

January 18, 2011

The Honorable Arne Duncan  
Secretary  
U. S. Department of Education  
400 Maryland Ave., SW  
Washington, D.C. 20024

**Re: Assessment RFI response from the National School Boards Association (NSBA)**

Dear Secretary Duncan:

The National School Boards Association (NSBA), representing over 95,000 local school board members with and through our state school boards associations, is pleased to offer comments on the Department of Education's Request for Information on Assessment Technology Standards for the Race to the Top Assessment (RTTA) program and other potential uses.

As technology permits differentiation in teaching and learning in every classroom and for every student, assessments will also undergo a transformation. NSBA recognizes the Department's efforts to identify the broad range of issues that assessment technology standards may be called upon to address. NSBA also applauds the Department's recognition of those issues that could impact states and local school districts, such as the need to protect privacy, provide for adaption, facilitate application of assessments to learning and training, and accommodate the learning and assessment needs of every student. Therefore, NSBA's comments are focused on two issues for assessment technology standards: 1) local school district flexibility and 2) universal design for learning (UDL). NSBA urges the Department to integrate local flexibility and UDL principles throughout the process of seeking, identifying, developing and implementing assessment technology standards.

**Local flexibility** – The RFI states that assessment technology standards for the RTTA program may be used as the basis for related standards-based programs, extending the reach of this RFI well beyond the RTTA program itself. NSBA therefore urges the Department to uphold local control and flexibility in any assessment technology standards pursuant to the Background section ("The Department is investigating open technology standards and specifications to support the interoperable delivery...of *State or locally selected content and assessments* for purposes of education and training when conducted via online platforms." (emphasis added). The unique circumstances of each school district require that local instructional decisions and services be supported and enhanced by assessments and technology, not the other way around.

The following sections provide adequate flexibility and therefore NSBA wishes to reinforce that there should be no restrictions or limitations placed upon them:

- 3.2.3 - Processes for adopting, modifying or designing assessment technology standards
- 3.2.5 - Customizing, adapting or enhancing assessment tools for the use of specific learning communities



*Working with and  
Through our State  
Associations, NSBA  
Advocates for Equity  
and Excellence in  
Public Education  
through School  
Board Leadership*

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**Office of Advocacy**

- *Earl C. Rickman, III  
President*
- *Anne L. Bryant  
Executive Director*
- *Michael A. Resnick  
Associate  
Executive Director*

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3.2.12 – Result capture to accurately link individual learners, their assessment results and the systems that delivered instruction and assessments

3.2.19 – Learning and training for the cradle-to-career model from pre-k to post-secondary education and beyond.

3.2.27 – Content and media delivery of instruction and assessments.

**Universal Design for Learning** - NSBA applauds the inclusion of UDL in the RFI as recognition that students have different learning and assessment needs. This is true of all students, not just those with disabilities. We therefore suggest that assessment technology standards have broader application and address accessibility for all students, not just persons with disabilities as currently described in 3.2.28.

Thank you for the opportunity to comment. Questions regarding our recommendations can be directed to Reggie Felton, Director of Federal Relations, at 703-838-6782 or by e-mail [rfelton@nsba.org](mailto:rfelton@nsba.org).

Sincerely,



Michael A. Resnick

Associate Executive Director

MAR: lg/kc

G:Adv/Regulations/2011/01.18.11CommentsonRFIAssessmentStandards