



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable John White  
State Superintendent  
Louisiana Department of Education  
P.O. Box 94064  
Baton Rouge, LA 70804-9064

June 5, 2018

Dear Superintendent White:

Thank you for submitting Louisiana's 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.

I am writing to provide initial feedback based on the U.S. Department of Education's (the Department's) review of LDOE's IADA application. As you know, in addition to the Department's review of the application, we 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. The goal of the peer review was to inform the Department regarding whether the proposed system is comparable to the State assessments, valid, reliable, of high technical quality, consistent with relevant, nationally recognized professional and technical standards, and provides unbiased, rational, and consistent determinations of progress toward meeting the ambitious, State-designed long-term goals for academic achievement.

Based on our review of the peer feedback and our own analysis of the application, I am requesting additional information to ensure the State's application meets all statutory and regulatory requirements, as detailed in the enclosed table. In addition, information is requested to strengthen your State's application regarding several of the selection criteria. I am also enclosing a copy of the peer technical review forms. Please note that the Department's feedback may differ from that contained in the peer review form. I encourage you to read the full peer review forms for additional suggestions and recommendations regarding LDOE's application. Department staff will contact you to support Louisiana in addressing the items enclosed with this letter.

ESEA section 1204(f)(4) requires the Department to issue a written determination within 90 days of a State's submission of its IADA application, which is July 1, 2018 for the LDOE application. Given this statutory requirement, I ask that you provide the requested additional information and submit it through OMB Max by June 19, 2018. If you would like more time to submit additional information, please contact your Office of State Support Program Officer in writing and indicate your new submission date. Please recognize that if the Department accommodates your request

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for additional time, a determination on the LDOE IADA application may be rendered after the 90-day period.

Thank you for the important work that you and your staff are doing to support the innovation that is possible through the ESSA. The Department looks forward to working with you to ensure that all children have the opportunity to reach their full potential.

Sincerely,

/s/

Jason Botel  
Principal Deputy Assistant Secretary,  
Delegated the Authority to Perform the  
Functions and Duties of the Assistant  
Secretary of Elementary and Secondary  
Education

Enclosures

cc: Rebecca Kockler, Assistant Superintendent of Academic Content

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

<b>Regulatory requirement</b>	<b>Required information from the SEA</b>
<p><b><u>Consultation.</u> Evidence that the SEA or consortium has developed an innovative assessment system in collaboration with--</b></p> <p>(1) Experts in the planning, development, implementation, and evaluation of innovative assessment systems, which may include external partners; and</p> <p>(2) Affected stakeholders in the State, or in each State in the consortium, including--</p> <p>(i) Those representing the interests of children with disabilities, English learners, and other subgroups of students described in section 1111(c)(2) of the Act;</p> <p>(ii) Teachers, principals, and other school leaders;</p> <p>(iii) Local educational agencies (LEAs);</p> <p>(iv) Representatives of Indian tribes located in the State;</p> <p>(v) Students and parents, including parents of children described in paragraph (a)(2)(i) of this section; and</p> <p>(vi) Civil rights organizations.</p>	<p>Evidence that the State has developed an innovative assessment system in collaboration with affected stakeholders in the State, including those representing the interests of children (including children with disabilities, English learners, and other sub-groups of students described in section 1111(c)(2) of the ESEA), students and parents, teachers, civil rights organizations, and, if applicable, representatives of Indian tribes located in the State.</p>
<p><b><u>Innovative assessment system.</u> A demonstration that the innovative assessment system does or will--</b></p> <p>(1) Meet the requirements of section 1111(b)(2)(B) of the Act, except that an innovative assessment--</p> <p>(i) Need not be the same assessment administered to all public elementary and secondary school students in the State during the demonstration authority period described in 34 CFR 200.104(b)(2) or extension period described in 34 CFR 200.108 and prior to statewide use consistent with 34 CFR 200.107, if the innovative assessment system will be administered initially to all students in participating schools within a participating LEA, provided that the statewide academic assessments under 34 CFR 200.2(a)(1) and section 1111(b)(2) of the Act are administered to all students in any non-participating LEA or any non-participating school within a participating LEA; and</p> <p>(ii) Need not be administered annually in each of grades 3-8 and at least</p>	<p>LDOE must clarify that at the end of the demonstration authority, the State will require all students to participate in the same statewide assessment that measures the same challenging academic standards, as required in ESEA section 1111(b).</p>

