

# CLEARING THE PATH FOR ASSESSMENT INNOVATION

## THE ROLE OF FEDERAL POLICY



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These don't have to be just imaginings. Learning shifts like these are taking hold in schools across the nation as more and more education leaders work to create opportunities for student-centered learning.

Realizing the full potential of student-centered learning requires transformation of traditional approaches to assessment and accountability. While local communities, districts and states lead the push for modernization, federal policies are lagging. Low levels of state participation in federal initiatives designed to support innovative assessment, through both grant opportunities and pilot programs, suggest that it is time for policymakers to take a fresh look at these initiatives and take steps – both near- and longer-term – to better leverage federal support for states' design and use of innovative, student-centered assessments.

To create more equitable assessment and accountability systems that empower and encourage the adoption of new teaching and learning models aligned to student-centered learning, we must shift course and provide a realistic pathway for state and local innovation. Without a clear pathway, educators and communities will lose faith in our systems and millions of federal dollars intended to support assessment innovation will not bear fruit. Now is the time to create the running room states and districts need to try new approaches and demonstrate impact. We can learn what's truly possible and what policies enable it so legislators can make fully informed decisions when the time comes to revise the policies codified in federal law. The status quo is failing kids; federal policy must evolve to allow schools to give them what they deserve.

In this paper, we highlight some of the innovative work states are pursuing using current federally created opportunities and identify the barriers that hobble their plans to scale and sustain their work. We aim to share the promise of states' innovative assessment visions as well as the obstacles they are encountering in bringing those visions to life. Finally, we provide recommendations for how policymakers can build on the groundwork states are laying to foster innovation and opportunity in assessment across the nation.

## CONFLICTING PARADIGMS

State, district and school leaders are developing innovative approaches to assessment that advance teaching and learning while providing timely, meaningful information about student performance to teachers, students and families. They are reflecting on the ways assessment both informs and drives instruction and exploring different ways to better align curriculum, instruction and assessment. Many are striving for a balanced assessment system that includes a mix of interim, formative and summative tests that emphasize deeper learning to gauge student progress toward—and mastery of—key skills, an inherent component of an effective student-centered learning environment.<sup>1</sup> In a balanced system, each assessment is designed to shed light on learning in distinct ways, and together, they form an efficient system that can support learning at the classroom, school, district and state levels.

Current federal policies, however, build on the theory of change introduced in 2001 under the No Child Left Behind Act: When the results of high-stakes tests are public and the most prominent feature of a school grading system, schools will be motivated to improve with the support of their states. As a result, federal law emphasizes a heavy focus on summative assessments that carry high-stakes consequences for schools, and in some cases students. In addition to this focus on school-level accountability, the law also requires the same tests to provide diagnostic information about student learning. By requiring the assessments to inform high-level school accountability while also providing individual student diagnostic reports, the tests often become cumbersome and their potential efficiency and effectiveness in fulfilling either purpose is undermined.

These federally required summative assessments drive the allocation of resources, financial and otherwise, such that behaviors in schools are often misaligned with student-centered classroom practice. Given the high-stakes use of summative assessments, teachers can feel compelled to spend significant time in the classroom both preparing for and administering end-of-year tests. This test preparation fails to drive deeper learning and inform the critical thinking skills we want students to demonstrate.

Federal policies therefore can seem at odds with state efforts to design and use assessments that serve other purposes, particularly as state leaders are increasingly considering how to more appropriately balance assessment for accountability with assessment for teaching and learning. Both are critically important, but one assessment does not have to accomplish both goals. While the challenges are significant, education leaders remain committed to charting a better path forward.

## CURRENT FEDERAL ASSESSMENT OPPORTUNITIES

In recent years, federal policymakers have taken incremental steps to support state and local innovation. The U.S. Department of Education (USED) and Congress have intentionally tried to create some space and support for state efforts, including through:<sup>2</sup>

- » **USED's Competitive Grants for State Assessments (CGSA) program**
- » **USED's Innovative Assessment Demonstration Authority (IADA)**
- » **Flexibility within the Elementary and Secondary Education Act, known since 2015 as the Every Student Succeeds Act (ESSA)**
- » **USED's authority to waive some statutory provisions and related regulations**

The idea behind these opportunities was to create paths for more innovative approaches, while maintaining a clear set of guidelines. While they have opened the door to innovative assessment,

they have not significantly changed the national assessment landscape. The four existing opportunities are not well aligned, and each faces its own set of limitations.

The CGSA program was designed to support states in enhancing the quality of assessment instruments and systems. Within a set of allowable uses of funds (please see Appendix), states may try new approaches. For some, the assessments are part of a comprehensive system and, as they are not designed to be used in a statewide accountability system, will not require federal approval. For others, the innovative approaches intend to serve as federally required assessments, with federal peer review and approval processes. CGSA provides critical financial resources for states pursuing assessment improvements. It does not, however, have a consistent focus on innovation, nor a clear path for states seeking to scale and sustain their work.

