



Race to the Top

High School Course Assessment Programs Technical Review Form



Board Examination Systems Application #BES (b) (6)

(B)(1) Consortium Governance

	Available	Score
(B)(1) Consortium Governance	30	20

(B)(1) Reviewer Comments:

The applicant presents an innovative approach to improve American high school education. A newly created not for profit organization, State Consortium for Board Examination Systems (SCOBES) will lead and conduct the work targeted to the RtT High School Course Assessment Program. SCOBES' vision is formulated around use and adaptation of existing Board Certified Examination Systems to drive improvement and reform at the high school level. The plan that follows, however, lacks convincing substance and details on the part of SCOBES to operationally carry out this vision. To a large extent SCOBES' expected outcomes will be impacted significantly by the level of overall funding it receives. Implementation at the level of \$60 million will place a focus on high need schools and student populations, whereas funding at a reduced amount, will limit significantly the involvement of these individuals and institutions.

The SCOBES plan includes the anchor subjects of reading and math but also extends to other subject areas (e.g. history, arts, career and technical fields and science along with other STEM subjects). In the Project Management section, 8 major deliverables for the project are outlined addressing local level partnership development, research and standard setting procedures, certification and provider selection, assessment implementation, project evaluation, communication with stakeholders, a rigorous STEM program, and upper division Career and Technical Education Programs. High quality professional development is identified as a key feature of the SCOBES TOA as represented by Figure 1-A Overview of SCOBES TOA and Appendix H and as a major milestone in the project work plan. The application, however, does not sufficiently articulate a specific scope of work for this area (e.g. the specific training formats that will be used, content and funding of the training, who will be responsible for the training, etc.)

The Bylaws and Articles of Incorporation for SCOBES articulate the consortium procedures in the area of structure and operations as required by this criterion. Each state in SCOBES is represented by 2 members on the Board of Trustees, one of which must be the chief state school officer who has the option of ceding his/her role to another state officer. The other member is selected through a nominations process which assures the overall membership of the governing board is reasonably representative of major educational, business and policy and community stakeholder groups. Officers and executive committee members are also considered through a nominations process and elected by the Board of Trustees. SCOBES is to be commended for its sensitivity and establishment of specific procedures as part of its governance procedures that build in assurances of diversity. The current Board is primarily populated with members in state roles. The application does not address how involvement of leaders, organizations and staff/faculty from institutions participating in multiple assessment consortia will be handled.

The applicant has developed a set of governance, organizational and operating procedures. There is only one category of voting membership. Any state is eligible to join the consortium and entitled to 2 governing seats subject to the approval of its governor, state board chair and chief state school

officer and a MOU approved by the SCOBES Board. If a state ceases to hold membership in SCOBES, it may be afforded a role as Observer without voting rights. Member responsibilities are delineated by the timeframe associated with when states signed on to SCOBES. The original ten members are required to commit to having 4-10 schools participate in the pilot program and evaluation depending on the overall funding level of the project. Other member states will not be required to identify schools to participate in the evaluation, but will be expected to identify not less than 5 schools for the pilot. Other than the distinctions associated with the piloting and evaluation aspects, all members have the same roles, rights and responsibilities. In their MOUs, all states have committed to making the assessments available statewide no later than 4 years after the pilot provided that evaluation results validate statistically significant student achievement gains. These commitments are judged to represent support at a philosophical level given that the application does not present serious cost proposals for maintaining or expanding the program over time. SCOBES governing procedures will honor a super-majority voting process when called for by three consortium members. This decision making process is also judged to be an important acknowledgement of diversity and will ensure that a variety of viewpoints representative of the governance structure are considered on key policy matters in a thorough manner.

The SCOBES Bylaws address how member states join and can leave SCOBES. Key policies and definitions are addressed in the Memorandum of Understanding and SCOBES Bylaws. SCOBES funds will be managed by NCEE, the Project Management Partner under the direction of the Board's Finance Committee. MOUs submitted by each SCOBES state adhere to a standard format with the exception of the requirements for the number of schools that members must commit to the pilot program and evaluation. The first 10 members will be provided with targeted resources for pilot school participants.

KY will serve as the lead procurement state. The application describes the specific review, management and negotiating responsibilities required of KY. In the cases of ME, VT and NH which do not have cooperating purchasing laws, these states will follow their respective state procurement procedures consistent with the procedures outlined in the application. Assurance regarding the SCOBES procurement process has been validated by signatures from procurement officials in each state.

Recommendations:

- SCOBES should include in its governing or advisory structures representatives from local school districts.
- SCOBES should address how it will coordinate efforts with other assessment consortia if those consortia receive funding.

(B)(2) Theory of Action

	Available	Score
(B)(2) Theory of Action	5	2

(B)(2) Reviewer Comments:

The SCOBES Theory of Action (TOA) is based on its beliefs and research that use and adaptation of existing first class performance based examinations would be the most effective and efficient way to achieve the Rt(T) Assessment intent. The TOA acknowledges that in order to reach its goals there are other elements that must surround the assessments: rigorous performance standards, aligned curriculum and high

quality instructional practice. The TOA appears fundamentally flawed in that it does not make the distinction between the overall purpose of the current Board Examination assessments and the RtTT Assessment intent defined in the NIA as College and Career Ready Standards (CCSR). The SCOBES theory is based on existing examination systems that are complete with assessments and standards-based instructional supports directed largely to college replacement courses, e.g. AP and IB. SCOBES and NCEE will work with higher education institutions to establish the performance standards for the SCOBES' course equivalents which will allow direct access to entry level freshman courses without remediation at two year and four year general admissions colleges. The fact that the application fails to acknowledge the challenges associated with making such distinctions between higher education institutions, suggests a lack of understanding of the complexities of this undertaking.

The assessments will allow multiple pathways to students to access academic study at both upper division and lower division levels, as well as, career/technical degree programs. It is not clear in securing commitments for adaptations of materials the extent to which the existing Examination systems will cover all components as well as adaptations that will be required to ensure alignment with lower division course requirements. The SCOBES theory also places a high priority on the readiness needs of 8th graders and struggling high school students so they will be able to access a rigorous high school curriculum, however, the application provides minimal details on how preparedness needs will be addressed outside of directing targeted fiscal resources to identified schools.

The application attests to the high rigor of the existing current Board Examination assessments based on two major considerations: 1) the Board Examination Systems under consideration are the leaders in defining the international benchmarks used throughout the world and 2) passage of these exams routinely establishes admissions eligibility to the world's top institutions. The application does not provide data to validate or substantiate this claim. Additionally, the application asserts only a general process by which rigor will be established and does not include details, e.g. who will be involved, how curriculum match will be approached, etc.

The assessment program will include the subjects of reading and math but also extend to other subject areas including history, arts, career and technical fields and science along with other STEM subjects. SCOBES expects to have access to the full array of course offerings from the selected and certified providers including subject matter disciplines and interdisciplinary courses. The assessment design and course offerings are expected to include multiple pathways to community college transfer programs, a variety of community and technical college career/technical certificate/degree programs, upper division STEM programs and industry recognized certificates.

