

The Future of Innovative Assessment Demonstration Authority (IADA)

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[The Future of IADA slides 1–6]

Dr. Peasley outlined the agenda for this plenary session and provided background information on IADA. He explained that Section 1204 of the ESEA permits ED to allow SEAs to (1) implement a pilot of a new assessment system in a small number of schools or LEAs and (2) evaluate that new assessment system while maintaining the existing state assessment for the rest of the state. The regulations for definitions, application requirements, selection criteria, timelines, transitions, and extensions and waivers are listed in 34 CFR § 200.104–108. Since 2016, ED has approved five states (Georgia, Louisiana, Massachusetts, New Hampshire, and North Carolina) to participate in IADA. Subsequently, two states withdrew (New Hampshire in 2021 and Georgia in 2022). ED offered four application windows from 2018 through 2021. No states applied in 2021. More information on all pilots (applications and annual reports) can be found at <https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/iada>. Dr. Peasley introduced Elizabeth Ty Wilde of the Institute of Education Science (IES), the research arm of ED.

[The Future of IADA slides 7–28]

Dr. Wilde remarked that the goal of IADA—established by Congress in 2015—is to help states have better assessments within five years to guide their instruction and accountability. The program provides flexibility but no funding. States approved for IADA must show that their innovative assessments meet most requirements for federal accountability, and they are expected to implement the new assessments statewide within five years. [*Evaluating the Federal Innovative Assessment Demonstration Authority: Early Implementation and Progress of State Efforts to Develop New Statewide Academic Assessments*](#) (released in April 2023) describes the progress of the first five IADA systems through the 2020–21 school year. The report is primarily based on an analysis of states' IADA applications and performance reports to ED and is part of a broader evaluation of IADA required by Congress. ED also will submit a second report on best practices.

The first report examined four major questions:

- What were the key objectives and features of the IADA systems?
- How ready were the IADA systems to meet early program expectations?
- How far along were the IADA systems after 2020–21?
- What challenges did IADA systems report?

The evaluation found that the IADA systems use different approaches, but all target the program's goals of increasing the timeliness and relevance for instruction. All five projects aimed to increase timely access to data during the school year and to make data more

meaningful and relevant for teaching. At the start of the demonstration program, some systems were more ready than others to administer operational assessments, an early program expectation. Only one system (New Hampshire's Performance Assessment of Competency Education [PACE]) started IADA ready to administer an operational assessment within a year. Other systems needed more work to be ready, with the extent of required work varying.

Although system established some foundation for operationalizing assessments, they made limited progress in the first years of demonstration. Some states had initial planning or preparation activities to complete by 2020–21. However, most systems are not yet advancing through the major implementation activities (e.g., completing professional development and item testing). Challenges hampered IADA system development and implementation—with the COVID-19 pandemic causing a major disruption because of limitations on in-person activities and effects on testing. For example, most states reported that recruiting and preparing school districts to participate in the new assessment system was a challenge. Other common challenges included limited capacity and managing stakeholder expectations. Dr. Wilde summarized the key findings of the report. Although all five IADA systems intended to increase the usefulness of their assessments, few could use their assessments within a year. Additionally, the systems had only made limited progress by 2020–21, and states reported several implementation challenges—with the COVID-19 pandemic causing major disruptions. Dr. Wilde also noted that IADA systems reported challenges prior to the pandemic that were related to how information about the program was disseminated, concerns from districts about extra burdens, and the capacity to manage expectations through professional development.

Regarding the future of IADA, Dr. Wilde noted that the struggles experienced by all five systems during the demonstration period raise three questions for policymakers to consider: (1) How are states weighing the benefits and costs of participating? (2) Is IADA truly facilitating “innovation”? (3) What additional federal supports are possible for IADA? ED will submit a second report to Congress with the goal of informing the development, implementation, and innovative assessment practices that might benefit IADA systems. This report will focus on the following questions:

- How innovative are the IADA assessments using Congress and ED's definitions of “innovation”?
- How far have the IADA systems gotten in terms of the objectives of IADA (overall and since the first report)?
- What challenges make it difficult for IADA systems to meet IADA's goals?
- What development and implementation practices worked well for IADA systems?

To prepare the next report, ED will collect annual performance reports for IADA participants through SY 2022–23 (winter 2023). Staff members will also interview state assessment officials in current and former IADA systems and in non-IADA systems (spring 2024). Technical advisory committees (TACs) for statewide assessment and vendors working with IADA systems will also participate in interviews with ED (spring 2024). ED expects to publish the report in early 2025.

Dr. Wilde commented that ED may ask conference participants for information or referrals to individuals to discuss the IADA program.

[The Future of IADA slides 29–43]

Dr. Peasley discussed ED's April 2023 RFI, which sought stakeholder feedback regarding alternative methods of establishing the comparability of the IADA pilot and the current state assessment, IADA timelines, and other perceived barriers to IADA participation. ED received 8,846 comments (although 8,800 of these were duplicates from a large writing campaign). ED staff members have reviewed the 46 unique comments received. Comments can be viewed at <https://www.regulations.gov/docket/ED-2023-OESE-0043/comments?sortBy=postedDate&sortDirection=desc>. Sorting comments from newest to oldest will display the majority of unduplicated comments.

ED has now expanded the opportunity for IADA participation. The ESEA statute limited the number of states that could be approved under IADA to seven during the “initial demonstration period.” Given that the first state was approved in 2018 and the publication of the IES report was in 2023, the “initial demonstration period” has ended. All interested states can now apply either individually or as part of a consortium for approval in the IADA. ED is establishing two regular submission windows for IADA applications per calendar year: (1) the first Friday in May (for review and approval prior to the upcoming school year) and (2) the first Friday in December (for review and approval in the spring prior to the upcoming school year).

