



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Richard Woods
State Superintendent
Georgia Department of Education
205 Jesse Hill Jr. Drive SE
Atlanta, GA 30334

July 12, 2019

Dear Superintendent Woods:

Thank you for submitting Georgia Department of Education's (GaDOE) application for the Innovative Assessment Demonstration Authority (IADA) authorized in section 1204 of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA). I appreciate the work of you and your team to develop this IADA proposal.

As you know, the U.S. Department of Education (Department) conducted, as required by the statute, a peer review of the application. Peer reviewers examined the application using the program requirements and selection criteria described in 34 CFR §§ 200.105 and 200.106. On March 8, 2019, the Department requested additional information based on our review of the peer feedback and our own analysis of Georgia's application. GaDOE provided this information on May 31, 2019.

After reviewing the initial application and GaDOE's additional information, I am pleased to approve GaDOE to implement two of the innovative assessment models described in the State's application—

- The Georgia Map Partnership
- The Putnam County Consortium

This approval is granted in accordance with section 1204 of the ESEA and 34 CFR §§ 200.104-200.108. GaDOE may exercise this authority through the 2023–2024 school year. GaDOE must ensure that all students in grades three through eight, and once in high school, are assessed on either an innovative assessment or the State's assessments under section 1111(b)(2)(B) of the ESEA and include the results in accountability determinations in accordance with section 1111(c) and (d) of the ESEA. In addition, I want to remind GaDOE that the intent of IADA is to pilot innovative assessments to determine by the end of the demonstration period whether the assessment should be administered statewide as the State's assessment. Therefore, GaDOE will need to determine by the end of the demonstration authority which *one* assessment it will administer to all Georgia students.

I also note that, for the Putnam County Consortium, the information provided by GaDOE indicates that the pilot assessment will not be able to provide data necessary for one component

400 MARYLAND AVE., SW, WASHINGTON, DC 20202
www.ed.gov

The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

of the GaDOE accountability system, the readiness “literacy” indicator that is a component of the College and Career Ready Performance Index (CCRPI). As you know, a requirement of this authority is that the schools administering the pilot assessments use the results in the State’s accountability system each year in which they participate in the pilot. As a result, this approval for the Putnam County Consortium is conditioned on the State providing information for how it will provide data for this element of the State’s accountability system such that the schools administering the Putnam County Consortium are included in the State’s accountability system in the same manner as all other public schools in the State. GaDOE must provide this information by October 31, 2019, so that the schools participating in Putnam County Consortium and the Department understand how the schools will be held accountable for this measure prior to the administration of the pilot assessment.

I am declining to approve the GaDOE to implement the Cobb County School District assessment model at this time. After a careful review and evaluation of the application and additional information submitted regarding this model, the Department finds that this model does not meet a significant number of the requirements and selection criteria for the IADA. The specific areas where this model does not meet the requirements and selection criteria are described in an attachment to this letter. GaDOE may choose to address the areas identified and request reconsideration to include this assessment model in the IADA in the future.

I congratulate you on receiving this authority for GMAP and the Putnam County Consortium models to explore innovative ways to better assess student achievement in Georgia. Thank you for the important work that you and your staff are doing to support the innovation that is possible through the ESEA. The Department looks forward to working with you and learning from you as you implement Georgia’s innovative assessments. If you have any questions, please contact my staff at: ESEA.Assessment@ed.gov.

Sincerely,

/s/
Frank T. Brogan
Assistant Secretary
for Elementary and Secondary Education

Enclosures

cc: Allison Timberlake, Deputy Superintendent Assessment and Accountability

Items that Require Additional Information or Revision in Georgia’s Innovative Assessment Demonstration Authority Plan