SCOBES members have committed to making the program available statewide no later than four years after the pilot takes place based on positive evaluation results. Plans call for a 100 school pilot across 10 states with a priority to include high need students. If funded at the \$66 million price tag, 40% of the pilots will be "high need" schools. The application does not spell out a definition of high need although based on the chart provided in Appendix N it is implied that high need can be interpreted by the categories listed: Free and Reduced Lunch, minority and rural students. This is a strong feature of the SCOBES program but if the level of funding is reduced, one of the application's core strengths --emphasis on equity and access-- will largely disappear with the reduction of pilot schools. This would undoubtedly also impact the credibility of program's purpose and legitimacy. The application does not address the qualitative impact of cutting the program back to an operating level of the core components. SCOBES has also set forth a weakly conceptualized funding proposal for long term maintenance of the program. Thus the ability for the program to reach a scale consistent with the intent defined in the NIA is highly questionable.

Recommendations

- As noted in the section under long term capacity sustainability, more detailed cost analysis must be explored along with vetting of possible finance strategies.

- SCOBES should provide a specific definition for "high need " students

(B)(3) Course Assessment Program Design and Development

	Available	Score
(B)(3) Course Assessment Program Design and Development	60	20

(B)(3) Reviewer Comments:

All providers which have been contacted have agreed to align their offerings to the Common Core Standards. The TAC will oversee an alignment review to ensure the validity in Mathematics and English. It is not clear what specific standards will be used for other subject areas and how comparability will be established across providers. The application does not address how alignment will be established by any external review process for the other subjects.

There are two aspects of rigor that will be addressed: 1) the level of cognitive challenge found in the courses and assessments and, 2) the fidelity of the assessments to the curriculum they are assessing. Results from research along with the standard setting process in collaboration with higher education will be the key determinants attesting to the rigor in the SCOBES program. The rigor determination will be directly tied to SCOBES' lower division exams and based on the initial credit bearing courses of 2-4 year open enrollment institutions. The application does not address rigor in its upper division courses. There was no substantiation of the providers' claims for having evidence of fidelity. It is not clear how fidelity will be demonstrated. The standards for rigor in STEM will incorporate some aspects of the standard setting associated with English and math but also will be ensured by the STEM Task Force. The same will hold true for the Task Force associated efforts involving Career and Technical Education courses.

Appendix K describes the variety of characteristics and features of the assessments offered by potential providers. NCEE has assured there will be sufficient test items to satisfy American reliability requirements. To the extent that the assessments include significant performance requirements, instructional systems need to be in place in the schools. The application does not speak to the processes for establishing test item sufficiency targeted to an expanded student population or the process by which the quality of instructional programs will be monitored.

The application in responding to selection criteria listed under B 3 d i-v relies essentially on information collected from potential Board Examination System providers. A more comprehensive review is needed to judge the quality of what each provider is doing responsive to this selection criterion.

The application asserts that there are a broad range of accommodations offered by the Examination System providers. Three provider candidate systems were described as exemplars of accommodations in the application narrative. Appendix L gives the details of accommodations offerings from 5 potential Board of Examination providers. The accommodations discussion in the application is directed primarily to students with disabilities. The application does not adequately address the accommodation needs for English Language Learners (ELL) students. Reference to the English as a Second Language (ESL) course offering as an ELL accommodations example portrays a substantial lack of understanding of the needs so this important and largely expanding student population in American public schools. The application does not speak to the quality of the accommodations offerings in terms of what is currently available or what is missing. The application does not indicate its intent to address accommodations and a serious way as part of the overall provider certification process. The application also does not speak to how bias and sensitivity reviews will become part of the certifying process.

Extending accessibility to a broad range of students appears as a concept throughout the application, but little is provided in the way of strategies and activities that address the 8th grade preparedness populations or the need for teacher professional development. Without attention to these areas, it is not likely that a broad range of students will be included in proposed program.

Recommendations:

- NCEE should construct a list of accommodations based on evidence based research and representative of its members expectations from examination system providers.
- The SCOBES Board should adopt a policy on accommodations for use in providing guidance to providers.
- The provider certification procedures should incorporate a criterion related to accommodations.

(B)(4) Research and Evaluation

	Available	Score
(B)(4) Research and Evaluation	25	16

(B)(4) Reviewer Comments:

The research plan will be led distinguished leaders in the evaluation/measurement field. The research agenda will be guided by a Technical Advisory Committee (TAC) composed of a diverse group of highly respected experts in the fields of literacy, psychometrics and cognitive science. The TAC membership includes members of diverse backgrounds as well as experience in higher education. The plan is composed of three major components: 1) ensuring that the assessments developed are valid, reliable, and fair for their intended purposes, 2) determining clear alignment between each assessment system and the Common Core Standards, and 3) establishing a researched-based defensible set of performance standards processes for each system including performance descriptors and cut scores.

Together the research and evaluation plan between the 2 budgets presented is estimated to cost from the low range of \$5.4 to \$7.25 million. Some of these funds will support the work of the TAC at both levels. The funding level seems adequate to cover the major components listed but the application does not address the resulting impact associated with one set of decision options versus others based on available resources. The lower level budget would place a limit on the number of standard setting processes that can be conducted. This could have significant bearing on the credibility in the determination of the proposed performance criteria for college readiness. In the area of evaluation expenditures would be impacted by the lesser number of pilot schools. It is also not clear how the research funding allocations described in the application were made within the SCOBES governance structure (e.g fewer standards setting versus not having incentives for evaluation respondents).

In the first research, NCEE staff has already begun collecting relevant materials on the basic descriptive, technical and performance information on the 9th and 10th grade English and Language Arts and Mathematics qualified assessment providers. An external team has been engaged to lead and facilitate the inquiry to validate the specified psychometric properties required under this selection criterion. Once the determination has been made ensuring that Board Examination System providers have met standards of validity, reliability and fairness, recommendations will be channeled through the TAC and SCOBES Board leading to a certification process for providers.

In the second research area, drawing on available best practices, the TAC will conduct a comprehensive and integrated set of comparability studies focused on the correspondence of each exam with its counterparts and the Common Core Standards. A number of providers have committed to adapt their respective systems (assessments and syllabi) and at no cost to SCOBES should the alignment reviews reveal the need for tighter conformance.

The third priority area will focus on the collection of a large body of data to support a clear identification of the specific competencies in English and Math knowledge and skills needed to succeed in 2 and 4 year public higher education institutions. Several studies are included in the research plan to explore these expectations across a broad spectrum of colleges and universities and drawing on various kinds of evidence. The applicant will also develop a methodology to create cut scores for the Move on When Ready Policy. In

discussion of these research undertakings, SCOBES has frankly acknowledged the need for transparency in communicating the different readiness standards by various types of institutions. This concept could create significant challenges which will need to be thoughtfully considered in formulating and communicating messages about the program.

Across the application there is little attention given to potential risks and barriers that might be encountered in the implementation of such a powerful set of new assessment systems. Collection of data in these areas can serve as important feedback for assessment system improvement

The Institute for Social Research at the University of Michigan will lead the evaluation process. The application does not provide information on how the contractor was chosen. The evaluation design will focus on implementation processes and support, program effectiveness, and student performance outcomes. Evaluation will be conducted throughout the 4 year period. In both the base and enhanced studies, there will be parallel collections in treatment and control schools. The sample size will be determined by the level of funding available.

