

**Race to the Top Assessment Program
Guidance and Frequently Asked Questions**

*Addendum 3
February 6, 2014*

G. GRANT AWARDS, USES OF FUNDS, PROCUREMENT, AND OTHER PROGRAM REQUIREMENTS

G-7a. Which kinds of costs are associated with the development of assessments and which are associated with the administration of operational assessments?

Program Requirement 8 in the NIA states that grantees are not permitted to use grant funds for the administration of the operational assessments. For the purposes of this program, the Department considers the administration of the operational assessment as the activities related to State, district, and school management of the operational assessment as well as costs associated with student participation and actual reporting. For example, the printing and disseminating of test forms for the operational assessment are part of the administration of the operational assessments, and costs related to these activities could not be paid for with Race to the Top Assessment grant funds. In addition, work to disseminate test administration manuals for the operational assessment and training administrators on those documents would be part of the administration of the operational assessments. The consortia and member states also could not use grant funds for any activities during the actual administration of the operational assessments.

The Department acknowledges that assessment development is iterative and ongoing and will continue through and beyond the point at which the operational assessment is administered to students in the 2014-2015 school year. Accordingly, the development work supporting, but distinct from, the administration of the operational assessments, such as managing the consortium, developing the blueprint and items, assembling test forms, conducting research or other psychometric analyses, developing reporting templates, and building and testing the test platform are development activities and the costs related to them are permissible expenses.

These examples of development and operational administration costs are intended to be illustrative only and not exhaustive.

H. ACCOUNTABILITY, REPORTING, AND OTHER OBLIGATIONS

H-4. Will the grantee be required to provide any student-level data to the Department?

No. The Race to the Top Assessment program does not create any new student-level data collection requirements for any State participating in the grant, and neither the Department nor any other federal agency collects individual student-level assessment data as part of the grant program from any State.

The Department does not collect student-level personally identifiable information (PII) from education records at all outside of its duties that require it, such as administering student loans and grants, conducting surveys, investigating individual complaints, and developing and operating an electronic system for linking State student data systems for migrant children. Otherwise, the Department is not legally authorized to create a national, student-level database (see e.g. section 9531 of the Elementary and Secondary Education Act, as amended (ESEA) (20 U.S.C. 7911) and section 134 of the Higher Education Act of 1965, as amended (HEA) (20 U.S.C. 1015c(a)), and the Department has no desire or intention to create a national student record data system. The Department does encourage, through such initiatives as the Race to the Top Assessment program, the responsible use of data by States and researchers to evaluate and improve education programs, in accordance with all applicable privacy statutes and regulations. More general information on federal statutes, regulations, policy, and guidance related to effective management of student PII is available on the Family Policy Compliance Office website at www.ed.gov/fpco and on the Privacy Technical Assistance Center website at <http://ptac.ed.gov>.

The Department will work with the Race to the Top Assessment grantees to help evaluate their progress during the life of the grant. This includes sharing aggregate research results (but not PII) to evaluate the consortium's progress meeting the absolute priority in the NIA, such as that the assessment system is valid for its intended uses and fairly measures the skills and knowledge of all students, including students with disabilities and English learners.

H-5. What resources does the Department have available to support the grantees and their members States regarding protecting the privacy of student records?

The Department is committed to providing guidance to stakeholders on protecting the privacy of student records maintained by educational agencies and institutions. A few of the guidance documents released include:

- Cloud Computing (June 2012): <http://ptac.ed.gov/sites/default/files/cloud-computing.pdf>
- Data Security:
 - Identity Authentication Best Practices (July 2012): <http://ptac.ed.gov/sites/default/files/authentication.pdf>
 - Data Security and Management Training: Best Practice Considerations (Dec. 2011): <http://ptac.ed.gov/sites/default/files/issue-brief-security-training.pdf>
 - Top Threats to Data Protection (Dec. 2011): <http://ptac.ed.gov/sites/default/files/issue-brief-threats-to-your-data.pdf>
- Guidance for Reasonable Methods and Written Agreements (Nov. 2011): https://www2.ed.gov/policy/gen/guid/fpco/pdf/reasonablemtd_agreement.pdf
- Data Governance
 - Data Governance and Stewardship (Dec. 2011): <http://ptac.ed.gov/sites/default/files/issue-brief-data-governance-and-stewardship.pdf>
 - Data Governance Checklist (Dec. 2011): <https://ptac.ed.gov/sites/default/files/data-governance-checklist.pdf>
 - Data Stewardship: Managing Personally Identifiable Information in Student Education Records (Nov. 2010): <http://nces.ed.gov/pubs2011/2011602.pdf>