**For now, we straddle the space between federal policies primarily aligned to traditional approaches to summative assessment and an urgent need for new policies that promote coherent systems of assessment.**

States pursuing IADA have their own challenges. Policymakers initially created the program in hopes it would lead to a variety of innovations that they could study to inform the next reauthorization of ESSA. As states have pursued IADA, however, the requirements of the program have often overwhelmed the innovation. There is no funding and states must continue to use the system for which they have received federal approval while simultaneously designing, administering and reporting on one or more new, innovative assessments. As a result, the program has never reached its initial statutory participation, and very few states are taking their innovative assessment statewide. In response to public feedback, USED recently released a letter to Chief State School Officers<sup>3</sup> outlining improvements they are seeing to make to IADA, many of which are aligned to recommendations discussed throughout this resource (the “November IADA Letter”). The clarifications attempt to address real or perceived barriers states may be facing and foster increased participation in IADA. While it is too soon to determine the impact of the letter, it is an important signal of USED’s willingness to support and partner with states interested in pursuing innovative approaches through IADA.

In ESSA there are some exceptions to assessment requirements. States have leveraged flexibility for things like the use of nationally recognized assessments in high school. While there is flexibility for specific elements of an assessment system, there is not a path for a comprehensive redesign.

Finally, USED’s waiver authority has not created a clear path for pursuing assessment innovation. USED has used its waiver authority on different occasions in the past, including when many states were transitioning to Common Core-aligned assessments, and assessment-related waiver requests for exemptions from annual assessment requirements during the COVID-19 pandemic. Most recently, it approved a request from Montana’s Office of Public Instruction for a one-year waiver as they transition to a through-year assessment. USED has not, however, more explicitly signaled how this authority could support states who have developed new assessments pursuant to CGSA or IADA, for example, making it an uncertain pathway for state innovation.

Congress appears to have no plan to reauthorize ESSA in the short term, but state leaders and others must be ready to advocate for needed change. For now, we straddle the space between federal policies aligned to traditional approaches to summative assessment and an urgent need for new policies that promote coherent systems. These new systems must honor the intended use of different types of assessments while taking advantage of new technologies and ways of understanding effective assessment practice. It is within that context that this paper seeks to elevate promising developments and opportunities for change.

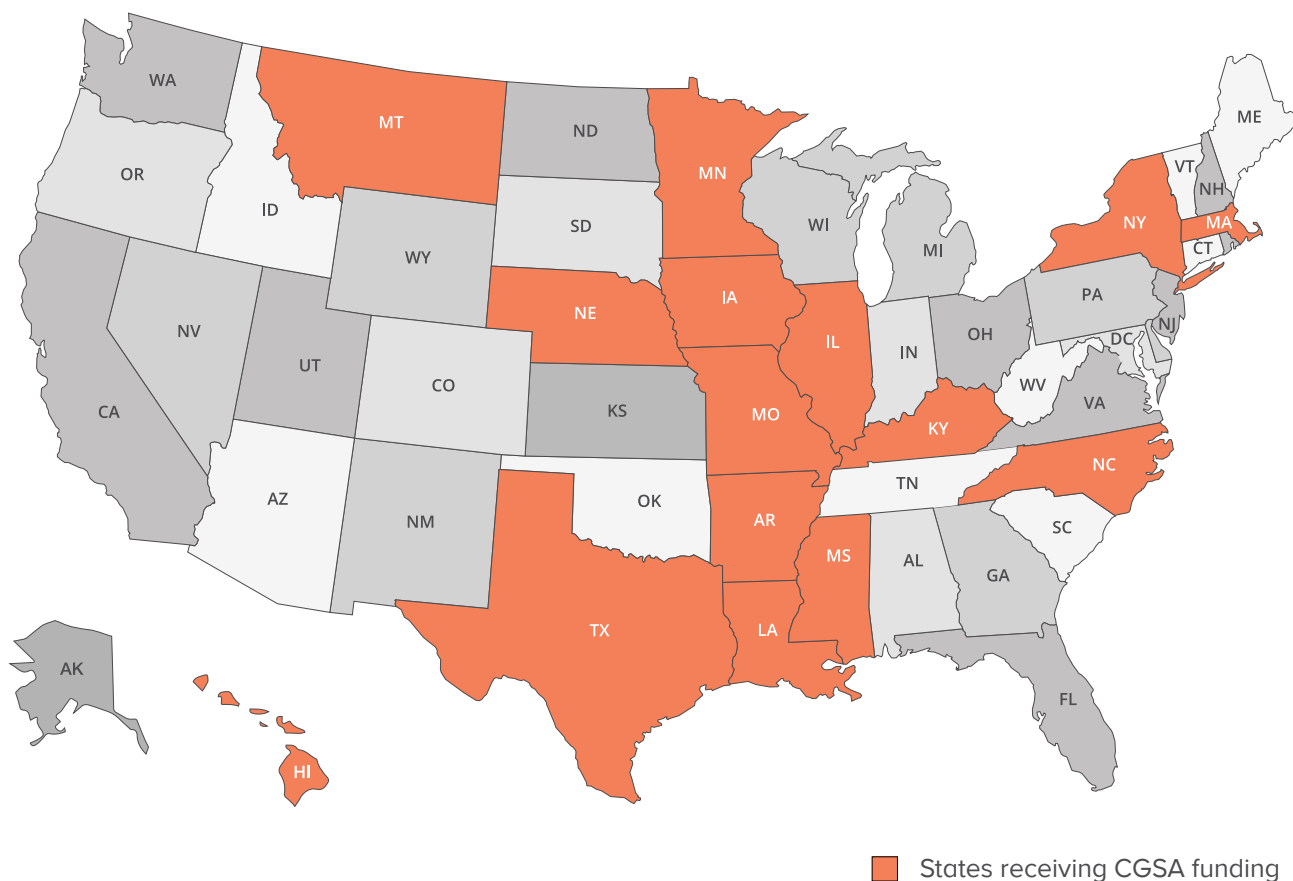
## PURSUING ASSESSMENT INNOVATION: THEMES FROM THE STATES

The current federal context presents significant barriers, but state leaders have started seeding changes to assessment systems, primarily pursuant to CGSA and IADA. The opportunity for state leaders to advance assessment instruments and systems with federal funding has had a particularly positive impact.<sup>4</sup> While the work varies, there are several themes that emerge from their efforts that have the potential to collectively impact the assessment field.<sup>5</sup>