Recommendation

- SCOBES should identify potential risk factors associated with implementation of the Board of Examination System in a deliberative manner and plan to respond to them early on as part of a continuous improvement

(B)(5) Course Assessment Program Implementation

	Available	Score
(B)(5) Course Assessment Program Implementation	45	18

(B)(5) Reviewer Comments:

NCEE has already been meeting with a wide range of stakeholders across member states to explain the aims of the program, answer questions and build support for the work. These meetings are expected to continue. Each chief state school officer has the responsibility, which many have already begun, to recruit key district personnel to statewide meetings so they in turn will solicit schools for the pilot program. To support this effort materials describing the program will be developed that can be shared with districts and schools that have expressed interest in joining the pilot. These materials will be supplemented by materials from the Board Examination System providers. The budget includes funds in the range of \$180,000 to \$530,000 to engage consultants to design and execute an effective communications strategy. Aside from the listing as a budget entry and this brief description, the application presents little specific information regarding its plans to activate resources assigned to communications and outreach. The specific activities required to implement both steps are not sufficiently addressed in the application narrative or budget.

The plan for supporting the program at the local level will come in 2 stages. The first step will involve a pilot involving 40 to 100 schools depending on the level of funding and operational phase. For the pilot activities range from generating agreements from local districts and getting parent buy in to initiating legislative proposals to enable the state to award a performance-based diploma. Appendix M documents the commitments form schools and LEAs to participate in the pilot phase. The second step will be for states based on evaluation results to make a decision about statewide implementation.

A Higher Education Task Force has been established to work with the TAC to make sure that the pass points set for the lower division examinations are acceptable to the higher education community. The Task Force will also work with their higher education colleagues in their states to gain their active support for the program.

No student will be required to participate in the program, but schools will have an incentive to participate, in the form of a subsidy provided by the program for the purchase of the materials and services needed from the Board Examination System providers and the grant if funded at the high level budget.

Summary Tables (B)(5)(a)(i and ii) provide estimates about how the program is expected to grow over the next 5 years state by state and by school.

The primary support for teachers and school administrators will come from approved Board Examination System providers which according to the application already have a wealth of materials available to support their programs. Examples of teacher training offerings extend cover a range from introductory courses to full fledged degree programs on line. Several providers also have available 7th and 8th grade materials that can be develop to support students who come into the 9th grade with a level of literacy and math skills lower than what is required to successfully participate in the lower division rigorous courses. Four designated engagement managers have the responsibility in and with member states to assist in brokering teacher support offerings with assessment providers. There is no plan for SCOBES to monitor or ensure quality of these offerings.

The application does not satisfactorily address professional capacity. The application focuses on a descriptive set of provider products but lacks details for how teachers and school administrators will be supported more strategically based on needs.

Program details such as the following are not included:

- The application does not address key challenges--(e.g. teacher supply, available training time, quality and diversity of provider trainers.
- There does not appear to be any expert external guidance for teacher training or professional development.
- The application gives special attention to high need students but does little to describe a plan and strategy to address these students, their schools or their teachers.
- The budget prioritizes a set of resource expenditures to support pilot schools and struggling students—over \$4.4 million in the high level budget. A definition should be given to define high needs for the purpose of designating specific attributes for classification purposes.
- The application lacks a research and data base to substantiate actual needs in terms of actual populations of students or teachers.
- The application does not extend professional development offerings beyond on line formats

Recommendations for supporting teachers and administrators:

- Develop an operational plan for this area addressing the requirement of this selection criterion, namely, goals, major activities, timelines
- Data should be included in the application to substantiate student needs for support and teachers needs for professional development
- Provide additional details regarding plans to carry out teacher training and professional development related to implementation of the Board Examination Systems, for getting students ready as preparation for the assessments and for helping students to pass the exams at the end of project year 2.
- Conduct an in-depth inventory and analysis should be conducted to evaluate providers PD offerings and their adequacy in addressing SCOBES' member needs.
- An expert advisory structure should be created to advise on the teacher support and high need students strategies.

(B)(6) Project Management

	Available	Score
(B)(6) Project Management	35	20

(B)(6) Reviewer Comments:

The National Center for Education and the Economy (NCEE) has been selected as the Project Management Partner in accordance with the procedures established by KY operating in its role as lead procurement state. NCEE's mission was referenced but not specifically stated in the application. The detailed descriptions provided of projects that have been launched/implemented by NCEE imply a tight alignment with the RttT grant purpose as defined in the NIA. The organization has been in existence since 1987 and is based in Washington, DC. Its track record of success includes design, launch, leadership, and management of several large scale projects involving multiple states: Comprehensive School Reform Quality Center, National Board for Professional Teaching Standards, National Institute for School Leadership, America's Choice School Design Program, New Standards Initiative, and Commission on the Skills of the American Workforce. Staff vitae included in Appendix P describes a highly talented staff with rich and strong experience in project management, standards and assessment. In several components throughout the application, SCOBES demonstrates the importance of diverse representation and various levels of program implementation (i.e. governing board composition and the pilot participation of high need schools), but it is not clear that this principle is operative in NCEE hiring procedures or current staff makeup. Dedicated personnel will include 8.6 FTEs from existing NCEE working on the project for the 4 year period. Staff time commitments are assigned in the range of 60 to 100% time commitments. The NCEE president will spend 75% of his time providing over all direction to the project and oversee in particular the engagement strategy for working with states. While this level of time commitment by NCEE senior executives speaks to the priority of the assessment effort within the NCEE organization, the \$6.7 Million assigned in the budget for NCEE personnel costs is a disproportionate allocation of RttT Assessment resources. Additional personnel functions will be assumed through contractual arrangements.

Summary Table (B)(6)(b): Project Work Plan and Timeline describes key project milestones, deadlines and responsible entities as required by this selection criterion. The milestones are substantiated, for the most part, with strong rationale and detailed action steps described in the narrative sections. Two areas are judged to need substantial elaboration: professional development and communications to constituency groups.

The associated costs for the RttT Assessment Competition application (\$30 million) is part of a larger effort designed to support a comprehensive Board Examination system. NCEE has applied for other grants for the overall effort. Funding from the Gates Foundation (\$4.7 million) and its own reserves (\$1.8 million) has allowed many important start-up activities to move forward. SCOBES has presented 2 budget proposals.

The total for the 1st priority level program plan is calculated at \$66 million including \$30 million which NCEE is hopeful will come from winning one of the USED i3 grants. If NCEE is not successful in winning an i3 award, the program will be reduced by a 50% level of effort. The application speaks to what will be operationally included and excluded in both budget scenarios. It also assures that even at half the costs the core program will not be negatively impacted. The applicant does not substantially describe the qualitative impact of having or not having an extra \$30 million (e.g. exclusion of high need schools, reductions in evaluation funds, less funding for struggling students).

The weakest aspect of the project management plan is the section B 6 d-*Estimated Ongoing Costs to States*. The application outlines a set of philosophical concepts and assumptions focused on cost expectations. MOUs commit states to making the assessment program available statewide no later than the 4 years after the pilot has begun if the evaluation produces positive results from the first level implementation. Letters of support also commit schools and school districts to "purchase the assessments, professional development, scoring services and supports for struggling students." The application fails to provide financial break outs associated with each of these categories of program funding thus making it difficult to interpret what the pledged district and school commitments really mean. The cost of ongoing administration, maintenance and enhancement for the Board Examination program also lacks financial details. The assumptions do not adequately convey the complexities associated with the proposed notions about financial offsets, cost replacements and fiscal dividends and are not accompanied by substantive expenditure projections. Resource availability and disbursement at the state and district levels can also be subject to many political variables and the overall economic climate. The development of the Board Examination system although different in scope and purpose, will proceed concurrently with the development of formative and

summative high school assessments under the auspices of the RttT Comprehensive Assessment Competition. In order to ensure sustainability, more evidence of the fiscal capacity of states and local entities to actually absorb projected costs in real dollars should be provided.