Regarding comparability, Dr. Peasley noted that the statute requires (under ESEA Section 1204[e][2][A]) that any alternative comparability method must ensure that the pilot assessment “could express student results or student competencies in terms consistent with the State’s aligned academic achievement standards under section 1111(b)(1)” and “generate results that are valid and reliable, and comparable [with the statewide assessment], for all students and for each subgroup of students.” Therefore, any evaluation of alignment must consider both the state’s content and the state’s achievement standards. The ESEA regulations (34 CFR §200.105 [b][4][i][A–E]) provide five methods for evaluating comparability:

1. Administering full assessments from both the innovative assessment system and the statewide assessment system to all students enrolled in participating schools.
2. Administering full assessments from both the innovative assessment system and the statewide assessment system to a demographically representative sample of all students and subgroups of students.
3. Including as a portion of the innovative assessment system items or performance tasks from the statewide assessment system that have been previously pilot- or field-tested for use in the statewide assessment system.
4. Including as a portion of the statewide assessment system items or performance tasks from the innovative assessment system that have been previously pilot- or field-tested for use in the innovative assessment system.
5. An alternative method for demonstrating comparability that an SEA can demonstrate will provide for an equally rigorous and statistically valid comparison between student

performance on the innovative assessment and student performance on the statewide assessment.

A comparability evaluation can be based on evidence of the alignment of both the innovative assessment and the statewide assessment to the content standards. Comparability can also be shown by evidence of the consistency of achievement classifications across the two systems. When applying for IADA, states must describe a plan to evaluate comparability once the IADA pilot is implemented. ED expects that this comparability plan will have the potential to satisfy IADA statute and regulations. However, ED does not expect that states will have established the comparability of the IADA pilot at the time of the IADA application. A state does not need to have comparability at the scale score level. The intent of comparability is focused on consistency of achievement level classifications, given that IADA is used in accountability determinations.

Dr. Peasley provided an example of an “alternative” method of comparability from IADA. In New Hampshire’s IADA pilot, the state used a “non-concurrent” comparability approach. As an example, the state compared the results of students taking the grade 3 reading/language arts (R/LA) statewide assessment in 2017–18 with results for the same students taking the grade 4 PACE R/LA pilot assessment in 2018–19. The state compared the achievement level match across tests and years and asserted that these results “demonstrated remarkable consistency of expectations for the same students as we would expect some growth to proficiency from one year to the next.” New Hampshire also found positive moderate correlations between the state test and PACE, which was “noteworthy given the intentional differences in design and purpose of the assessments.” For more information, see page 117 at <https://www2.ed.gov/admins/lead/account/iada/nh-annual-perf-rpt1819.pdf> for the presentation of non-concurrent validity comparisons of New Hampshire’s PACE pilot with the New Hampshire statewide assessment.

Programs other than IADA also provide examples of alternative methods. States that have implemented the nationally recognized, locally selected high school assessment flexibility of the ESEA (Section 1111[b][2][H]) have demonstrated comparability between the statewide assessment and the nationally recognized assessment using this approach, based on evidence of alignment for both assessments and consistency of achievement classifications for both assessments. Currently, Mississippi, North Dakota, and Oklahoma have been approved to permit a district to administer a nationally recognized, locally selected high school assessment in lieu of the statewide assessment. This is discussed in CE 7.3, pages 76–77, in *A State’s Guide to the U.S Department of Education’s Assessment Peer Review Process* (<https://www2.ed.gov/admins/lead/account/saa/assessmentpeerreview.pdf>).

This critical element describes how states must demonstrate that the nationally recognized high school assessment is equivalent to or more rigorous than the statewide assessment with respect to the coverage of academic content, the difficulty of the assessment, the overall quality of the assessment, and any other aspects of the assessment that the state has established in its technical criteria. For this comparability evaluation, states can produce valid and reliable data

on student academic achievement with respect to all high school students as well as each subgroup.

Regarding IADA funding opportunities, Dr. Peasley noted that ED's two most recent competitions for the Competitive Grants for State Assessments (CGSA) program provided grants that support IADA planning and implementation explicitly, as well as other grants that support state development of new assessment designs. The purpose of the CGSA program is to enhance the quality of assessment instruments and assessment systems used by states for measuring the academic achievement of elementary and secondary school students. All of the CGSA statutory uses of funds are well aligned with IADA, and ED encourages states to propose ideas that align with IADA in their future CGSA applications. Between the 2020 CGSA competition and the 2022 CGSA competition, ED funded 13 projects (more than \$35 million in total) involving innovative assessment planning, development, or design and implementation. The abstracts of these projects can be found at <https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/competitive-grants-for-state-assessments/awards>. Congress appropriated \$20.9 million for CGSA in fiscal year (FY) 2023, and a competition is forthcoming later this school year. ED will provide more information as it is available.

In closing, Dr. Peasley announced ED's open call for assessment peer reviewers. ED is always seeking additional experts to serve as peer reviewers of state assessment systems, for IADA applications, and for CGSA applications. A reviewer checklist is available at <https://oese.ed.gov/files/2022/07/Assessment-Peer-Reviewer-Checklist-2022-23.pdf> or <https://oese.ed.gov/files/2022/07/Assessment-Peer-Reviewer-Checklist-2022-23.docx>.