- » **Funding provided by CGSA has been critical for states.** Assessment development is expensive, particularly when states are still operating their current assessment systems. Federal funding provides needed resources to incentivize and support states in exploring new, better approaches to assessment.
- » **States are working to leverage assessments to improve instruction.** State leaders are examining what it looks like to better measure the deep knowledge and skills we want students to develop. The goal is that better assessments will have a positive impact on instruction, moving away from skills-based test prep to encourage and support educators to engage in similarly in-depth practices in the classroom.
- » **States are deliberately addressing assessment with related professional learning.** For a comprehensive assessment system to have its intended impact, educators must receive the support they need to understand the assessment system and use data in appropriate ways—including, where appropriate, to inform instruction. States consistently note the critical role of supporting educators through professional learning to ensure they are part of the process for developing, implementing and using new assessments.
- » **States have a heightened focus on culturally responsive/relevant assessments to improve measurement of students' achievement.** Multiple states expressly address the importance of developing assessments that are culturally responsive/relevant to ensure they are eliminating bias and providing opportunities for students to bring their cultures into the assessment experience.
- » **Authentic community engagement, and even co-creation, are essential to success.** To develop and deliver assessments in meaningful ways, community engagement is critical. State leaders describe ways in which they are working with not only local educators but with local communities as part of the development process.
- » **CGSA has been effective at supporting assessments for special populations.** CGSA explicitly calls for funding to be used to develop or improve assessments for English language learners and students with disabilities. This funding is essential for developing assessments for these populations and has supported significant advancements to ensure we understand how all students are progressing and how best to support them.

## Competitive Grants for State Assessments: Impact Across the Country

This paper provides a deep dive on three of the 15 states across the country that received CGSA funding over the last four years, and some of those states are part of a consortium reaching even more states.



In addition, some CGSA recipient states are taking advantage of the other federal opportunities noted above—IADA, statutory flexibility and the Secretary’s waiver authority. Here are just two examples of new assessment strategies other states are pursuing:

**KENTUCKY:** State leaders in Kentucky are working closely with communities to co-create new systems of assessment and accountability that drive the state toward a statewide competency-based education model. The state’s “system of systems” is intended to both better meet unique local needs, while aligning with federal requirements. Kentucky is one of the few states to explicitly address assessment and accountability together as part of its CGSA funded work.

**ILLINOIS:** State leaders in Illinois are creating through-course assessments of reading and writing in Spanish for students in grades nine and 10. The goal of these assessments is to fill a gap in the state’s current system of achievement tests for grades three to eight and 11, and support educators in tailoring instruction and supports that can reduce drop-out rates and help more Spanish-language-dominant students graduate.

## STATE STORIES: THREE STATE DEEP-DIVES

While great work is happening across the nation, this paper takes a deeper look at three states using CGSA funding, two of which are also pursuing IADA, to advance innovations in assessment to illuminate the ways in which state leaders are pursuing creative approaches to improve traditional systems.

State snapshot:

# Hawai'i



**PROBLEM TO SOLVE:** How can the state leverage new assessment approaches that will inspire teachers and students to engage in deeper teaching and learning practices?

**INITIAL SUCCESS:** The state has worked with educators to develop performance assessments and related instructional guides. They have had a deep focus on ensuring performance items are learner-centered.

**KEY CHALLENGES:** Providing enough time and space for educators to engage in the performance assessment development process. The process for scaling takes time and resources.

The Hawai'i Department of Education's (HIDOE) application set forth a vision for creating a comprehensive assessment program, a core component of which is the development of high-quality, classroom-embedded and learner-centered performance assessments. While significant progress had been made over the past 10 years to raise overall achievement in Hawai'i, achievement gaps were not closing. HIDOE noted that there are limitations to how authentic and inclusive the current annual statewide standardized testing can be for students. The goal of the comprehensive system is to more seamlessly integrate classroom curriculum, instruction and assessment to facilitate more authentic learning environments, which in turn would inspire teachers and students to engage in deeper teaching and learning practices. While recognizing the need for summative assessment for federal accountability purposes, the comprehensive system would decrease emphasis on the statewide summative assessment and increase focus on classroom-embedded assessments, creating a more balanced system that aligns different assessments to meet different purposes yet works coherently as a whole.

The theory is that if teachers are provided high-quality, standards-aligned curriculum, instructional and assessment materials and given rich professional development with other supports and resources they need to effectively instruct on the standards, then teachers and students can use information from the multiple measures represented in the classroom-based assessment system and state assessment system to improve practice and student learning.<sup>6</sup>

In January 2020, HIDOE applied for IADA and included two components in the application: (1) shorten its summative assessment, while ensuring it is still technically sound for purposes of federal accountability, and (2) work with teachers to create a classroom-based assessment system. The theory was that by looking at the assessment system comprehensively, HIDOE could meet the requirements of ESSA, both providing a summative assessment for federal accountability and providing instructionally relevant information to educators, students and family members. USED, however, pushed back against the proposal to shorten the summative assessment, taking a traditional perspective that the summative assessment itself had to fulfill all elements of the federal law, rather than considering the role of the comprehensive system in its entirety to fulfill those requirements. Their IADA application was denied.