Recommendations

- SCOBES should address how the Project Management hiring practices and current personnel demonstrate assurances of diversity principles similar to those embedded elsewhere in the application.
- SCOBES should expand the description of impact of the \$30 million i3 grant in more qualitative terms (e.g. exclusion of high need schools, reductions in evaluation funds, less funding for struggling students).
- SCOBES should provide a more detailed financial strategy for maintaining and sustaining the first level of operation over time as well as scale up.

Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.

	Available	Score
Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.	10	0

Competitive Reviewer Comments:

SCOBES approach to addressing the competitive STEM priority will be led by Arizona State University a nationally recognized institution for advances in innovative STEM activities and the transformation of public education. The university will enlist and convene on behalf of SCOBES, additional expertise in the STEM fields to design and guide the approach to creating a rigorous upper division curriculum and assessment program. The expert advisors will be comprised of leading STEM academics, augmented by high school teachers of these subjects. The expert teams will go through the course and examination catalogues of the Board Examination System providers and select from each a group of upper division courses that would, in their judgment, constitute a demanding, rigorous and coherent program of study for upper division high school students anticipating a STEM career and preparing themselves for admission to a selective college. The application responds to this selection criterion at a very high level of generality. The application does not describe details regarding specific planning tasks, number of convenings, staff assignments, interim timelines or benchmarks. The applicant envisions a year will be needed to complete this project and come up with a specific plan.

Competitive Preference Priority 2: Focus on Career Readiness and Placement.

	Available	Score
Competitive Preference Priority 2: Focus on Career Readiness and Placement.	10	10

Competitive Reviewer Comments:

The applicant has identified several key partners representing the business community to guide and advise the work in this area: (US Chamber of Commerce Institute for a Competitive Workforce), higher education (American Association of Community Colleges), and career and technical education experts at the state level (the State Directors of Career Technical Education Consortium). Each of these partners has committed

to participating on a Career and Technical Education Task Force (CTETF) to help define the courses of study, reach out to network members, and generate information from the field. The work in this area will follow a 2 step process and will be completed over the course of a 2 year timeframe:

- The CTETF will recommend upper level programs of study (and suggest lower division introductory electives) in the occupational areas identified, based on a thorough review of the best available programs of study that result in industry-recognized, portable credentials
- The CTETF partners and their constituencies will work to promote these new courses and assessment so that college and schools will offer them and employers will employ students who earn certificates

The applicant has responded to this priority throughout the application and has developed a quality conceptual framework for carrying the work forward. It has moved assertively to build partnerships at the outset. Based on NCEE's past work in the area of workforce development, it is uniquely positioned to engage the education and business sectors in developing the courses. If this priority area is funded, a more detailed operational plan will be needed that addresses specific milestone and plan tasks, number of convenings of the advisory group, staff assignments, timelines and benchmarks.

Absolute Priority: High School Course Assessment Programs

	Available	Score
Absolute Priority: High School Course Assessment Programs		No
Absolute Reviewer Comments:		
<p>SCOBES application presents an innovative idea but does not fully address all of the required criteria in the Absolute Priority. The application is substantially underdeveloped in the areas of rigor, scale, accommodations and breadth of student participation.</p> <p>As noted in section B 3, the application does not provide adequate substantiation of the range of accommodations for students with disabilities or ELL learners,</p> <p>As noted in sections B 1 and 2, the breadth of participation of students is subject to available funding levels. To the extent that funding may be limited to only \$30 Million, the participation of high needs schools and students will be substantially reduced.</p> <p>As noted in section B 6, the application does not provide a set of assumptions or cost proposals that would guarantee moving to statewide implementation, scale or sustainment of the program. The ability of the proposed assessments to leverage significant improvements in student achievement outcomes statewide is not substantiated.</p> <p>As noted in section B 3, the procedure by which rigor will be validated will largely be dependent on the standard setting process led by the Technical Advisory Committee and involving higher education representatives to set performance criteria for college readiness in mathematics and English literacy. The quality of this process will be impacted by the level of funding. At this point, the procedure for establishing rigor has not been sufficiently articulated in terms of specific content. The application does not address rigor in its upper division courses.</p>		
Grand Total	220	106

Budgets

Level 1 Budget

Name: Level 1 Budget(s)

The budget is presented at two funding levels and awaits decision from the i3 awards process to determine more specifically the level of resource allocation within each budget category. In the level 2 budget presentation there is a specific indication of what will stay or go based on how much money NCEE and SCOBES can raise. Except for the personnel details most of the contractual descriptions are presented at a general conceptual level. There is also a set aside of \$4.4 million to go directly to the local school district level in support of struggling students. Additional details and specs should be provided to address how the 3 sub categories of funding will be distributed and used for struggling and high need students.



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Board Examination Systems Application #BES (b)
(6)

(B)(1) Consortium Governance

	Available	Score
(B)(1) Consortium Governance	30	26
<p>(B)(1) Reviewer Comments:</p> <p>The opening two paragraphs of the Executive Summary signal a thoughtful proposal and a robust view of the place of assessments in schools. That thoughtfulness is carried out in its governance vision and structure.</p> <p>(a) The explicit ties among curriculum, instruction, and assessment is proper and well-developed in the proposal. The technical advisory panel is composed of persons who not only have technical expertise but also have experience with broad questions associated with assessment systems. This is potentially a very powerful combination.</p> <p>(b) This proposal deals with a small number of states making it easy to coordinate the effort. What is expected of states is well-defined, so the governance should proceed rather directly.</p> <p>(c) The Memoranda of Understanding are well-written and thorough. States are asked to commit to a set of purposes and goals directly tied to the notice.</p> <p>Recommendation: Although the full proposal is technically sophisticated, indicating one assumes major consultation with the technical group, the National Assessment Governing Board (NAGB) structure should be considered. The proposed board could be augmented to include those additional interests, especially technical ones. Rather than have narrow representation on the board, it is desirable to have various shareholders at the table.</p>		

(B)(2) Theory of Action

	Available	Score
(B)(2) Theory of Action	5	4
<p>(B)(2) Reviewer Comments:</p> <p>(a) The proposal gives a detailed response to this requirement. Among the strengths of the response is the notion of defining the levels of experience and success students need to be successful "in the initial credit-bearing courses in the nation's two-year and four-year open-admissions ... institutions." This is a crucial distinction as it minimizes the differences among institutions eliminating the impossible task of creating one cut-point to serve both the most selective and most open institutions. This may make it feasible to develop a defensible "pass point."</p> <p>(b) By allowing students to take the lower division examinations as often as they wish, the proposal builds in a formative dimension for the students where they can be given proper feedback and corrective experiences.</p>		

(c) The clever choice of working with existing providers makes it possible to provide the desired diversity of courses. The diversity of providers also creates an opportunity for new courses to be developed by those who have had experience with other courses related to college preparation.

(d) Since most evaluations of large scale projects find more variation within a particular "treatment" than between treatments, it is desirable to attempt to understand both. In order to look both within and between "treatments" it is necessary and desirable to differentiate among courses and providers. Increased access to rigorous courses, for example, may be differentially provided. Hence, there is an opportunity to look closely at what works.