Regulatory Requirement	Required information from the SEA
<p>(3) Express student results or competencies consistent with the challenging State academic achievement standards under section 1111(b)(1) of the Act and identify which students are not making sufficient progress toward, and attaining, grade-level proficiency on such standards.</p>	<p>For the Cobb County School District (CCSD) model, a plan to express student results in terms of the State’s academic achievement standards (e.g., What are the psychometric linking designs/decisions inherent in the scaling plan for the CCSD test? What justifications are there to support the scaling plan for the test?).</p>
<p>(4)(i) Generate results, including annual summative determinations as defined in paragraph (b)(7) of this section, that are valid, reliable, and comparable for all students and for each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act, to the results generated by the State academic assessments described in 34 CFR 200.2(a)(1) and section 1111(b)(2) of the Act for such students.</p> <p>Consistent with the State educational agency’s (SEA’s) or consortium’s evaluation plan under 34 CFR 200.106(e), the SEA must plan to annually determine comparability during each year of its demonstration authority period in one of the following ways:</p> <p>(A) Administering full assessments from both the innovative and statewide assessment systems to all students enrolled in participating schools, such that at least once in any grade span (i.e., 3-5, 6-8, or 9-12) and subject for which there is an innovative assessment, a statewide assessment in the same subject would also be administered to all such students. As part of this determination, the innovative assessment and statewide assessment need not be administered to an individual student in the same school year.</p> <p>(B) Administering full assessments from both the innovative and statewide assessment systems to a demographically representative sample of all students and subgroups of students described in section 1111(c)(2) of the Act, from among those students enrolled in</p>	<p>For the CCSD model, an explanation of how pilot assessments will result in valid and reliable estimates of student achievement, including the specific comparability analyses that are proposed.</p>

Regulatory Requirement	Required information from the SEA
<p>participating schools, such that at least once in any grade span (i.e., 3-5, 6-8, or 9-12) and subject for which there is an innovative assessment, a statewide assessment in the same subject would also be administered in the same school year to all students included in the sample.</p> <p>(C) Including, as a significant portion of the innovative assessment system in each required grade and subject in which both an innovative and statewide assessment are administered, items or performance tasks from the statewide assessment system that, at a minimum, have been previously pilot tested or field tested for use in the statewide assessment system.</p> <p>(D) Including, as a significant portion of the statewide assessment system in each required grade and subject in which both an innovative and statewide assessment are administered, items or performance tasks from the innovative assessment system that, at a minimum, have been previously pilot tested or field tested for use in the innovative assessment system.</p> <p>(E) 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 the statewide assessment, including for each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act;</p> <p>(ii) Generate results, including annual summative determinations as defined in paragraph (b)(7) of this section, that are valid, reliable, and comparable, for all students and for each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act, among participating schools and local educational agencies (LEAs) in the innovative assessment demonstration authority. Consistent with the SEA’s or consortium’s evaluation plan under 34 CFR 200.106(e),</p>	

Regulatory Requirement	Required information from the SEA
<p>the SEA must plan to annually determine comparability during each year of its demonstration authority period.</p>	
<p>(8) Provide disaggregated results by each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act, including timely data for teachers, principals and other school leaders, students, and parents consistent with 34 CFR 200.8 and section 1111(b)(2)(B)(x) and (xii) and section 1111(h) of the Act, and provide results to parents in a manner consistent with paragraph (b)(4)(i) of this section and part 200.2(e).</p>	<p>For the CCSD model, and as noted under (3) above, information describing a plan (which would address psychometric linking designs/decisions and provide justifications) to express student results in terms of the State’s academic achievement standards is needed in order to report results for all required sub-groups.</p>
<p>(9) Provide an unbiased, rational, and consistent determination of progress toward the State’s long-term goals for academic achievement under section 1111(c)(4)(A) of the Act for all students and each subgroup of students described in section 1111(c)(2) of the Act and a comparable measure of student performance on the Academic Achievement indicator under section 1111(c)(4)(B) of the Act for participating schools relative to non-participating schools so that the SEA may validly and reliably aggregate data from the system for purposes of meeting requirements for--</p> <p>(i) Accountability under sections 1003 and 1111(c) and (d) of the Act, including how the SEA will identify participating and non-participating schools in a consistent manner for comprehensive and targeted support and improvement under section 1111(c)(4)(D) of the Act; and</p> <p>(ii) Reporting on State and LEA report cards under section 1111(h) of the Act.</p>	<p>For the CCSD model, the State must provide a plan (which would address psychometric linking designs/decisions and provide justifications) to express student results in terms of the State’s academic achievement standards.</p>

