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Director of the Strategic Collections and Clearance  
Governance and Strategy Division  
U.S. Department of Education  
400 Maryland Ave. SW, LBJ, Room 6W208B  
Washington, DC 20202-8240

**Docket ID:** ED-2020-SCC-0144

**Comment Request:** Evaluation of the Innovative Assessment Demonstration Authority Pilot Program-Survey Data Collection

To Whom It May Concern:

Any time we forge a new path, it is important to measure progress and evaluate what we have learned. The IADA pilots are a great example of this. Evaluating and sharing the process, progress, challenges and successes of the IADA pilots is relevant. It is also critical to ensure that we are evaluating innovative pilots through a lens of innovation, and not a lens of tradition alone.

The IADA program set the stage for states and districts to develop innovative ways to measure student success in a changing world. The coronavirus has pushed our entire education system to adapt, making innovative solutions more relevant than ever. New conditions resulting from the pandemic underline the need for novel approaches to evaluating students' academic performance and addressing their learning needs. The pilots initiated through the IADA program can inform how innovative solutions are scaled into larger systems, especially if they are evaluated in the context of new models of teaching and learning, and not in the tradition of NCLB assessments. To that end, we suggest considering the following:

1. **Best practices must go beyond tradition, and include a renewed focus on equity, validity, and efficacy.** Information cannot be gathered and evaluated using traditional assessment development paradigms alone, as the traditional "best practices" for generating standalone summative tests restrict opportunities for innovation. In some cases, the "traditional" interpretations and assumptions about fundamentals such as comparability create significant hurdles to innovation and success. As IADA pilots are being developed (even before classroom implementation), technical experts at the state, district, vendor, and TAC levels are wrestling with these challenges, and this in itself is an important lesson learned. Tests that measure students exactly the same way we have historically in order to provide merely "comparable" data are not truly innovative; instead, our nation must consider flexibilities and adaptations from our traditional assessment models. *We recommend that the "best practices" are not simply summaries of the IADA programs, but rather that they document new ways to measure the "quality" and "efficacy" of innovative assessments. To this end, an equity lens should be used to evaluate whether innovations are better measures of what students know and can do, or are merely repackaged versions of current assessment models and practices that will only reinforce and perpetuate equity gaps.*
2. **Evaluation of projects should keep the reasons for innovating at the forefront.** IADA projects are being undertaken to address perceived flaws in the current system. Traditional norms of assessment are not the way to evaluate the success of these pilots. If the evaluation examines factors such as comparability through a traditional lens only, the system is limited to building different versions of the current system, and it would be better to stick with the system as is than to invest time and resources that do not truly allow for meaningful innovation. *We recommend that evaluation encourage alternate ways of looking at comparability to account for systems change innovation is intended to bring.*

3. **Design of assessments should impact the data collection process.** While we appreciate the desire to evaluate these programs in a manner that creates as little burden as possible, it is essential that the evaluation includes a lens on innovation that departs from the traditional methods of examining stand-alone summative tests. Many of the IADA pilots are focused on providing more frequent information to teachers throughout the year to drive instructional change and allow teachers to see the impacts of instructional shifts before an end-of-year postmortem. Asking educators to reflect on the utility of this information at year's end presents challenges, as it is harder after the year is over to recall details about instructional adjustments and outcomes that occurred throughout the year. *We recommend evaluating the utility of the data when the teachers are receiving and utilizing it – at the end of each testing window – instead of at the end of the school year.*
4. **Technical experts should be surveyed to discuss challenges.** It will be important to understand the technical validity and efficacy of innovative assessment designs. While discussions with teachers and district leaders are important, assessment “experts” who are typical peer reviewers or who sit on TACs will also be important stakeholders to help understand where current systems, tradition and expectations may be creating barriers to adequate progress in designing and implementing innovations. *We recommend the technical experts engaged in the processes must be consulted during the evaluation to investigate the roadblocks, lessons learned, and best practices.*
5. **Purpose and utility of data should be at the center of analysis.** Assessment results and impacts to learning resulting from innovative assessment solutions should look different than traditional assessments, as the idea of a new assessment paradigm is to make improvements – not to sustain the status quo. *We recommend that the IADA progress report and best practices evaluation assess what educators can do differently with student data as well as changes in student performance.*
6. **Evaluation of projects should take into account the stage of project development.** IADA projects are all at different stages in the development process, and best practices will look different based on the stage of development in which the projects are operating. Not all teachers in pilot districts may be deeply engaged in the earlier development stages of their IADA project. For IADA pilots in which the assessments are implemented and data is being returned, it is appropriate to evaluate professional learning and instructional changes; for IADA pilots in which the assessments are still being developed, it makes sense to ask the educators who are engaged in building the assessments for feedback on the collaborative process. *We recommend that the collection of data from educators be informed by the stage of development in which each of the IADA projects is operating to obtain the most accurate representation of best practices at each stage of project development.*

Thank you for the opportunity to provide comments on this critical evaluative effort for assessment innovation. We look forward to supporting the work of the USED and students, educators, and leaders across the country. Please do not hesitate to contact us for additional comments and support.



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