(B)(3) Course Assessment Program Design and Development

	Available	Score
(B)(3) Course Assessment Program Design and Development	60	55

(B)(3) Reviewer Comments:

The proposal shines in its discussion of assessment in general and assessment programs in particular. A particular strength is having diverse providers who should increase the possibility of wide-scale adoption.

(a) There is an array of courses and a strong rationale for the "core" that is proposed. By implementing courses at a "higher" or "lower" level there is an opportunity to engage academically students who typically have not been engaged in the existing high school scene. Providers who see gaps in the curricular offerings will be free to create new courses and assessments.

(b) Common standards exist for mathematics, language and science, and the proposal relies on them. In the content areas of the proposal that do not have common standards mechanisms to make the courses "standards based" are put in place. Of particular interest is the work on STEM issues.

(c) The proposal rightly puts ascertaining whether or not curricular experiences are common ahead of the nature of the assessment. In doing so, changes in curricular matters can be reflected in updated assessments.

(d) (i) Appendix K contains a description of possible providers and their approaches to courses and assessments. As one could imagine, there is a great deal of variety among providers. It appears, however, that most providers link curriculum, instruction and assessment in coherent ways. The type of assessments depends on both the course and the provider.

(d) (iii)The discussion of issues surrounding the measurements of growth and their use is well-informed. It discusses one by one various alternatives to measuring growth and discusses the strengths and weaknesses of each approach. Members of the TAC have extensive experience in these matters and would be expected to give good advice and direction.

Recommendation: It would have been desirable to be more precise about how comparability of standards across content areas might be judged and maintained.

(B)(4) Research and Evaluation

	Available	Score
(B)(4) Research and Evaluation	25	21

(B)(4) Reviewer Comments:

The technical advisory panel is quite good and surely capable of overseeing a robust set of studies to determine the properties of the assessment results.

(a) This discussion of varied traditions in testing provides a basis for extracting the most promising approaches from among the diverse practices. The proposal is correct to say that making comparisons among courses, assessments and standards should go beyond the work of Webb or Porter. The suggestion to examine the content and demands of introductory courses in open-admission institutions is imaginative and potentially very useful. It will provide the criteria for what "ready" means.

The overall discussion of cut-scores, the emphasis on empirical results and the collection of an array data for the open-admission schools provides a feasible way to establish proficiency standards.

(b) The evaluation plan is ambitious and focuses on the notice's requirements. A focus on program differences is important in order to understand why one provider's system seems to work while another one's may not. Looking at difference or effects within program types is alluded to but not explicitly discussed. Major evaluations show that there are larger differences within treatments than between them, so it is essential to look for differences within the various provider's initiatives.

Potential studies are defined with enough specificity so it is possible to link the studies to the set of questions that should be answered about the intervention. The coherence between evaluation approach and major questions is a desirable feature of the proposal. Consistency is important in these matters.

Recommendation: A strong evaluation would track and attempt to explain within program variation as well as between program variation.

Recommendation: An evaluation should attempt to document all effects not just intended ones. Often the most powerful effects were unintended. "Side effects," as Scriven says, "are often the main event."

(B)(5) Course Assessment Program Implementation

	Available	Score
(B)(5) Course Assessment Program Implementation	45	40

(B)(5) Reviewer Comments:

(a) (i) (ii) (iii) The summary tables give details of participation by course and year for each of the participating states. The projections in terms of sample size are based on the premise of additional funding through an i3 grant. The pilot and operational activities can proceed without the additional support but with a smaller sample (and less power to detect differences between and among programs).

It is difficult to make predictions about how participation in the assessments will grow over time. There are assumptions about growth in the tables. One assumption is that about 1/2 again as many (10,15,23) will participate in each subsequent year. How good the projections are depend on the validity of the assumptions.

Much of the promotion work is expected to be done by the states. Successful implementation of this program would be the best thing that could happen to promotional efforts.

(b) This proposal is very well thought-out. The section on supporting teachers and administrators is again exemplary. For example, the idea of four Engagement Managers to shepherd the training is good as it is a way to insure that proper attention is given to the support and training of educators. Because the plan depends on providers to enhance capacity, proper management is essential. That is where the engagement managers will be most useful.

(B)(6) Project Management

	Available	Score
(B)(6) Project Management	35	26
<p>(B)(6) Reviewer Comments:</p> <p>There appears to have been a good deal of prior preparation in terms of organization and management for this proposal. Work has been done so that persons and tasks have been identified and should be able "to hit the ground running."</p> <p>(a) Because part of this proposal is in place and apparently has been well -managed there is evidence to suggest that this initiative will be well-managed. The technical advisory group is particularly strong.</p> <p>(b) The timeline is detailed and logically. The timeline may be a bit optimistic. For example, both evaluating the board exam in relation to CCSS and judging comparability among the exams is to be completed in just two months.</p> <p>(c) Completing all of the tasks with the number of schools as described in the proposal is possible only with additional i3 budgeting. The proposal is up front with that information. Because of that, the proposal offers two budgets under two different scenarios. The budgets would appear to provide sufficient staffing and resources to accomplish the tasks outlined by the proposal. The budgets appear to allocate too much to management personnel.</p> <p>(d) The proposal acknowledges the difficulty of providing estimates of state costs. It makes the strong assumption that continuing costs will be minimized by the early exit of students from secondary school to attend college. There is no empirical data to substantiate the claim. It would seem that costs are being shifted rather than saved. Also, funding for secondary schools could decrease because of a decrease in enrollments. If so that would be a disincentive for schools to participate in the program.</p>		

Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.

	Available	Score
Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.	10	10
<p>Competitive Reviewer Comments:</p> <p>STEM is discussed through the proposal. A group to focus on STEM requirements and activities will be formed. So, the proposal is responsive in general to these criteria.</p> <p>(a) Because of the coherence of the proposed program, the response to this charge is short. The core activities are defined well in the proposal and provide a foundation for STEM activities. Much of this work has been completed since the initiative depends, in part, on what providers already do.</p> <p>(b) There is a special group organized to respond to this charge. Their work will determine which providers or combination of providers are able to produce the desired rigorous course of study.</p> <p>(c) It is unclear how higher education institutions other than Arizona State will be involved in the development of courses and/or assessments for the STEM courses.</p>		

Competitive Preference Priority 2: Focus on Career Readiness and Placement.

