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January 10, 2011

Steve Midgley  
Office of Educational Technology  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C 20202-0001

RE: Federal Register Comments

Dear Mr. Midgley:

This letter is in response to the Request for Information (RFI) advertised in the Federal Register regarding assessment. From Florida's viewpoint, it is important that knowledgeable stakeholders participate in the assessment technology standards' process. These stakeholders must understand the specific characteristics of *all* students with disabilities. Having individuals who are knowledgeable in both instruction and assessment participate in the standards' process is how the U.S. Department of Education can "ensure the availability of accommodations based on the individual needs of persons with disabilities" especially within the online testing environment.

The IMS Global Learning Consortium (IMS GLC) has announced the public release of a new set of draft interoperability specifications that will enable states to cooperate on the development and use of electronic assessment items for all students. The Accessible Portable Item Profile (APIP) builds on the Question and Test Interoperability (QTI) and the Access for All Personal Needs and Preferences (AfA PNP) specifications. Florida has been a member of the consortium of eight states that support the development of APIP since 2008. It is hoped that APIP will help improve the assessment environment for special needs students and provide a vendor-neutral platform.

**BAMBI J. LOCKMAN**  
*Chief*

*Bureau of Exceptional Education and Student Services*

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While the APIP provides extensive support for customization to address accessibility needs, it does not support all of the QTI specifications and question types. Therefore, support for Universal Design for Learning (UDL) may in fact be missing. The customization aspects of APIP do provide some choices in presentation of questions but these choices are based on accessibility issues. UDL moves the intent of testing customization into an area that recognizes individual instructional needs and the diversity of cognitive processing between students. There are some QTI specifications and question types not supported by APIP that may be useful in providing UDL testing models. This is an area that needs to be investigated. We do not currently have a research base to guide the appropriate development and customization of test items based on UDL principles.

The National Center and State Collaborative General Supervision Enhancement Grant (NCSC GSEG) and the Dynamic Learning Maps Alternate Assessment System Consortium (DLM GSEG) are working on the development of a comprehensive assessment system to support teachers in improving the learning of students with the most significant cognitive disabilities. Their goal of using UDL principles reinforces the need for the federal government to fund research to guide the use of test items based on UDL testing models that support interoperability.

Metaverse standards are being developed by the IEEE VW (Virtual World) Standard Working Group. It is hoped that these standards will lead to a basic interoperability between virtual worlds (VW), something that does not yet truly exist. There are some systems that support data sharing between VW and learning management systems, such as Second Life and Moodle. The Florida Virtual School has a history class that takes place in a 3D VW environment with in-world testing data recorded in their learning management system. Virtual worlds are being used extensively to simulate various environments and real life events for the purpose of both instruction and assessment. However, as with UDL, we do not have a research base to guide the appropriate development and customization of test items based within a VW learning/testing environment. Given the extent of participation in VW (1009 million accounts Q3 2010, KZero) there is a strong need for research in the use of VW as a testing environment for students as well as a need for standards that address accessibility issues for students with disabilities.

We recognize that choices and customization options are often constrained due to the complexity of providing reliable testing data across all platforms. As mentioned above, several question types from the QTI are not addressed in the APIP, possibly due to the complexity of programming. Addressing UDL and virtual worlds will only increase this complexity and may make implementation more expensive. The identification of what may be considered essential assessment elements and customization features that address accessibility, UDL, and VW issues may be an important first step in the development of comprehensive interoperability standards.

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Resources

APIP Technical Specification

<http://www.imsglobal.org/community/forum/categories.cfm?catid=110&flcache=3634993&entercat=y>

CAST UDL

<http://www.cast.org/udl/index.html>

Dynamic Learning Maps General Supervision Enhancement Grant

<http://dynamiclearningmaps.com/>

Federal Consortium for Virtual Worlds

<http://www.ndu.edu/iCollege/fcvw/index.htm>

IEEE VW

[http://www.metaversestandards.org/index.php?title=Main\\_Page](http://www.metaversestandards.org/index.php?title=Main_Page)

IMS Global Learning Consortium

<http://www.imsglobal.org/>

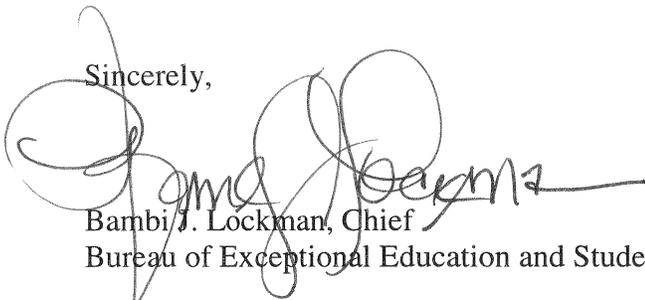
KZero Worldwide

<http://www.kzero.co.uk/index.php>

National Center and State Collaborative General Supervision Enhancement Grant

<http://ici.umn.edu/index.php?projects/view/123>

Sincerely,

A handwritten signature in black ink, appearing to read "Bambi J. Lockman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bambi J. Lockman, Chief  
Bureau of Exceptional Education and Student Services

BJL/cag