



May 1, 2023

The Honorable Miguel Cardona
Secretary
U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202

Dear Secretary Cardona:

We appreciate the U.S. Department of Education's (Department) commitment to high-quality assessments and their important role in the education system. State, district, and school leaders are developing innovative approaches to assessment that advance teaching and learning while providing meaningful information about student performance to students and families. Many of these innovations are happening outside of the federal landscape, resulting in dual systems that are challenging to align and manage. While progress is being made, we know there is much work to be done. State and district leaders have a strong desire to bring coherence to their assessment systems. Federal policy must promote and support state and local innovation to create more equitable and actionable assessment and accountability systems that serve all students. We are encouraged that the Department has requested information on how to improve the Innovative Assessment Demonstration Authority (IADA) to increase participation by state leaders.

Our interest in innovative assessment is to support future focused and student-centric learning systems that more deeply engage students in important deeper learning outcomes to create equitable and productive futures for all children. The items addressed in this letter, however, are largely in response to the Department's RFI, which focused mainly on comparability. In order to move toward a more innovative and balanced system, we need to think about how we weigh aspects of technical quality aligned with broader purposes of assessment systems. We do not discuss these other technical issues or our overarching goals here but welcome the opportunity to discuss them with the Department at your discretion.

We, the undersigned organizations, offer the following recommendations to ensure IADA better fosters innovation:



- **Rethink comparability.** Renowned measurement and comparability expert, Dr. Robert Brennan, noted in 2016 that “perfect comparability [between the IADA and the state assessment] would be a sign of failure.” In other words, comparability to the traditional state assessment limits innovation. The innovative assessment should be required to document that it is aligned to outcomes, in particular the depth and breadth of the state content standards. We suggest that the focus on comparability be reframed conceptually in terms of validity, that is the evidentiary basis for score interpretation and use of outcomes. Anchoring comparability to the existing test may limit the depth of thinking encouraged on the innovative assessment, because many state assessments do not measure deeper knowledge. Current IADA states face technical challenges to meet comparability requirements as they are now defined. Allowing a different, but very appropriate target (i.e., content standards) of comparability will remove this hurdle, so states do not have to restrict their innovative designs to align to traditional assessment systems. This approach to comparability still allows state leaders to use the data to inform federal accountability determinations in meaningful and appropriate ways. This more effectively supports innovation.
- **Highlight different approaches to emphasizing depth.** As part of this shift, we also encourage the Department to proactively highlight technically sound approaches to assessing the depth of knowledge expected by state standards while ensuring sufficient coverage. Moving beyond superficial coverage of many standards to focusing on standards in deliberate ways, both within and across years, will allow states to design assessments that more meaningfully measure the knowledge and skills we want our students to develop. The members of our organizations would be happy to work with the Department to provide examples of how states could approach this in non-regulatory communication to states, reflect this in an updated peer review process, and work with states on this issue as part of their planning process.
- **Allow for planning time.** We strongly encourage the Department to provide for up to two planning years and shift the current regulatory timeline back accordingly. Innovation takes time and is rarely linear. By building in explicit time to plan, the Department acknowledges that reality and better supports states to ultimately be successful. During that time, the state would signal to stakeholders the path it is on but would then have time for authentic stakeholder engagement, ensuring the state’s approach is co-created not dictated due to time constraints. The state could then refine their assessment design based on stakeholder feedback prior to administration. Another critical part of the planning time will be the interaction between the state and the Department. While the state will have a strong plan from the start, providing planning time will allow the state and Department to work together to address any potential



challenges or concerns before the state must start administering the assessment, allowing for a more effective partnership and ultimately a more successful outcome.