	Available	Score
Competitive Preference Priority 2: Focus on Career Readiness and Placement.	10	10
Competitive Reviewer Comments:		
<p>A strength of the proposal is that it deals with the issue of career readiness throughout.</p> <p>(a) The response focuses on the process for producing the courses rather than the courses themselves. It has a logical framework for producing useful courses and experiences for students. Again providers are a crucial part of the initiative.</p> <p>(b) The upper tier courses, as described in the proposal, are quite likely to be demanding. It is proper that the accompanying assessments focus on performance.</p> <p>(c) There is ample opportunity for participation and support from the business community. The proposal includes a commitment from three national partners that represent the business community thereby providing a means to get the desired participation.</p>		

Absolute Priority: High School Course Assessment Programs

	Available	Score
Absolute Priority: High School Course Assessment Programs		Yes
Absolute Reviewer Comments:		
<p>This is a well-developed, well thought out proposal. It has important implications for the structure of secondary education in the United States and equally important implications for students. By providing pathways to careers and higher education for students as early as after the 2nd year of high school, the initiative changes what a high school education is and how it is related to further additional educational experiences.</p> <p>(a) (i) (ii) The proposal goes beyond these specifications by providing a core curriculum that includes more than mathematics, language and science. Because it does so, it can align experiences to the existing standards in those three areas but must develop them in the additional ones. It has a set of procedures designed to do the latter.</p> <p>Through the providers courses the proposal provides a variety of assessment procedures that include performance assessments as well as more routine measurements.</p> <p>(a) (iii) The proposal contains a very good description of the possibilities (and limitations) of a variety of growth measures. How those measures might be used to determine teacher or school effectiveness and the pitfalls of such approaches are addressed.</p> <p>Through out the proposal there are initiatives for training educators at all levels. It includes also evaluation procedures that should identify improvement and describe the procedures that were used to produce the improvement.</p> <p>(a) (iv) It proposes getting relevant information about students prior to their entering the core curriculum. Adjustments can be made before the program as well as during it. Allowing students to retake the lower level examinations is a way to make the test more accessible. Accommodations for the assessments will be available.</p> <p>(b) The curricula as intended are impressive, should engage more students, and produce a greater yield (the sum of skills and knowledge) from our educational system.</p>		

(c) The proposal provides a process for certifying the rigor of each assessment. Because there is a menu of provider courses, it will be possible to compare and contrast assessment procedures and classify them according to how rigorous they are. This process of ascertaining rigor should be easily applied to common expectations for rigor as called for in the notice.

Grand Total	220	192
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Budgets

Level 1 Budget

Name: Level 1 Budget(s)

The budget seems adequate with the possible exceptions of higher than expected salaries for those on the management team.



Race to the Top

High School Course Assessment Programs Technical Review Form



Board Examination Systems Application #BES (b)(6)

(B)(1) Consortium Governance

	Available	Score
(B)(1) Consortium Governance	30	15

(B)(1) Reviewer Comments:

As conceptualized, the SCOBES plan will focus primarily on adaptation and implementation of preexisting Board Examination Systems rather than more broadly on design, development, and implementation of a new high school course assessment program.

The subsection on the consortium's vision, goals, role, and key deliverables is overly general in terms of content. However, the roster of Technical Advisory Committee members (Appendix C) does support SCOBES' claim that their TAC is composed of some of the worlds leading research scientists, psychometricians, and literacy experts.

Subsection b (including the appendices D, E, and F referenced in this subsection) is somewhat richer in supporting detail, although thin on information regarding key policies and definitions to which all member States will adhere and the consortium's plan for managing funds. This subsection includes clarification that there is only one role a member state may hold—that of Governing State—but indicates the opportunity for states wishing to observe the work of the Board to send observers to meetings. The Summary Table for this section clearly sets forth Governing Member states' rights and responsibilities. It was helpful to have some clarification in that table of the participation requirement for states other than the first ten to join the Consortium.

This subsection also outlines the Board's decision-making mechanisms (simple majority vote on most matters and a supermajority vote on "matters particularly important to some members"). It is not clear how this provision addresses the potentially limited capacity of representatives of the member states to "make policies on all education matters for their states." There is no clear distinction made between policy decisions and operational decisions. Some detail is provided to address the protocols by which the consortium will operate.

The terms and conditions of the Memoranda of Understanding, as presented in subsection c, are somewhat confusing. Reiterating that only the ten original members must commit to participating in the pilot at the full level (at least 10 high schools) while additional members do not (needing instead only to identify a minimum of 5 high schools to participate), this section does not make clear why the additional members are excused from participation in the evaluation or explain and defend the meaningfulness of their piloting without such participation. As written, it appears that funding drives this determination.

The procurement process is clearly described, including a step-by-step purchasing plan by means of which organizations can become certified providers of Board Examination Systems from which member States can select and purchase. MOUs reveal that all member States have made a commitment to the consortium's procurement process.

Given its strengths and weaknesses, this response scored in the medium range.

Suggestions to the DOE:

The requirement that at least 10 high schools participate (4 of which must serve mainly high-need students) seems as if it has the potential to be insufficient to obtain solid data. Particularly in states with very large student populations, this requirement might truly represent a mere “drop in the bucket.” A better alternative might be to require that member states commit the number of high schools the student populations of which represented a certain percentage of total students in that state. According to the Summary Table for (B)(5), ten high schools represents over 13% of high schools in Rhode Island (the smallest member state) but less than 1% of those in the largest member state, New York.

(B)(2) Theory of Action

	Available	Score
(B)(2) Theory of Action	5	3

(B)(2) Reviewer Comments:

The system that SCOBES proposes is built upon existing Board Examination Systems that include syllabi, instructional materials, supporting teacher training, and a battery of exams. SCOBES’ theory of action is presented in graphic form, supported by a detailed commentary in Appendix H. The graphic makes clear that central to the SCOBES plan is what they have coined a “Move-On-When-Ready” system, whereby students can progress at their own rate and be assured of customized support as weakness/obstacles to success become evident. The narrative for this section of the proposal provides some elaboration intended to address criteria a through d.

The extent to which the applicant’s theory of action is logical and credible is diminished somewhat by unsupported claims and propositions intended as explication (e.g., that students often fail because they and their teachers have only vague ideas of what quality work looks like, that their curriculum is often not aligned with standards, that they do poorly in high school because access to community college or open admissions institutions reduces incentive). Questionable assertions and generalizations characterize Appendix I as well. It is no longer accurate to assert, for example, that “high school exit exams are often minimum competency tests built up from standardized item banks that are only loosely aligned to high school curricula.”

In this same appendix, the applicants offer “a large body of research” on the impact of CBEEE (curriculum-based external exit exam) systems. The evidence gathered is useful in demonstrating the positive effects of CBEEEs on students’ academic achievement.

Overall, the proposal content that addresses what the applicants’ claim is the current, problematic state of affairs threatens to overshadow their explanation of how the proposed assessment program will be incorporated into a coherent high school educational system. Assertions are made about the proposed system without any elaboration of “such as,” “how,” or “why” (e.g., which assessment techniques are included in the “range” offered, what kinds of instructional support will be provided to teachers and students, what makes these “much more valid for assessing higher order skills and knowledge”).

The applicant’s theory of action describes a core curriculum as well as an optional core to be identified by the STEM task force and a program of study defined by the Career and Technical Education Task Force, but it is very general regarding course offerings. The applicant presents an early exit plan option that would enable students to qualify for entrance to public open admissions colleges after sophomore year or continue preparing for acceptance to a selective college after senior year. It is curious that SCOBES seems to indirectly disparage open admissions institutions by asserting that they are a haven for students with little/no motivation who only need first to get D grades to pass their courses, and graduate high school, and yet recommends that whatever skills/knowledge are required in the initial credit-bearing course in the nation’s two and four year open admissions postsecondary institutions be used to establish the mathematics and ELA literacy levels needed to exit high school and enter those institutions without preliminary remediation. One may question whether this is consistent with the system’s purported rigor.

Based on these observations, the response received a score in the medium range.

Suggestions to DOE:

Although the references cited in Appendix I are certainly helpful in supporting SCOBES' theory of action, more diverse authorship and representation of perspectives besides economics would have enhanced the usefulness of this information, and the Department might wish to ask for some additional references.