The state pivoted and in September 2020 applied for, and was awarded, the first of two CGSAs. The focus of the CGSA-funded work was on the classroom assessment component of the system, with an emphasis on working with educators to develop performance assessments, a project that came to be known as the Performance Assessment Development Initiative (PADI). Through the initial CGSA funding, the state has worked with educators in year-long development, review and implementation cycles to develop English language arts (ELA) and math performance tasks. A second cohort of PADI teachers began work in 2022-23 after the state was awarded a second round of CGSA. To continue to develop HIDOE and educator capacity, the state focused on three things:

- » **Build upon PADI to support educators to continue developing performance assessments and train educators to use them**
- » **Build educator and HIDOE capacity to create instructional guides and activities, giving educators the tools they need to evaluate assessments and augment/supplement them as needed**
- » **Explore creating skills profiles based on classroom-based assessments and/or interims that would be used as claim-level reports on annual state testing individual reports**
- » **In its 2022 CGSA application, HIDOE anticipated approximately 240-280 teacher participants, and 5,600 students over the 48-month proposed project. The participants are geographically and demographically representative of Hawai'i public schools and the ethnic diversity of students in its public schools**

Through engagement with educators and students as part of this process, the state's approach to developing more learner centered performance assessments evolved significantly. From the start, the state had cultural responsiveness as a goal, but as the project progressed, they pushed themselves to truly reflect on what it meant to design culturally responsive performance assessments in a meaningful way. HIDOE engaged in multiple learning sessions with partners to delve into "culture" and what that means for students, teachers and communities, realizing that culture is a concept which is constantly evolving and can encapsulate different ideas to different students. This understanding led HIDOE to adopt "learner-centered," a broader, more inclusive term. Building on this work, they developed design principles to help keep cultural responsiveness central to their design process.

Significant progress has been made to date, with educators embracing the work with HIDOE. The state is continuing to develop performance assessments, expanding to include assessments for science and potentially adding social studies. Content leads—teachers who apply to be teacher leaders within the performance assessment development process and help support design teams—have played a critical role in PADI's success. HIDOE is seeking to make PADI a course that counts toward professional development for educators with the hope of increasing training opportunities. They are also working with teachers to pilot their instructional guides and provide feedback. With time, more and more educators across Hawai'i will be using these resources to support deeper-learning instructional practices. Funding from CGSA has been instrumental in jump-starting this work, and the state is already working on plans to effectively sustain this work when the grant period ends.

Moving forward, the state hopes to continue to build on this work, continue to develop and support educators to use learner-centered, classroom embedded performance assessments and create a pathway for ensuring assessment plays an appropriate role in classroom practice. For now, the performance assessments are not being used for federal purposes, giving the state more flexibility on their design and use. The state continues to have a strong vision for what a comprehensive system of assessments could look like that maintains accountability for all students while providing useful and relevant information to educators.

## State snapshot:

# Louisiana



**PROBLEM TO SOLVE:** How can the state create a stronger tie between the state assessment and the experience each student has in the classroom?

**INITIAL SUCCESS:** The state has piloted two curriculum-embedded through-year assessments for ELA, each of which is connected to a different curriculum. Educators have been very positive about the shift to creating a stronger link between the assessment and classroom learning.

**KEY CHALLENGES:** Determining how many curriculum-aligned assessments the state has the resources to develop given the cost and time needed for each new assessment. The state will also need to successfully pass USED's assessment peer review if it scales statewide.

Louisiana's theory of change in pursuing an innovative assessment approach is that deliberately tying assessment to what students experience in the classroom is a better measure of students' achievement. Teachers will move away from more skills-based assessment preparation and engage in much deeper instruction when the assessment and classroom experience are directly linked. Through this shift, the state aimed to reduce performance gaps between student groups and increase student engagement as compared to traditional summative assessments.

The theory is that when there is agreement on the texts and knowledge in advance, not only will teachers lead students in much deeper instruction—using the standards to help students explore knowledge and text rather than practicing skills in isolation—but also that the assessments will become a fairer and truer measure of a student's ability.<sup>7</sup>

The desire for change grew first out of the state's concerns about their students' overall performance on measures such as NAEP and their significant achievement gaps. The state also heard concerns from stakeholders when they were developing their ESSA plans. Educators were eager for ways to reduce and streamline testing time, asking for more coherence across what felt like a system of discrete, time-consuming assessments. These and other considerations led to the design of several assessment formats that “measure student understanding of pre-identified knowledge and texts, drawing on students' deep knowledge of content and books from their daily classroom experiences—rather than a random assortment of texts, as are typically used on large-scale assessments.”<sup>8</sup>

To advance this work, Louisiana pursued multiple federal opportunities, including a CGSA in both 2020 and 2022, as well as IADA in 2018. In its 2022 CGSA application, the state described that the goal of the project was “to develop a comprehensive, ‘curriculum-relevant’ through-year assessment system that better balances assessment of learning with assessment for learning; building a cohesive, competency-based education model which aligns standards, curriculum, instruction and assessment.” To date, the state has piloted two curriculum-embedded through-year assessments for ELA, each of which is connected to a different curriculum. The state is also developing a through-year math assessment for elementary grades. This partnership acknowledges the range of curricular choices made in Louisiana for teaching mathematics compared to ELA. Through this model, school systems will identify the appropriate units for each of the short end of unit assessments (testlets) that align with the material taught. Teachers will receive feedback on student performance, allowing for additional student support and learning acceleration.