Application Selection Criteria	Required information from the SEA
<p>(a)(3) If the system will initially be administered in a subset of schools or LEAs in a State--</p>	<p>For the CCSD model, information about benchmarks toward achieving implementation across participating schools that are, as a group, demographically similar to</p>

Application Selection Criteria	Required information from the SEA
<p>(i) The strategies the SEA, including each SEA in a consortium, will use to scale the innovative assessment to all schools statewide, with a rationale for selecting those strategies;</p> <p>(ii) The strength of the SEA’s or consortium’s criteria that will be used to determine LEAs and schools that will initially participate and when to approve additional LEAs and schools, if applicable, to participate during the requested demonstration authority period; and</p> <p>(iii) The SEA’s plan, including each SEA in a consortium, for how it will ensure that, during the demonstration authority period, the inclusion of additional LEAs and schools continues to reflect high-quality and consistent implementation across demographically diverse LEAs and schools, or contributes to progress toward achieving such implementation across demographically diverse LEAs and schools, including diversity based on enrollment of subgroups of students described in section 1111(c)(2) of the Act and student achievement. The plan must also include annual benchmarks toward achieving high-quality and consistent implementation across participating schools that are, as a group, demographically similar to the State as a whole during the demonstration authority period, using the demographics of initially participating schools as a baseline.</p>	<p>the State as a whole during the demonstration authority period for each model (e.g., How will CCSD and/or the State support expansion beyond Cobb County schools? What specific steps will be taken to ensure that additional schools are able to implement this assessment, if it is chosen as the statewide assessment at the completion of the demonstration period?).</p>
<p>(b)(1) The extent and depth of prior experience that the SEA, including each SEA in a consortium, and its LEAs have in developing and implementing the components of the innovative assessment system. An SEA may also describe the prior experience of any external partners that will be participating in or supporting its demonstration authority in implementing those components. In evaluating the extent and depth of prior experience, the Secretary considers—</p> <p>(i) The success and track record of efforts to implement innovative assessments or innovative assessment items aligned to the</p>	<p>For the CCSD model, information regarding the qualifications of external psychometric consultants to be used on the pilot assessments.</p>

Application Selection Criteria	Required information from the SEA
<p>challenging State academic standards under section 1111(b)(1) of the Act in LEAs planning to participate; and</p> <p>(ii) The SEA’s or LEA’s development or use of--</p> <p>(A) Effective supports and appropriate accommodations consistent with 34 CFR part 200.6(b) and (f)(1)(i) and section 1111(b)(2)(B)(vii) of the Act for administering innovative assessments to all students, including English learners and children with disabilities, which must include professional development for school staff on providing such accommodations;</p> <p>(B) Effective and high-quality supports for school staff to implement innovative assessments and innovative assessment items, including professional development; and</p> <p>(C) Standardized and calibrated tools, rubrics, methods, or other strategies for scoring innovative assessments, with documented evidence of the validity, reliability, and comparability of annual summative determinations of achievement, consistent with 34 CFR part 200.105(b)(4) and (7).</p>	
<p>(c)(1) The extent to which the timeline reasonably demonstrates that each SEA will implement the system statewide by the end of the requested demonstration authority period, including a description of—</p> <p>(i) The activities to occur in each year of the requested demonstration authority period;</p> <p>(ii) The parties responsible for each activity; and</p> <p>(iii) If applicable, how a consortium’s member SEAs will implement activities at different paces and how the consortium will implement interdependent activities, so long as each non-affiliate member SEA begins using the innovative assessment in the same school year consistent with 34 CFR part 200.104(b)(2).</p>	<p>With regard to the timeline for the CCSD model:</p> <ol style="list-style-type: none"> 1. Clarify what grade levels/groups of students will be in the field tests each year. 2. Clarify what the difference is between the “field tests” and “districtwide implementation at all the grade levels” that are both listed in year 2 of the timeline.