(B)(3) Course Assessment Program Design and Development

	Available	Score
(B)(3) Course Assessment Program Design and Development	60	18

(B)(3) Reviewer Comments:

The applicant's proposed high school assessment program is consistent with their theory of action. Key observations and concerns based on this section of the application are as follows:

In subsection (a) of their response, SCOBES briefly describes two examples of core programs associated with a Board Examination System, The International Baccalaureate Diploma Program and the Pearson/Edexcel International General Certificate of Secondary Education Program (based on the English General Certificate of Secondary Education courses and examinations). Although SCOBES indicates that this latter provider, as well as others, is prepared to modify and adapt their courses and examinations as necessary to meet American requirements, it does not provide adequate detail and supporting evidence. Such modification would very likely require a significant financial investment (as well as a huge commitment of human capital). Furthermore, although SCOBES indicates that "adaptations will be made at the expense of the providers," the absence of a written commitment from any of the Board Examination System providers to do so raises some concern.

Furthermore, the applicant indicates that none of the adapted courses will fall into the public domain, which implies that literally no new courses will need to be created. This would appear to place a limitation on curriculum and instruction tailored to an American audience. Treatment of the processes by which existing course assessments will be updated and refreshed over time is missing from this subsection of the narrative, and it also fails to address the need to increase access to rigorous courses (something that was addressed in the applicant's theory of action).

Assurances continue in subsection (b) of the response, specifically the commitment to align their offerings with the CCSS. There is no written documentation included with the SCOBES proposal to verify this commitment nor is there any information included to clarify at what point this would take place (e.g., as a precondition for certification or only after the fact).

The proposal fails to address the scope of exams which will need to be subjected to alignment reviews, based on the comprehensive nature of the standards in ELA in particular (reading/writing in the content areas, other genres, speaking and listening, etc.). There is nothing included in the proposal to instill confidence that "modification" will be sufficient to bring course offerings into alignment—rather than the need to create essentially new courses (which the proposal explicitly states will not take place).

The applicant's account of how the consortium will certify the rigor of each assessment in the assessment program is overly general, and includes as support references to statements about various programs' "world class" status made earlier in this portion of the narrative. Again, references to "what we are doing" and "work underway" seem intended as evidence, without any supporting detail.

Particularly given the applicant's pride in work being done to determine the demands of the nation's open admissions post-secondary institutions in order to set pass points for the lower division (which would permit exit from high school directly into one of those institutions), it is troubling that there is no mention of the need for, or desirability of, a review of those very "requirements of success in our nation's open admissions postsecondary institutions." Alignment without validation seems empty.

In subsection (d), the applicant refers readers to Appendix K to see "a comprehensive matrix displaying the characteristics and features of a representative list of Board Examination Systems." This appendix contained some interesting and useful information about each of several prospective providers' programs in format that aided comparison; however consulting the appendix led to some disappointment, since there is no specific information on the number and type of components or evidence that assessment items will be varied.

The narrative does not demonstrate substantial working knowledge of item and task types that may contribute to an assessment of what students have learned and can do, although it is likely that those in the Consortium who will be working most closely on the proposed course assessment system are both experienced and well informed in that regard. In the proposal, terms like "constructed responses of other sorts" are never supported with specific examples of item types, and claims for the commitment to performance assessment among potential providers are not well substantiated.

The applicant's remarks about the production of student achievement and growth data suggest a "retrofitting" of the types of data typically reported under the various Board Examination Systems to the needs suggested by the NIA. The applicants speak of "grades" and "subscores aligned with the topics or other major sub-divisions of the curriculum," demonstrating an apparent confusion between curricular modules and standards/strands. While SCOBES' inclusion of customized support and remediation for students demonstrating weaknesses is commendable, it is not at all clear what data will be derived from their system that lends itself to the level of discrimination necessary to truly inform a remediation plan. There is no disputing that the various Board Examination Systems being considered are of high quality and are valid and reliable for the purposes for which they were designed. However, as written, SCOBES does not adequately address how validity and reliability will be assured for this new application of these systems--determination of college and career readiness as defined in the NIA--for a considerably different cadre of students than those originally intended.

The tentative stance that SCOBES takes on provision of growth measures is manifest in the language of the narrative: "a good chance," "might work for this purpose," and "it is at least possible" raise red flags.

There is disappointingly little attention given in this proposal to anticipated means of ensuring scalable, accurate, and consistent scoring of assessments. Assurances are given once again in this regard that the potential providers are "associated with the most admired organizations in the world," and the need for detail is dismissed due to insufficient space to address methods and procedures for addressing technical challenges. Scoring—and specifically the extent to which teachers are trained and involved in scoring of assessments—is treated in a cursory manner, with no attention given to the issues and implications of teachers scoring their own students' exams (i.e., no reference to distributed scoring).

Finally, the applicant's explanation of how the course assessments will be accessible to the broadest range of students, including English learners and those with disabilities, is incomplete. A few accommodations routinely offered by a few of the potential providers are noted in extremely general terms, and address only the needs of students with disabilities. References to "English as a Second Language" courses in the narrative and in Appendix L suggest a lack of familiarity with/understanding of accommodations that might be appropriate for students who are English language learners.

For these reasons, supported by the specific observations and concerns above, this response was assigned a score in the very low "medium" range.

Suggestions for the DOE:

The applicant indicates that their Technical Advisory Board (an impressive team of experts in curriculum, instruction, and assessment) has already begun various activities (e.g., the development of a "demanding review process" to determine alignment of English and mathematics exams to the CCSS). It would be useful to learn more about what actual progress towards this end has been made, under the aegis of what group(s) or funding source(s). The Department should consider the advisability of these criteria resting in the hands of a single committee, albeit a strong one.

Before moving forward using a pass point set in relation to current standards and expectations of open admissions institutions, it would probably be wise to carefully evaluate those standards and expectations.

(B)(4) Research and Evaluation

	Available	Score
(B)(4) Research and Evaluation	25	15

(B)(4) Reviewer Comments:

SCOBES' three central research objectives are clearly established at the outset of Part a (Research Plan) in this section of the proposal, and a stellar team who will provide oversight is identified. The text that follows returns to each of the three objectives and provides elaboration.

"Assuring that all of the assessments meet prevailing professional standards for fairness, reliability and validity"

The applicant returns to a strategy employed earlier in the proposal, of setting up comparisons between "the American testing system" and the English. This oversimplifies and even falsifies strategies and objectives (e.g., implying that the assessment of higher order thinking skills requires essay format). Unfounded claims take the place of clear and direct attention to the ways the Board Examination Systems address standards for fairness, reliability, and validity. While noting that a determination will be made of the extent to which lower division providers' systems are fair, reliable, and valid, and reported to the TAC, which will then decide whether the Board's standards have been met, the proposal never addresses what the Board's standards are (if they have already been formulated) or how they will be formulated in a timely manner to inform this proposed review. Furthermore, there is no mention of any evaluation of the fairness, reliability, or validity of upper division assessment instruments.

Few if any would argue about the technical quality of the Board Examination Systems for the purposes and audiences for which they were originally intended and as they are currently used. These would be used differently under the applicant's plan, however, yet there is insufficient evidence that these assessments would be suitable for all students.