➤ **Remove other barriers.**

- **Clarity on scaling statewide.** There also is a need for the Department to provide clarity on what specific conditions states are required to meet when scaling IADA assessment systems “statewide.” For states that start with a subset of their local educational agencies, the transition to full statewide implementation can be challenging in the short period of time under which a state is operating under the demonstration authority. In fact, this short timeline constrains innovation because truly innovative systems (e.g., NH PACE, LA IAP) will struggle to scale statewide in such a short timeframe. We urge the Department to take an expansive view of what scaling an assessment system statewide may mean if sufficient flexibility can be adopted to grow toward statewide implementation.
- **Update peer review to reflect innovative approaches.** The Department should revise and augment peer review guidance so that it would better apply to states who are seeking to develop innovative assessments. The current peer review process does not adequately fit with new, innovative student-centered state assessments. This new guidance should uphold technical quality but give additional flexibility to allow for more space to innovate. Peer reviewers should be trained to appropriately evaluate innovative assessment designs based on the updated guidance. As part of its effort to ensure the peer review process better supports states pursuing IADA, the Department could consider how to incorporate the current IADA annual reporting requirements into an initial peer review of the new assessment system to more appropriately fit the pilot’s goals. This would reduce unnecessary burden for both states and the Department, while maintaining a commitment to ensuring the technical quality of the assessment system.
- **Remove the seven-state cap.** The Department should remove the seven-state cap which limits participation in IADA. Greater state participation is needed to help inform the next reauthorization of the Elementary and Secondary Education Act. Without a variety of assessment approaches and a robust research agenda, the nation will lack clarity on the best path forward for K-12 assessment systems. Without a cap, the Department could also reconsider the process for states to apply. Rather than relying on a specific, limited time frame during which a state can apply, the Department could consider accepting applications on a rolling basis so states could apply when ready,



meeting states on their timelines and alleviating unnecessary constraints on states that want to pursue innovation.

- **Integrate the opportunity for innovation in accountability as part of the pilot.** Given the integrated nature of state assessment and accountability systems, the Department should consider enabling states to design coherent solutions that address both assessment and accountability as part of IADA. This approach would allow states to think coherently about their entire system from the start; in a way that would better prepare them to both complete the pilot and sustain their innovative approaches. Chris Domaleski recently laid out an argument for an [accountability pilot](#) as an essential companion to the innovative assessment pilot. We argue that the current accountability system is a serious constraint on the nature of assessment innovation and requires related flexibility. While working on such a pilot, federal funding could also be used to establish a research project to understand the unintended consequences of the current accountability approach and learn about other approaches. Again, members of the undersigned organizations stand ready to support the Department in designing a more coherent pilot.
- **Create a process of partnership.** Underscoring all these recommendations is a desire to make the IADA process inviting to state leaders. While we know that the Department wants states participating in IADA to be successful, state leaders may perceive that the process for applying and complying with the regulations as they are currently conceived is too burdensome given all the other priorities state leaders must balance. We strongly encourage the Department to continue to signal your openness to innovation and to work with state leaders who may be interested in applying for IADA to ensure the process is efficient and built on a true sense of partnership between the state and the Department. Building on the idea of allowing time for planning, the Department could create some form of onramp to IADA through a grant or process that allows states to begin the planning process without having to officially submit for IADA from the start. The Department could also create opportunities for IADA states to convene to form a support network to share ideas and strategies.
- **Provide funding for IADA.** While these recommendations will help address some of the concerns about IADA, we believe they should be part of a coherent strategy by the Department to support assessment and accountability innovation. We appreciated the increase in funding for state assessments included in President Biden's FY24 budget request. We have also advocated for an increase in funding for the Competitive Grants for State Assessments (CGSA) to provide necessary resources to states pursuing innovative approaches. Thinking holistically



about both the flexibility and the resources that the Department can provide can further encourage state leaders to apply for CGSA, which may lead them to then apply for IADA. The Department could signal, as it did in 2020, that states can use CGSA funding to effectively start to work and plan for what could ultimately be a pilot pursuant to IADA. Hawaii, for example, started with CGSA to take the time and resources to plan for what they may ultimately submit for IADA. While we would not recommend making the link between CGSA and IADA a requirement, we do think highlighting the ways in which they can work together would be helpful for state leaders. CGSA funding could also be used to support states considering redesign of accountability systems to better align with new assessments. Whether through CGSA or otherwise, IADA and related flexibility must be funded.

To truly move to an education system grounded in student-centered learning that allows for deeper levels of student engagement and learning, we know that broader statutory and systemic changes are needed. The nation is poised to take on new ways of assessing student learning that better measure the critical skills and knowledge we want to develop in students. State, district, and local leaders are eager to try new approaches that better meet the needs of students, educators, parents, and communities. We know your openness to improving IADA is one step in that direction, and we appreciate the Department's interest in fulfilling the promise of IADA flexibility in a way that truly fosters innovation. We stand ready to partner with you as you move this process forward.

Sincerely,

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