Initial results from the pilot were positive. For example:

- » Results indicate that compared to the traditional summative ELA assessment, students stay more engaged<sup>9</sup>
- » The achievement gap in summative scores between students living in poverty and their peers was reduced by a third<sup>10</sup>
- » Educator feedback was positive – in one survey, 83% of 159 educators participating in the pilot responded that “state ELA assessments [should] be tied to [what’s taught in the classroom]”<sup>11</sup>

While initial momentum has been positive, the state is now wrestling with the path for sustaining and scaling this approach. Balancing the desire for curriculum-related assessments with local decisions about curriculum has presented questions about how best to scale statewide. As the state noted in its 2022 CGSA application, “Developing a suite of through-year assessments embedded in each of Louisiana’s high-quality curricular options in ELA and math would be prohibitively expensive, not to mention the variety of logistical challenges it would entail (e.g., administration).”<sup>12</sup> Louisiana’s continued commitment to providing in-year opportunities for high-quality student assessment and feedback to teachers and parents on their student’s performance is evident in their most recent CGSA applications, which seek to break down the false choice between statewide-aligned assessments and local curricular choice.

Ultimately, if the state does end up using this new model for federal accountability purposes, the assessment system will need to undergo federal peer review. Doing so may encourage a new way of thinking about issues such as comparability. This innovative approach to assessment has already created a model for other states to explore, and pushed our collective thinking about what we measure and how we measure it.

State snapshot:



## Massachusetts

**PROBLEM TO SOLVE:** How can the state develop an assessment that better inspires instruction focused on deeper learning?

**INITIAL SUCCESS:** The state has successfully piloted a science assessment consisting of performance task simulations with a range of question types, built around a storyline and narrative intended to help students understand the relevance of the science problems they were trying to solve. They have simultaneously been providing professional development to teachers on science and deeper learning practices.

**KEY CHALLENGES:** Developing a new innovative assessment while simultaneously maintaining development on the existing test requires substantial funding, more than CGSA supports. The state will also need to successfully pass USED's assessment peer review if it scales statewide.

In the early 1990s, Massachusetts led the nation in developing high-quality standards and the Massachusetts Comprehensive Assessment System (MCAS). While this spurred improvement and students in Massachusetts continue to lead on many educational measures, including the National Assessment of Education Progress (NAEP), scores on the NAEP have been stagnant for years, and gone down in some cases. The state also consistently has large achievement gaps for students of color, English learners and students with disabilities. While Massachusetts had seen tremendous progress since the introduction of MCAS and standards-based instruction, there were also signs that further progress would require innovation. In some schools, teachers reported that they spent excessive time on test-prep activities due to perceived pressure to improve performance on MCAS.

Massachusetts determined it was again time to explore innovative approaches to assessment. The state wanted an assessment that inspired high-quality instruction and focused on deeper learning. If the assessment asked students to take engaging, comprehensive, technology-enhanced performance tasks, teachers would in turn prepare students by engaging them in learning in different ways. As the state noted in its IADA application, "Our objective is to show educators, schools and districts examples of tasks that assess mastery of standards while utilizing 21st-century skills in an authentic context, as a means to encourage the use of similarly deep and authentic tasks in classroom instruction."<sup>13</sup>

We have multiple goals for this assessment: to serve as a model of deeper learning tasks and illustrate the desired shift in classroom instruction; to measure more of what matters, potentially including mastery of science practices or 21st-century skills; to be more engaging and relevant for students; to create more equitable opportunities for all students to demonstrate what they know and are able to do.<sup>14</sup>

Like Louisiana, the Massachusetts Department of Elementary and Secondary Education (DESE) saw CGSA as a way to fund their innovative assessment development. The state notes in the CGSA application, "The IADA proposal outlines a five-year plan to create the innovative assessment and bring it to statewide scale. This grant will significantly aid us in bringing the plan to fruition, allowing us to dedicate the needed level of resources to both the development of the assessment and support for schools and teachers."<sup>15</sup> To advance its theory of change, DESE pursued two related efforts:

- » Developing an innovative science test that uses computer-simulated, authentic performance tasks to measure students' mastery of science knowledge and practices
- » Providing professional development and support to participating schools on practices for deeper learning

The state was deliberate about engaging educators, students, families and other community members in this effort. Starting in 2018, Commissioner Riley did an extensive listening tour that helped shape DESE's vision for deeper learning. As the state began to develop the new assessment to promote deeper learning, teachers and students were instrumental in the development and review process. The state conducted empathy interviews with families and students, engaged with advisory groups representing a range of groups and created teacher committees to support the development of tasks.<sup>16</sup>

The state has completed three years of successful pilots of the new science assessment, which consists of performance task simulations with a range of question types, built around a storyline and narrative intended to help students understand the relevance of the science problems they were trying to solve.

The assessment has now been piloted with over 12,000 students in each of grades five and eight. Initial results from the pilot are positive. Student scores on the performance tasks are well distributed over the full range of score points, and survey results show that most students had a positive experience with the test and can show their science skills and knowledge (though 8th graders were more likely to say they preferred the existing test). The team has also analyzed results to verify that the new test does not introduce new achievement gaps, and analysis of pilot results so far shows that Black and Hispanic students have slightly better relative performance on the new test compared to MCAS.

