



July 17, 2023

U.S. Department of Education
Potomac Center Plaza
Mail Stop 2600, Room 5031-A
550 12th Street, SW
Washington, DC 20202

Good afternoon Deputy Schott,

Thank you for the opportunity to conference with you and your team this morning to discuss the Montana Office of Public Instruction (OPI) request for a double-testing waiver. We appreciated the opportunity to discuss the one-year waiver request concerning the **accountability system, reporting,** and the Montana Alternative Student Testing Pilot (MAST) through-year **assessment** model. Montana's waiver honors educators and students by removing an undue burden to double-test while piloting an assessment model that has instructional utility and produces a summative score. We are reiterating our request for the double-testing waiver approval for the 2023-2024 school year before the August school year starts.

Accountability:

Below is the data that you requested that breaks down the schools that are participating in the MAST pilot that are identified as CSI, TSI, and ATSI. The designations are based on the 2022 summative assessment results. Hyperlinks are included in the headings below for all school designations.

Schools that participate in the MAST through-course assessment pilot will maintain the federal school identification determined in the Fall of 2023 based on data collected during 2022-2023. Schools participating in the pilot will not be identified for support, or exited from support status, based on data collected during the 2023-2024 year of the pilot.

Comprehensive Support and Improvement (CSI)

2 out of 49 schools (4%) participating in the pilot are identified as CSI.

Poplar School (K-4)





Poplar 5-6

Targeted Support and Improvement (TSI)

No schools are currently identified as TSI in Montana.

Additional Targeted Support and Improvement (ATSI)

25 out of 142 schools (17.6%) participating in the pilot are identified as ATSI.

School:	Subgroup:
Arlee Elementary	White and Hispanic
Arlee 7-8	English Learner
Bigfork 7-8	Special Education
Ophir Elementary	Economically Disadvantaged, Special Education, and Hispanic
Bench School	Special Education
Big Sky Elementary	English Learner
Culbertson Junior High	White
Frazer 7-8	Economically Disadvantaged
Washington Middle	Hispanic
East Middle School	Economically Disadvantaged
Riverview School	Special Education
Sunnyside School	Special Education
Valley View School	White
West Elementary	Hispanic
Whittier School	American Indian and Hispanic
Independent School	Hispanic





Moore 6-8	White
Pine Creek School	White
Pine Creek 6-8	White
Poplar 7-8	Special Education
Mountain View	Special Education and Hispanic
Shelby 7-8	White
Thompson Falls Elem	Special Education
L A Muldown School	Hispanic
Wibaux 7-8	White

Reporting:

The OPI will continue to make publicly available chronic absenteeism data, disaggregated by subgroup, science assessment results, assessment participation rates, and progress in English Learner Proficiency. Below is a chart of the students participating in the MAST pilot. The data illustrates that the students participating in the pilot mirror the overall Montana student demographics.

Demographics of Students Participating in the MAST Compared to All Montana Students





Enrollment status for Accountability Subgroups				
Based on 2022-23 fall enrollments				
Race Ethnicity	State 3-8	State %	MAST Schools	MAST School %
Hispanic	3970	5.7%	1279	6.1%
American Indian	7150	10.3%	1450	6.9%
Asian-American	435	0.6%	142	0.7%
African-American	436	0.6%	123	0.6%
Hawaiian/Pac. Isl.	117	0.2%	27	0.1%
White	53607	77.5%	16537	79.1%
Two or more races	3416	4.9%	1337	6.4%
Total	69131		20895	0.302252246
Special Education Status	State 3-8	State %	MAST Schools	MAST School %
Not Special Education	58814	85.1%	17795	85.2%
Special Education	10317	14.9%	3100	14.8%
Grand Total	69131		20895	
English Learners	State 3-8	State %	MAST Schools	MAST School %
Current EL	2190	3.2%	442	2.1%
Not Current EL	66941	96.8%	20453	97.9%
Grand Total	69131		20895	
Economic Status	State 3-8	State %	MAST Schools	MAST School %
Economically Disadvantage	31666	45.8%	10536	50.4%
Not Economically Disadvan	37465	54.2%	10359	49.6%
Grand Total	69131		20895	

Reporting requirements for MAST pilot schools include:

- Administer and report results on all other State assessments, including science summative assessments, alternate assessments aligned with alternate academic achievement standards for





students with significant cognitive disabilities, and English language proficiency assessments for ELs.

- Report Federal accountability designations (even if same as the prior year).
- Report all other required information for all participating districts and schools, including:
 - Percentage of students assessed and not assessed.
 - Number and percentage of students with the most significant cognitive disabilities taking an alternate assessment.

The OPI assures that an operational test will be administered during the 2024-2025 school year that, following standards setting, will result in disaggregated data that can be publicly reported.

Assessment:

Over the 2023-2024 school year, OPI and New Meridian are expanding from a small-scale pilot in SY22-23 to a field test in SY23-24. This field test will include 53 school districts and over 20,000 students (about 30% of the tested population) across grades 3-8 in ELA and math. The key objectives of the expanded pilot draw from the lessons learned in the SY22-23 small-scale pilot. These objectives include:

- Continue to develop the configurator tool and help districts align the ELA and math testlets to their unique scope and sequences.
- Improve usability based on user experience data.
- Refine psychometric models.
- Continue to develop expanded reporting tools with information at the student, classroom, school, district, and state levels.
- Create additional items for grades 3-8 in preparation for an operational statewide test during the 2024-2025 school inclusive of multiple test forms.

The SY23-24 field test is needed because we are continuing to collect critical input to help refine the instructionally aligned through-year model and want to engage with teachers, students, parents, and administrators throughout the process to enrich the utility of the assessment and truly account for diverse voices that may have been traditionally left out of the assessment design process. Additionally, data from the field test will help ensure the item bank is sufficient to support a statewide administration in SY24-25. We will also use data from the field test to continue to evaluate timing data, Cognitive Diagnostic Models, and item design. Moreover, only items for grades 5 and 7 have been field tested and only items that have been field tested should be included in a statewide operational assessment.





Requiring teachers and students to continue to double-test will:

- Negatively impact innovation and send a discouraging message to educators and potentially stifle future efforts in raising the bar for student outcomes.
- Schools may abandon the pilot to preserve instructional time.
- It is not reasonable or cost-effective to change the pilot timeline at this time. There are contracts in place that outline specific actions to meet the psychometric requirements to ensure that the test items are valid and reliable.
- The design of the through-year assessment has explicit and implicit elements to measure student proficiency throughout the school year. The adjustments to the testing windows would jeopardize the flexibility of alignment of the testlets to local learning models.
- Stakeholders are seeing benefits from the pilot and providing significant support that we want to accelerate and continue to nourish throughout the transition to full-scale through-year assessment in Montana in 2024-2025.

Conclusion:

While large-scale summative tests have served the accountability system of policymakers, the people most proximate to the problem—i.e., students, families, teachers, and school leaders—consistently express legitimate concerns about existing summative assessment systems, including the tests' timing, length, and difficulty using the data for instruction improvement. As a result, we have explored all options to eliminate the added burden on students, teachers, and district leaders by preventing double-testing. The most practical and student-centered solution is the one-year double-testing waiver.

Again, Montana looks forward to receiving the approval of the double-testing waiver and continuing to work with you on the CGSA innovative pilot, in which, Montana is leading the way.

Sincerely,

Elsie Arntzen – Superintendent of Public Instruction