Regulatory requirement	Required information from the SEA
<p>once in grades 9-12 in the case of reading/language arts and mathematics assessments, and at least once in grades 3-5, 6-9, and 10-12 in the case of science assessments, so long as the statewide academic assessments under 34 CFR 200.2(a)(1) and section 1111(b)(2) of the Act are administered in any required grade and subject under 34 CFR 200.5(a)(1) in which the SEA does not choose to implement an innovative assessment.</p>	
<p>(2)(i) Align with the challenging State academic content standards under section 1111(b)(1) of the Act, including the depth and breadth of such standards, for the grade in which a student is enrolled; and                      (ii) May measure a student’s academic proficiency and growth using items above or below the student’s grade level so long as, for purposes of meeting the requirements for reporting and school accountability under sections 1111(c) and 1111(h) of the Act and paragraphs (b)(3) and (b)(7)-(9) of this section, the State measures each student’s academic proficiency based on the challenging State academic standards for the grade in which the student is enrolled;</p>	<p>No evidence required.</p>
<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>No evidence required.</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. Consistent with the 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 <b>one of the following ways:</b>                      (A) Administering full assessments from both the innovative and statewide assessment systems to all students enrolled in participating schools, such</p>	<p>No evidence required.</p>

Regulatory requirement	Required information from the SEA
<p>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 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</p>	<p>No evidence required.</p>

Regulatory requirement	Required information from the SEA
<p>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 LEAs in the innovative assessment demonstration authority. Consistent with the 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;</p>	
<p>(5)(i) Provide for the participation of all students, including children with disabilities and English learners;                      (ii) Be accessible to all students by incorporating the principles of universal design for learning, to the extent practicable, consistent with 34 CFR 200.2(b)(2)(ii); and                      (iii) Provide appropriate accommodations consistent with 34 CFR 200.6(b) and (f)(1)(i) and section 1111(b)(2)(B)(vii) of the Act;</p>	<p>No evidence required.</p>
<p>(6) For purposes of the State accountability system consistent with section 1111(c)(4)(E) of the Act, annually measure in each participating school progress on the Academic Achievement indicator under section 1111(c)(4)(B) of the Act of at least 95 percent of all students, and 95 percent of students in each subgroup of students described in section 1111(c)(2) of the Act, who are required to take such assessments consistent with paragraph (b)(1)(ii) of this section;</p>	<p>No evidence required.</p>
<p>7) Generate an annual summative determination of achievement, using the annual data from the innovative assessment, for each student in a participating school in the demonstration authority that describes--                      (i) The student’s mastery of the challenging State academic standards under section 1111(b)(1) of the Act for the grade in which the student is enrolled;                      or                      (ii) In the case of a student with the most significant cognitive disabilities assessed with an alternate assessment aligned with alternate academic achievement standards under section 1111(b)(1)(E) of the Act, the student’s mastery of those standards;</p>	<p>No evidence required.</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</p>	<p>No evidence required.</p>

Regulatory requirement	Required information from the SEA
<p>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>(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>No evidence required.</p>
<p><b><u>Initial implementation in a subset of LEAs or schools. If the innovative assessment system will initially be administered in a subset of LEAs or schools in a State--</u></b></p> <p>(1) A description of each LEA, and each of its participating schools, that will initially participate, including demographic information and its most recent LEA report card under section 1111(h)(2) of the Act; and</p> <p>(2) An assurance from each participating LEA, for each year that the LEA is participating, that the LEA will comply with all requirements of this section.</p>	<p>No evidence required.</p>
<p><b><u>Application from a consortium of SEAs.</u></b> If an application for the innovative assessment demonstration authority is submitted by a consortium of SEAs--</p> <p>(1) A description of the governance structure of the consortium, including--</p>	<p>Not applicable.</p>

<b>Regulatory requirement</b>	<b>Required information from the SEA</b>
<p>(i) The roles and responsibilities of each member SEA, which may include a description of affiliate members, if applicable, and must include a description of financial responsibilities of member SEAs;</p> <p>(ii) How the member SEAs will manage and, at their discretion, share intellectual property developed by the consortium as a group; and</p> <p>(iii) How the member SEAs will consider requests from SEAs to join or leave the consortium and ensure that changes in membership do not affect the consortium’s ability to implement the innovative assessment demonstration authority consistent with the requirements and selection criteria in this section and 34 CFR 200.106.</p> <p>(2) While the terms of the association with affiliate members are defined by each consortium, consistent with 34 CFR 200.104(b)(1) and paragraph (f)(1)(i) of this section, for an affiliate member to become a full member of the consortium and to use the consortium’s innovative assessment system under the demonstration authority, the consortium must submit a revised application to the Secretary for approval, consistent with the requirements of this section and 34 CFR 200.106 and subject to the limitation under 34 CFR 200.104(d).</p>	
<b>Assurances</b>	No evidence required.

