



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

RICK SNYDER
GOVERNOR

SHEILA A. ALLES
INTERIM STATE SUPERINTENDENT

September 10, 2018

Honorable Betsy DeVos, Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Secretary DeVos:

The adoption of Michigan's new science standards in the fall of 2016 initiated the complete overhaul of science education in Michigan and created the need to replace past versions of Michigan's M-STEP Science assessment with a new redesigned system, aligned to our new science content standards. The Michigan Department of Education (MDE) is well underway in the development of these new tests and is conducting large-scale field-testing of these new assessments during the 2017-18 and 2018-19 school years. These new assessments will be computer-based and will involve a variety of new item types and test designs that have not been used in past science assessments in Michigan. Districts are required to participate in these two years of field-testing, and our expectation is that every student will participate. Beginning this assessment transition with large-scale field-testing will assure our new assessment is ready for operational use. This is the best plan for all our students, teachers, and schools statewide and is consistent with the successful implementation of new assessments in other states and with systems such as the Smarter Balanced Summative Assessments.

As described in Section 8401 of the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act (ESSA), the MDE is requesting a two-year waiver, which will allow Michigan to not double-test or report student test scores for the 2017-18 or 2018-19 School Years (Sys) for the administration of the full-census field test of the M-STEP science assessments. Approval of the waiver request will allow Michigan to:

- Field-test the new M-STEP science assessments, aligned to our new standards, without creating a double-testing situation for all eligible students enrolled in grades five and eight and once in high school.

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- Suspend past versions of the M-STEP science tests, which are based on outdated science standards, and provide a signal to Michigan educators to transition their daily classroom instruction from the previous science content standards to the new Michigan Science Standards.
- Temporarily suspend the required reporting of individual student scores for the 2017-18 and 2018-19 SYs for these large-scale field test years. Michigan still intends to provide student participation rates at school, district, and county levels for the field-test to the U.S. Department of Education (USED).

ESSA Section 1111(b)(1) and (2) requires a state educational agency to apply the same academic achievement standards, and to use the same academic assessments, for all public-school children in the state. Michigan requests a waiver of this requirement for science so that any eligible student enrolled in a Michigan public or charter school will be permitted to take only the field test as the science assessment. The waiver will ensure that students already receiving instruction aligned with the new Michigan Science Standards will not lose valuable instruction time in preparation for tests aligned with outdated science standards, which would yield results that lack any educational benefit for students, teachers, or parents. It will also reduce the potential stress and psychological impact of extended standardized testing on students. Allowing Michigan schools to avoid the administration of double-testing in science will provide students with the opportunity to become familiar with the new computer-based assessments in science with no undue concerns about immediate academic consequence. Students will experience the new item types and functionality that have been developed in line with our new standards and will benefit from engaging with the new items built for our new standards.

In addition to validity and fairness, the application of testing-industry standards and practices to any new assessment system through pilot and field-testing ensures the reliability of the assessments and improves the quality and meaning of their results. The sophistication and complexity of the new Michigan Science Standards requires Michigan to develop assessments that not only are aligned with Michigan's new Science Standards but also meet the requirements set forth by the American Educational Research Association, the American Psychological Association, and the National Council on Measurement in Education in the Standards for Educational and Psychological Testing (Standards). As directed in Section 3 of the Standards, all aspects of test development, including test design, validation, development, administration, and scoring, should be considered to ensure fairness in testing. In accordance with these provisions, the MDE will document all activities related to the development of the science assessments and provide all necessary documentation for a future peer review. Furthermore, Michigan's plan for M-STEP science test development will:

- Provide students, schools, and districts with the opportunity to gain exposure to the new M-STEP science assessments.

- Meet the federally-required 95 percent participation rate for the state in grades five and eight and once in high school.
- Provide high quality test items and valuable feedback on the item types and functionality for the new M-STEP science assessments.

The timeline for the implementation of redesigned M-STEP science assessment is shown below:

Year	M-STEP Development Phase
2016-17	Small Scale Pilot Test
2017-18	Statewide Field Test
2018-19	Statewide Field Test
2019-20	Operational Test

During the 2017-18 school-year, we administered a statewide field test of the new item types in small clusters of items to first expose students to the new item types. For the 2018-19 school year, our plan is to administer a statewide field-test of the entire assessment blueprint as designed for future operational use.

Michigan hereby assures that if it is granted the requested waiver:

- Michigan and its local educational agencies (LEAs) will ensure that all eligible students will participate in the M-STEP science field test.
- Michigan will properly notify all LEAs and schools of their required participation in the field tests.
- Michigan will ensure that parents and guardians of students in each school participating in the field test of M-STEP science will be notified of the school's participation in the field test by means in compliance with Sections 8401 (b)(1)(F) of the Elementary and Secondary Education Act (ESEA), as amended by ESSA.
- Michigan plans to provide training tests so all stakeholders will have access to the sample test items, as well as exposure to the complex nature of the Michigan Science Standards-aligned items, to support teaching and learning and prepare them for the new assessments, in accordance with Sections 8401 (b)(1)(C) and (F) of the ESEA, as amended by ESSA.
- Michigan will provide aggregated results from the M-STEP science field test at the state and district levels for overall and claim-level reports on the MDE Secure Site.

Honorable Betsy DeVos

Page 4

September 10, 2018

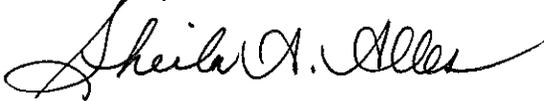
On August 9, 2018, this draft waiver request was submitted for public comment. During this public comment period, one comment was received concerning our policy to not provide additional data results while field-testing. One area of concern noted was around providing student-level data during this field test. Specifically, we feel that providing student-level data when we have not yet proven the items and assessment valid yet could lead to improper use. We have scheduled communications with the organization providing comment and are going to provide a walk-through of our science assessment plans with them.

With Michigan's move toward full implementation of the redesigned M-STEP science, the MDE hopes the U.S. Department of Education will continue to support our commitment to improve educational opportunities for all of Michigan's students by approving this waiver, which will allow a successful transition to our new science assessments.

Please direct questions regarding this request to Andrew Middlestead, Director, Office of Educational Assessment and Accountability, by phone at 517-241-2694 or by e-mail at middlesteada@michigan.gov.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Sheila A. Alles". The signature is written in a cursive style with a large, sweeping initial "S".

Sheila A. Alles
Interim State Superintendent