In parallel, DESE is working to build educator capacity on deeper learning, high-quality science instruction and assessment literacy. Building on work already underway as part of the state's Kaleidoscope Collective for Learning, the state is providing professional development in conjunction with the transition to the new assessment. Part of that is supporting educators in using DESE-created tasks that are similar to the assessment, with the intention of helping to deepen students' learning in the classroom and build teacher's capacity to use performance tasks as a formative assessment.

As the state looks to scale this work, cost and pace of content design may present challenges. The state is deeply committed to quality, and to releasing examples of the performance tasks to the field. However, the tasks are more expensive to develop than individual items on the MCAS for a few reasons: The simulations are expensive and time consuming to develop; the connected items on a task must be reviewed carefully to avoid interdependencies and cluing; and fully meeting accessibility requirements is more complicated due to the visual nature of the tasks. Additionally, a new test has many program startup costs to develop and study equating models, alignment claims and more that are already established on existing programs.

The state intends to eventually use this assessment as a replacement for its current science assessment, which means it will have to undergo federal peer review. Massachusetts takes a thoughtful approach to the issue of standards coverage, approaching the concept of depth and breadth of standards by creating an assessment design that deliberately allows for students to go more deeply on certain standards, while ensuring adequate coverage over time. This focus on depth over breadth is at the core of the shift the state is seeking. As this work scales, the alignment between the assessment and professional development will impact classroom practice, allowing students to engage with content more deeply in a way that will enhance their learning and ultimately student outcomes.

## WHERE DO WE GO FROM HERE: CREATING A CLEARER PATH FORWARD

As the three state deep dives illustrate, state leaders have started exploring assessments that are better aligned to student-centered learning, which in turn support student-centered teaching and learning practices. With a deliberate partnership and openness to innovation at both the federal and state level, more can be done to propel this movement nationwide. Within current federal requirements, there are opportunities to remove existing barriers and create a path for states. Looking ahead, we will need federal statutory and policy changes to realize the full potential of a comprehensive student-centered learning, teaching and assessment system.

### Recommendations for action

Below are recommendations for ways to support states from the start to explore innovative practices, and then have a path for scaling and sustaining their work of improving assessment for all.

- » **Create greater alignment in federal programs.** Federal programs intended to support assessment innovation should be better aligned to create the path for long-term sustainability. While states initially expressed excitement about the prospect of IADA, statutory and regulatory criteria proved too constraining for many, particularly when there is no funding associated with it, causing interest to shift to CGSA. In the short term, USED can deliberately connect IADA and CGSA by making innovation one of the priorities for the CGSA program as they did in 2020 and have now signaled they may do again in the next round of CGSA as part of the November IADA letter. USED should also partner with states to create the path for scaling statewide. Deliberately aligning CGSA and IADA, as well as other USED authorities, helps create a clear path for assessment innovation while ensuring commitment to equity.

Longer term, CGSA should be rewritten to have an explicit, consistent strand focused on innovation. While IADA was a useful start, a revamped CGSA that explicitly incentivizes innovation would pair the desire to innovate with the needed funding and help to streamline the process for states by reducing undue burden of applying for and managing two separate programs. Likewise, statutory language should explicitly allow for a broader understanding of assessment innovation so states know that investing in improving assessments will result in sustainable new systems.

- » **Improve IADA as a viable pathway.** Of all the states that have applied for IADA, only three of those approved are still pursuing the program. Two have since dropped out, and several others who applied were denied. There is a lot we can learn about what has worked well and what has impeded both state interest and success in achieving its goals. USED has signaled an openness to this through its response to the request for information and should continue to work with states to improve it.

Because the assessments are being used for federal accountability, state leaders and their technical assessment advisors note that IADA's requirements related to comparability create unnecessary burdens and limit the ability of states to fully realize their vision for innovation in assessment and accountability. In the November IADA Letter, USED demonstrates an openness to move from framing comparability as a comparison between a state's traditional assessment and its innovative assessment to an approach where a state could contribute evidence that the innovative assessment is aligned to outcomes, in particular the state content standards. 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 with 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 while more effectively supporting innovation.<sup>17</sup> Building on the November IADA Letter, USED can now support state leaders who want to demonstrate comparability more broadly through technical assistance and updates to the peer review process.

- » **Revamp the USED assessment peer-review process.** The goal of IADA, and in some cases CGSA, is for a state to have a new statewide assessment. For an innovative assessment to be used for federal accountability purposes it must pass USED's assessment peer review. USED can signal to state leaders that new types of assessments can make it through peer review by updating requirements to allow for assessment innovation within current federal law and policy. For example, USED could bring together a group of innovative-minded psychometricians to revise the Assessment Peer Review Guidance to better reflect the current field of assessment. This could provide clarity on what is possible with respect to important technical considerations such as alignment, comparability, depth and breadth. In addition to providing a path for approval for innovative assessment approaches, this would signal to the field USED's commitment to innovation.<sup>18</sup>
- » **Increase funding for innovative assessment work.** Meaningfully designing and implementing new assessment approaches requires significant investment, both in time and money. In the previous round of CGSA awards, the maximum amount a state could receive was \$3,000,000 over a period of up to 48 months. While this level of funding can seed new ideas, innovation at the magnitude our educators need and students deserve, requires significantly more investment. Given the current parameters of ESSA, states are expected to continue to administer their summative assessments while also working to develop innovative models. Therefore, to support sustainable innovation, they need a level of funding that realistically allows them, working closely with local communities, to make the changes required to promote assessment innovation.