<b>Application selection criteria</b>	<b>Required information from the SEA</b>
<p>(a)(1) The rationale for developing or selecting the particular innovative assessment system to be implemented under the demonstration authority, including--</p> <p>(i) The distinct purpose of each assessment that is part of the innovative assessment system and how the system will advance the design and delivery of large-scale, statewide academic assessments in innovative ways; and</p> <p>(ii) The extent to which the innovative assessment system as a whole will promote high-quality instruction, mastery of challenging State academic standards, and improved student outcomes, including for each subgroup of students described in section 1111(c)(2) of the Act;</p>	<p>LDOE must provide:</p> <ol style="list-style-type: none"> <li>1. Clarification regarding how the interim and summative assessments will yield a total score.</li> <li>2. Explanation of how the assessment will promote high-quality instruction and improved outcomes for subgroups with highly mobile children (e.g., low-income, migrant, homeless).</li> </ol>

<b>Application selection criteria</b>	<b>Required information from the SEA</b>
<p>(a)(2) The plan the SEA or consortium, in consultation with any external partners, if applicable, has to--</p> <p>(i) Develop and use standardized and calibrated tools, rubrics, methods, or other strategies for scoring innovative assessments throughout the demonstration authority period, consistent with relevant nationally recognized professional and technical standards, to ensure inter-rater reliability and comparability of innovative assessment results consistent with 34 CFR part 200.105(b)(4)(ii), which may include evidence of inter-rater reliability; and</p> <p>(ii) Train evaluators to use such strategies, if applicable;</p>	<p>No additional evidence required.</p>
<p>(a)(3) If the system will initially be administered in a subset of schools or LEAs in a State--</p> <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>LDOE must provide:</p> <ol style="list-style-type: none"> <li>1. A projected schedule for the inclusion of additional LEAs into the pilot assessment that includes specific targets/goals for expansion during each year of the demonstration period.</li> <li>2. Information that demonstrates that, at the end of the demonstration period, all LEAs will the same, statewide assessment system.</li> </ol>
<p>(b)(1) The extent and depth of prior experience that the SEA, including</p>	<p>LDOE must provide additional information regarding</p>

<b>Application selection criteria</b>	<b>Required information from the SEA</b>
<p>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> <ul style="list-style-type: none"> <li>(i) The success and track record of efforts to implement innovative assessments or innovative assessment items aligned to the challenging State academic standards under section 1111(b)(1) of the Act in LEAs planning to participate; and</li> <li>(ii) The SEA’s or LEA’s development or use of--               <ul style="list-style-type: none"> <li>(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;</li> <li>(B) Effective and high-quality supports for school staff to implement innovative assessments and innovative assessment items, including professional development; and</li> <li>(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).</li> </ul> </li> </ul>	<p>the extent and depth of prior experience of the SEA and participating LEAs, regarding</p> <ol style="list-style-type: none"> <li>1. The use of effective supports and accommodations.</li> <li>2. The scoring of innovative assessments.</li> </ol>
<p>(b)(2) The extent and depth of SEA, including each SEA in a consortium, and LEA capacity to implement the innovative assessment system considering the availability of technological infrastructure; State and local laws; dedicated and sufficient staff, expertise, and resources; and other relevant factors. An SEA or consortium may also describe how it plans to enhance its capacity by collaborating with external partners that will be participating in or supporting its demonstration authority. In evaluating the extent and depth of capacity, the Secretary considers--</p> <ul style="list-style-type: none"> <li>(i) The SEA’s analysis of how capacity influenced the success of prior</li> </ul>	<p>LDOE must provide a description of the strategies the SEA is using or will use to mitigate risks to the successful implementation of the innovative assessment.</p>

