

May 1, 2023

Patrick Rooney

Office of Elementary and Secondary Education

U.S. Department of Education

400 Maryland Avenue, S.W., Room 3W202

Washington, D.C. 20202

Dear Mr. Rooney:

Below is The Education Trust's response to the Department of Education's (ED) Request for Information on the Innovative Assessment Demonstration Authority (IADA). The Education Trust believes that **addressing inequities in educational outcomes — particularly for students of color and students from low-income backgrounds — cannot happen without the valid, reliable, and comparable data that come from statewide summative assessments.** State assessment results help schools and district leaders target state and local resources to the students and schools with the greatest need and track whether these resources are impacting student achievement.

However, our [recent research](#) finds that students, families, and educators don't believe that current assessments are living up to their promise of aiding in addressing educational inequities. Based on this research, we believe that **assessments must be reformed to ensure they are culturally relevant and that results are communicated to parents and schools in ways that allow them to be more actionable.** IADA represents one important avenue for states to engage in innovation required to address these crucial issues in current statewide assessments. Yet as your RFI points out, many states have been reluctant to pursue innovations via IADA due to real or perceived burdens to participation.

The Department should consider the following as you work to revise guidance and requirements for participation in IADA:

1. Clarify how the Department defines comparability and allow additional ways for states to demonstrate comparability.
2. Incorporate a new planning period to allow states to develop plans for new assessments ahead of scaling efforts.
3. Provide funding for IADA participants and/or braid program with existing funding for assessment innovation.
4. Update guidance to more clearly communicate requirements and options available for states via IADA.

**Clarify how the Department defines comparability and allow additional ways for states to demonstrate comparability.**

While the comparability of scores between students, student groups, schools, and districts must be maintained, encouraging more innovation may require flexibility when considering the comparability of new and old assessments. While the statute says that states participating in IADA must "generate results

that are valid and reliable, and comparable, for all students and for each subgroup of students described in section 1111(b)(2)(B)(xi), as compared to the results for such students on the State assessments under section 1111(b)(2),” we don’t believe the intent is to require states to produce results via innovative assessments that are the same as current assessments. Such an interpretation seems counter to the goal of developing assessments that better assess students’ knowledge and skills.

This is particularly true as we think about developing assessments that test students on higher-order and critical-thinking skills or incorporate racially and culturally inclusive content, as these changes may result in significant differences in scores, but in a way that could more accurately measure what students know and can do.

For instance, if an innovative assessment is being designed to be more closely aligned with high-quality, standards-aligned curriculum to limit the impact of background knowledge, it may be expected—or even preferred—for results from this innovative assessment to tell a different story about student achievement.

Given this, we would encourage the Department to explore how to allow states to continue maintaining federal accountability systems, while providing states with flexibility to use more logical ways of demonstrating comparability of results—if differences in results are aligned with the intended goals for innovation and the innovative assessment addresses grade-level standard content and skills. Even within this flexibility, continuing to require states to monitor and publicly report on the comparability of the results between new and old assessments is critical for ensuring students are being held to high standards on new assessments.

This is particularly important given how states are actively pursuing assessment innovation outside of the confines of IADA. Montana, which is pursuing important assessment innovations using funds via Competitive Grants for State Assessments (CGSA) program, has recently applied for a [field test waiver](#) which would exclude all participating schools from statewide accountability systems during a single year of field testing.

While this could be a promising alternative to IADA for quickly scaling innovative assessments, it is currently unclear whether Montana or other states that could consider a similar option will be able to generate the necessary data to demonstrate the quality of their assessments in a single year. The potential need to extend such a waiver would severely limit states’ ability to report on school performance and identify schools in need of support, as required via the Every Student Succeeds Act (ESSA). IADA provides an avenue for states to take the necessary time to scale their assessments while still fully participating in federal accountability. Therefore, considering how to allow additional ways for states to demonstrate comparability between legacy and innovative assessments could encourage states to participate in IADA as opposed to pursuing alternatives, such as field test waivers.

**Incorporate a new planning period to allow states to develop plans for new assessments ahead of scaling efforts.**

Currently, the timeline for IADA is focused on states scaling innovative assessments over the course of 5 years (or up to 7 with approved extensions). Yet much of the work required for states to develop innovative assessment systems must occur before field testing and scaling assessments across schools and districts occur. Allowing states to express interest in assessment innovation via a pre-approval

process with the Department that leads to a planning period could lower the perceived barriers to IADA participation for states and provide states with useful federal guidance and feedback as they explore potential new assessment options.

However, while it is important to give states ample time to develop their assessments systems, the Department should incorporate the planning period into the existing 5-7 year timeline, rather than adding it as an extension. Doing so will avoid states administering two different assessments for an extended period of time—which could limit states’ ability to clearly communicate student academic achievement to educators and families or accurately identify schools for improvement and additional supports, similar to an extended field waiver, as mentioned above.

As requested by the Department, the following are some of the key activities that states need to engage in ahead of applying for and participating in the current IADA program. These activities require substantial capacity that must occur while state and district administrators continue to administer current statewide assessments:

- Engage students, families, and educators on their needs for assessments and how innovations in assessments can address these needs
- Engage assessment experts
- Develop a vision of assessments, including creating a theory of action, discussing implications for assessment design, and exploring various trade-offs
- Secure funding to support assessment innovations—including state funding and/or CGSA funding
- Write an RFP, vet and select assessment vendor(s)
- Plan for professional development and capacity building for educators and school and district leaders to support educators to contribute the development of assessment items and administer new assessments

**Provide funding for IADA participants and/or braid program with existing funding for assessment innovation.**

Many states currently do not have the capacity to engage in activities listed above while also maintaining current assessment systems. Despite this, IADA currently does not provide states with any funding connected with participation. This is a large barrier preventing states from applying for IADA. While the Department cannot independently provide funding for IADA, the Department should consider encouraging states to jointly apply for CGSA funds and participation in IADA, especially via the suggested added planning period. Additionally, the Department should work with Congress to allocate funds to IADA to encourage states to participate.

As noted above, the wide range of activities states must engage in ahead of developing even a single test item—a process that can take multiple years—are vast and require substantial funding and capacity. Providing stand-alone funding or pairing IADA with established funding streams would allow states to hire additional staff and build the internal capacity needed to plan for, develop and scale innovative assessment systems that will better meet the needs of students, families, educators, and educational leaders.

**Issue guidance to more clearly communicate requirements and options available for states via IADA.**

Current regulations for IADA were published in 2016, and therefore do not reflect any learnings from the Department's engagement with states innovative assessments and changes in the assessment field over the past several years. Developments in assessment practices, including advancements in technology, and the Department's internal knowledge via state engagement should be incorporated into new guidance that provides states with clear information about the types of assessments that would qualify for IADA, including specific examples. Any guidance or updated regulations should also include any changes to comparability guidelines informed by responses to this RFI. Such guidance should be clearly communicated to states well in advance of future opportunities for states to apply for IADA.

Thank you for the opportunity to provide feedback on this program. Please do not hesitate to follow up with Nicholas Munyan-Penney for any additional information at [nmunyanpenney@edtrust.org](mailto:nmunyanpenney@edtrust.org).

Sincerely,

The Education Trust