Rather than having a threshold of spending that triggers funds for innovation, the next ESEA reauthorization should establish a consistent fund set aside for assessment innovation. In addition to programs like CGSA, federal funding could be used for planning grants to explicitly support states in the early stages of designing new assessment systems. Having resources to thoughtfully design new systems at the front end could foster longer-term success.

- » **Provide opportunities for innovative accountability.** Given the integrated nature of state assessment and accountability systems, states need an opportunity to design solution that address both. This would allow states to think coherently about their entire system from the start in a way that better prepares them to both complete the pilot and sustain their innovative approaches. Kentucky, for example, is deliberately addressing assessment and accountability as part of its work pursuant to CGSA, seeking to co-create with local communities the assessment and accountability design to support the needs of schools. Outside of CGSA and federal requirements, states like Colorado<sup>19</sup> and New Mexico<sup>20</sup> are already thinking differently about state-level accountability by designing new high school graduation requirements that include competency and innovative assessment options. Current accountability requirements are a serious constraint on the nature of assessment innovation and require related flexibility. In the short term, USED could encourage states to think about assessment and accountability coherently as a priority under CGSA. Long term, a revamped CGSA could more holistically integrates assessment and accountability.

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- » **Continue to foster partnerships between states and USED.** If a goal of CGSA and IADA is to foster innovative assessment systems that will require federal approval, USED and state leaders should embark on the work with a shared goal of sustainability and support. In partnership, they can discuss early and often what the state's path for ultimate approval of their new system will be so that the significant investment in the work has a lasting impact. Kentucky, for example, engages in regular discussions with USED about lessons learned from their CGSA-funded work. In the short term, USED can partner with state leaders to navigate the misalignment, working with them to piece together CGSA and IADA before looking ahead to how statutory flexibility or waiver authority will allow scaling and sustainability. State leaders can likewise rely on USED as trusted thought partners, problem solving together to achieve their vision. The November IADA Letter is an encouraging signal of USED's desire to work with states more effectively and we hope USED will continue to move in this direction.

## CONCLUSION

Students across the nation have unlimited potential, yet many are struggling to stay engaged and progress. The federal response to the challenges they face must mirror the severity of the problems. To truly move to student-centered learning at scale, education systems must be redesigned. Under the current structure, federally required summative assessments drive behaviors in schools that are often misaligned with student-centered classroom practice. State and district leaders are working to change that but face an uphill battle without appropriate federal support. Federal leaders can make changes that will foster increased innovation. If done well, the stories of today will inform the federal policy of tomorrow, showing us better ways to measure student learning while maintaining a deep commitment to accountability and equity.



# Appendix

## A PRIMER

### THE FEDERAL ROLE IN SUPPORTING ASSESSMENT INNOVATION

#### The Federal Competitive Grants for State Assessments program

The Competitive Grants for State Assessments (CGSA) was authorized to enhance the quality of assessment instruments and assessment systems used by states for measuring the academic achievement of elementary and secondary school students. State leaders frequently use the funding to pursue something that either complements their current statewide assessment system or is intended to replace some element of their summative assessment system.

Through the Elementary and Secondary Education Act (ESEA), guidelines were put in place for how the funds could be allocated. Discretionary grants can be made to state education agencies (SEAs) and consortia of SEAs for activities (to be carried out over a period of up to 48 months) to:

1. **Develop or improve assessments for English learners**
2. **Develop or improve models to measure and assess student progress or student growth on assessments**
3. **Develop or improve assessments for children with disabilities**
4. **Collaborate with institutions of higher education or other organizations to improve the quality, validity and reliability of State academic assessments**
5. **Measure student academic achievement using multiple measures from multiple sources**
6. **Evaluate student academic achievement using comprehensive academic assessment instruments (such as performance and technology-based academic assessments, computer adaptive assessments, projects or extended performance task assessments) that emphasize the mastery of standards and aligned competencies in a competency-based education model**

Within the parameters of the allowable uses of funds, USED has discretion to identify priorities for grant applicants in any given grant cycle. As required by federal regulations (34 CFR § 75.105(c) (3)), however, USED only considers applications that meet at least one of the applicable absolute priorities established for each competition. For the 2020 competition, there was a direct and explicit tie between CGSA grantmaking and SEA participation in IADA. For the 2022 competition, the focus shifted to prioritizing numbers five and six from the list above, emphasizing the need to think more holistically about how we understand and define students' progress and achievement.

Some states that develop new assessment instruments pursuant to CGSA will not require federal approval of these new approaches. Only those that intend to use the assessments for federal accountability purposes will eventually need to submit the assessment to USED for peer review approval.

## U.S. DEPARTMENT OF EDUCATION'S INNOVATIVE ASSESSMENT DEMONSTRATION AUTHORITY

IADA is designed to support states in implementing the new flexibility in the Every Student Succeeds Act (ESSA) to pilot innovative approaches to assessments. Several states have applied for IADA and sought funding through CGSA, aligning federal flexibility and funding to pursue assessment innovation. Other states only pursue IADA, and many states only pursue CGSA.