Application selection criteria	Required information from the SEA
<p>efforts to develop and implement innovative assessments or innovative assessment items; and</p> <p>(ii) The strategies the SEA is using, or will use, to mitigate risks, including those identified in its analysis, and support successful implementation of the innovative assessment.</p>	
<p>(b)(3) The extent and depth of State and local support for the application for demonstration authority in each SEA, including each SEA in a consortium, as demonstrated by signatures from the following:</p> <p>(i) Superintendents (or equivalent) of LEAs, including participating LEAs in the first year of the demonstration authority period.</p> <p>(ii) Presidents of local school boards (or equivalent, where applicable), including within participating LEAs in the first year of the demonstration authority.</p> <p>(iii) Local teacher organizations (including labor organizations, where applicable), including within participating LEAs in the first year of the demonstration authority.</p> <p>(iv) Other affected stakeholders, such as parent organizations, civil rights organizations, and business organizations.</p>	<p>No evidence required.</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>LDOE must provide a timeline of the activities that:</p> <ol style="list-style-type: none"> <li>1. Is sufficiently detailed to reasonably demonstrate that the timeline will lead to implementation in high schools in the 2018-19 school year as well as statewide implementation by the end of the demonstration authority period.</li> <li>2. Provides clarity relating to the parties responsible for specific activities.</li> </ol>
<p>(c)(2) The adequacy of the project budget for the duration of the requested demonstration authority period, including Federal, State, local, and non-public sources of funds to support and sustain, as applicable, the activities in</p>	<p>LDOE must provide a projected budget for each year of the demonstration authority period considered in the application that provides detailed information about</p>

<b>Application selection criteria</b>	<b>Required information from the SEA</b>
<p>the timeline under paragraph (c)(1) of this section, including--</p> <p>(i) How the budget will be sufficient to meet the expected costs at each phase of the SEA’s planned expansion of its innovative assessment system; and</p> <p>(ii) The degree to which funding in the project budget is contingent upon future appropriations at the State or local level or additional commitments from non-public sources of funds.</p>	<p>funds needed to develop, administer, score, and report the results of the new assessments.</p>
<p>(d)(1) The extent to which the SEA or consortium has developed, provided, and will continue to provide training to LEA and school staff, including teachers, principals, and other school leaders, that will familiarize them with the innovative assessment system and develop teacher capacity to implement instruction that is informed by the innovative assessment system and its results;</p>	<p>No additional evidence required.</p>
<p>(d)(2) The strategies the SEA or consortium has developed and will use to familiarize students and parents with the innovative assessment system;</p>	<p>LDOE should provide a plan that describes strategies to familiarize students with the innovative assessment system, as well as parents who may not have access to the new website.</p>
<p>(d)(3) The strategies the SEA will use to ensure that all students and each subgroup of students under section 1111(c)(2) of the Act in participating schools receive the support, including appropriate accommodations consistent with 34 CFR part 200.6(b) and (f)(1)(i) and section 1111(b)(2)(B)(vii) of the Act, needed to meet the challenging State academic standards under section 1111(b)(1) of the Act;</p>	<p>No additional evidence needed.</p>
<p>(d)(4) If the system includes assessment items that are locally developed or locally scored, the strategies and safeguards (e.g., test blueprints, item and task specifications, rubrics, scoring tools, documentation of quality control procedures, inter-rater reliability checks, audit plans) the SEA or consortium has developed, or plans to develop, to validly and reliably score such items, including how the strategies engage and support teachers and other staff in designing, developing, implementing, and validly and reliably scoring high-quality assessments; how the safeguards are sufficient to ensure unbiased, objective scoring of assessment items; and how the SEA will use effective</p>	<p>Not applicable.</p>

Application selection criteria	Required information from the SEA
professional development to aid in these efforts.	
(e)(1) The strength of the proposed evaluation of the innovative assessment system included in the application, including whether the evaluation will be conducted by an independent, experienced third party, and the likelihood that the evaluation will sufficiently determine the system’s validity, reliability, and comparability to the statewide assessment system consistent with the requirements of 34 CFR part200.105(b)(4) and (9);	<p>LDOE must provide:</p> <ol style="list-style-type: none"> <li>1. A specific plan to conduct an independent third-party evaluation of the innovative assessment system during the course of the demonstration period.</li> <li>2. Additional information for how LDOE will demonstrate comparability where LEAs are using different versions of the interim assessments.</li> </ol>
<p>(e)(2) The SEA’s or consortium’s plan for continuous improvement of the innovative assessment system, including its process for--</p> <ol style="list-style-type: none"> <li>(i) Using data, feedback, evaluation results, and other information from participating LEAs and schools to make changes to improve the quality of the innovative assessment; and</li> <li>(ii) Evaluating and monitoring implementation of the innovative assessment system in participating LEAs and schools annually.</li> </ol>	<p>LDOE must provide a plan describing its process for using data, feedback, evaluation results, and other information from participating LEAs and schools to make changes to improve the quality of the innovative assessment.</p>