director, Office of Special Education Programs (OSEP), Office of Special Education and Rehabilitative Services (OSERS)
Susan Weigert, NCSC Project Officer, OSEP, OSERS
Bruce Yonehiro, Deputy General Counsel, Legal Division, CDE
Diane Hernandez, Director, Assessment Development and Administration Division, CDE
NCSC States that had committed to Spring 2015 administration by July 1, 2014: Arizona, Arkansas, Connecticut, Idaho, Indiana, Maine, Maryland, Montana, New Mexico, PAC 6 (Guam and CNMI), Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, U.S. Virgin Islands, Washington, DC