ESEA Section 1204, and corresponding Title I, part B regulations, allow the Secretary to grant flexibility to states, as described by USED, “to administer an innovative assessment in a subset of districts—instead of the statewide assessment—and to use those results for the purposes of accountability and reporting as the states scale the new systems to statewide use.” In a Notice of Final Rulemaking, USED highlighted some specific flexibilities and innovation opportunities:

- » **A state may develop an innovative assessment in all required grades and subjects, or a subset of them**
- » **The innovative assessment may, in any required grade or subject, include one or more types of innovative assessments and must produce an annual summative determination of each student’s mastery of grade-level content standards**
- » **An innovative assessment may include items above or below a student’s grade level so long as the state measures each student’s academic proficiency based on the challenging state academic content standards for the grade in which the student is enrolled**

The term “innovative assessment system” means a system of assessments that may include— (1) competency-based assessments, instructionally embedded assessments, interim assessments, cumulative year-end assessments or performance-based assessments that combine into an annual summative determination for a student, which may be administered through computer adaptive assessments; and (2) assessments that validate when students are ready to demonstrate mastery or proficiency and allow for differentiated student support based on individual learning needs. (ESSA Section 1204)

Among an extensive set of requirements, states must:

- » **Demonstrate how the proposed innovative assessment does, or will, meet statutory requirements for the alignment, quality and fairness of the innovative assessment**
- » **Ensure that districts and schools participating in the innovative assessment demonstration pilot are providing comparable results to one another**
- » **Describe their approach to scaling the innovative assessment statewide, including criteria for selecting participating districts and benchmarks toward achieving implementation in demographically representative districts and schools over time**
- » **At the end of the pilot/demonstration stage, the law and final regulations require states to submit their innovative assessments for assessment peer review, under Title I, part A, consistent with other statewide assessments**

While both promote advances to assessment, there are important distinctions between CGSA and IADA. For example, IADA requires intent to eventually meet statutory requirements for use in an approved federal system, whereas CGSA does not. To that end, IADA requires annual demonstrations of comparability to current assessments, CGSA does not. IADA requires an approach to scale statewide, CGSA does not. CGSA is a grants/funding program, IADA is not. IADA defines innovative

assessment system; CGSA can be used for innovation, but the focus is on improving assessments. All these considerations likely inform state leaders' decision making when determining what federal path to pursue.

## **FLEXIBILITY WITHIN THE EVERY STUDENT SUCCEEDS ACT'S STATE ASSESSMENT REQUIREMENTS**

Within Title I, part A of ESSA, Section 1111 requires any state seeking a grant under this part of the law to submit a qualifying plan (State Plan) to USED for peer review and Secretarial approval which, among other things, demonstrates the state has implemented a set of high-quality student academic assessments in mathematics, reading or language arts and science. Requirements for such assessments are extensive and focused on fairness, quality and transparency. Opportunities for innovation include:

- » The option to implement multiple statewide interim assessments during the course of the academic year that result in a single summative assessment score, rather than a single summative assessment
- » The option to develop computer-adaptive tests, which “may provide a more precise estimate of a student’s ability with fewer questions than traditional tests” <sup>21</sup>
- » Flexibility for districts to use locally-selected, nationally-recognized high school academic assessments, rather than the statewide high school assessments
- » The option to allow students taking advanced mathematics courses in eighth grade to take an assessment administered to high school students, rather than the assessment developed for their grade
- » The option to assess students with the most significant cognitive disabilities on alternate assessments aligned to students’ needs

## **U.S. Department of Education’s waiver authority**

Under ESSA Section 8401, an SEA or Indian tribe may submit a request to the Secretary to waive any statutory or regulatory requirement of the ESEA, within limitations established in ESSA. An SEA may also submit a waiver request on behalf of a local educational agency (LEA). A waiver request must include a plan identifying the statutory or regulatory requirements to be waived, describing how the waiver will advance student academic achievement, methods to be used to monitor and evaluate the implementation of the plan and more.

# Citations

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2. A more comprehensive description of each of these provisions can be found in the [Appendix](#).
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## AUTHORS

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The Aurora Institute is a non-profit organization that seeks to transform education systems and accelerate the advancement of breakthrough policies and practices to ensure high-quality learning for all K-12 learners. Aurora is shaping the future of teaching and learning for more than 14 million students each year through its work in policy, research, and field-building convenings. We aim to build a world where all students, but especially for those who have been historically underserved, attain the knowledge, skills, and dispositions necessary to achieve long-term success, contribute to their communities and advance society.



The Center for Assessment, founded in 1998, strives to increase student learning through more meaningful educational assessment and accountability practices. We engage in deep partnerships with state and district education leaders to design, implement, and evaluate assessment and accountability policies and programs, and to design technically sound policy solutions to support important educational goals.



The Center for Innovation in Education, is a national non-profit working at the intersection of policy, practice, innovation and equity. We work with state and local partners to transform learning, assessment of learning and systems of accountability in service of expanding opportunity, voice, and belonging.



Envision Learning Partners (ELP) is a nonprofit consultant and PD provider dedicated to helping school districts engage every one of their students in a high-quality system of performance assessment. An innovative and balanced assessment system is a powerful lever for deepening learning and driving toward equitable outcomes because it focuses every layer of the district on improving the quality of student work.



The Great Schools Partnership is a 501(c)(3) nonprofit school-support organization working to redesign public education and improve learning for all students. Working at all levels of the education system, from the classroom to the statehouse, the Great Schools Partnership provides school and district coaching, professional development, and technical assistance to educators, schools, districts, organizations, and government agencies.



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