Of particular concern is omission of any reference to bias and sensitivity review, a component of assessment development and review that is standard for all high-quality instruments. While the various Board Examination Systems may have been subject to scrutiny in that regard, depending on country of origin, these assessments could very well contain items/tasks with inherent cultural or other biases of specific concern, which would be identified by professionals who are typically called upon for this type of review.

"Determining that each of the lower division Board Examination Systems are compatible with the new Common Core State Standards and comparable each with the others"

SCOBES appears to be using "compatible" as a synonym for aligned (as suggested, for example, by their referencing alignment approaches of Webb and Porter). It is not at all clear how applicable the experience of England is towards this end (in spite of citing the 200-year history of England's leading universities in "comparing the curricula, exams, and scoring systems they developed"). This may have ensured alignment of curricula and assessments, but does not seem a model for examining alignment of CCSS and various assessment systems.

"Establishing a defensible and empirically supported set of performance criteria for college readiness in mathematics and English literacy, and then setting cut scores for each examination relative to these criteria"

The applicant's plan to establish a cut score for their "Move-On-When-Ready" policy based solely on what constitutes satisfactory performance in introductory level courses in English and mathematics at open enrollment two and four-year institutions of higher learning is questionable, although it supports their idea of

an early gateway from high school to community college (or the equivalent). The proposed empirical studies of the content and cognitive demands of introductory-level courses make sense, and that endeavor is certainly of merit; however, it would seem perhaps appropriate to also examine and factor in the level and types of performance expected at somewhat selective IHEs. It would certainly be more consistent with the uses of Board Examination Systems among the nations admired by the applicant for their superior performance (nations that do not have the extensive network of open enrollment IHEs that exists in the US).

SCOBES plans to have a very credible organization, the University of Michigan's Institute for Social Research, conduct the independent evaluation for this grant. Three research questions are identified that will inform the evaluation. These, if fully and appropriately addressed, should satisfactorily determine whether the assessments are being implemented as designed and the theory of action is being realized (including whether the intended effects on students and schools are being achieved).

In the section on Course Assessment Program Implementation, the applicant claims that the total of 40 participating schools (in the event that SCOBES fails to receive an i3 grant) will be sufficient to conduct the research and evaluation proposed. This claim is not supported in any way and may indeed be overly optimistic.

Due to the unevenness of this section in terms of the extent to which the applicant's research and evaluation plan is likely to ensure that the assessment components of the systems utilized are valid, reliable, and fair for their intended purposes and for all students, this section received a score in the medium range.

(B)(5) Course Assessment Program Implementation

	Available	Score
(B)(5) Course Assessment Program Implementation	45	18

(B)(5) Reviewer Comments:

The applicant outlines two stages in their plans for implementing the proposed assessment program: the pilot stage and operational stage.

Although in some respects the stage is apparently already set for initiating the pilot stage of the program (especially in terms of the support already garnered from 80 LEAs), there remains much to be done before piloting can commence, most particularly soliciting participating schools and students within those schools. Although the applicant specifies the number of schools that will participate at the pilot stage (with and without funding from the i3 grant to supplement this grant), it is not clear how many students are likely to be involved (or need to be) since no students will be required to participate in the program. This would appear to potentially have a huge impact on the ability to conduct research that can inform the next stage of implementation.

Implementation plans in this section of the proposal were not well represented among the tasks and benchmarks laid out in the timeline included (Appendix R). With so many activities requiring completion before even pilot implementation can begin (most especially the certification of various Board Examination Systems after, and only on the basis of, alignment studies, plus other activities including adapting curricula, instructional resources, professional development resources, and assessments as necessary AND completing the competitive procurement process outlined elsewhere in this proposal), it is not at all clear that the work described as part of the pilot stage can begin at the proposed time (June 2011 according to Appendix R).

There is little detail (other than a reference to a subsidy for the purchase of materials and services from Board Examination System providers) to indicate the approaches member States plan to take to promote participation by schools, teachers, and students, and no delineation of goals, major activities, timelines, and entities responsible for execution of those approaches/plans. The proposal outlines in very general terms

getting districts and high schools to agree to demonstrate use of the Board Examination Systems and assessments and persuading parents and students to sign up for the program; however, it includes no suggested strategies for promoting participation at the student level, merely suggesting that the ability to "move on when ready" will be inducement enough.

At the second, or operational, stage, the intention is for programs to go statewide in those states where the pilot took place and then go statewide elsewhere (in additional states that join the Consortium over the next several years).

Neither the summary tables nor the narrative that precedes them provide any basis for the many assumptions being made, from the rate of expansion of school sites over time to the rate of student participation. Therefore, it is difficult to evaluate the credibility of what SCOBES considers "a conservative set of estimates." This applies to figures on the number and percent of high schools expected to implement at least one of the assessments in each of the five consecutive years beginning with 2013-2014; and the number and percentage of high schools expected to implement each assessment.

At issue, given the many assumptions being made, is whether the projections are practical and achievable. Just one example is the expectation that in each participating state a "full suite of courses (English, mathematics, the sciences, history, and the arts) will be operating from the outset." This would necessitate a level/scope of professional development that there is no evidence school/system budgets can accommodate. With week-long training at a cost of 1,600 per teacher for only one of the systems being proposed (ACT/Quality Core), even without any details about approximate number of teachers who will need to be trained one can anticipate that this may amount to an enormous hidden cost. Furthermore, adjustments downward of the estimated number of students taking exams each year due to the number leaving after sophomore or junior year for open enrollment colleges must be considered in light of the fact that at present, the majority of college students nationwide enter selective IHEs, not open enrollment community colleges—which suggests that even with satisfactory performance on lower level Board Examinations the majority of high school students who are college bound will still remain in high school to prepare for admission to selective colleges and universities rather than leave to attend open enrollment institutions. Beyond the cost projection in Appendix O, more detail and evidence of the analyses that led to the optimistic projection of financial dividends reaped because of the new system is warranted. The 30% move-on rate is offered without explanation, and does not account for any shift in the percentage of high school students who may well elect to wait to apply to a more competitive institution, especially if one impact (as anticipated) of implementing a world-class Board Examination System is to improve student learning and performance, making more students competitive and eligible to apply to—and be accepted to—selective colleges.

The plan for supporting teachers relies primarily on the Board Examination System providers themselves. One example provided (an unspecified English organization that offers Board Examinations) suggests that the primary focus of their training is implementation of their courses. The second example, ACT/ACI, is described as offering training and technical assistance "tied to degree to which students fall short of the level of literacy they need to profit from their on-grade instruction." However, it is not clear whether this assistance will help build teachers' professional capacity to use the assessments to inform and improve instructional practice. The provision of materials that can be used to create customized programs for students does not—in and of itself—lead to growth among teachers and/or administrators.

The applicants briefly allude to the possibility of the Board Examination System providers assisting state schools of education in offering pre- and in-service instruction on utilizing their systems. This is an engaging idea that could use further development.

Overall, based on strengths and weaknesses of this response, it received a score in the low "medium" range.

(B)(6) Project Management

	Available	Score
(B)(6) Project Management	35	20

(B)(6) Reviewer Comments:

SCOBES' project management partner, the National Center on Education and the Economy, has a substantial history of interest and engagement in matters related to education and the American workforce, the distillation of lessons learned from high performing countries, and assessment of student learning. It also has a strong history of partnership with cities, states, academic institutions and foundations on ventures related to school reform and instructional improvement. The project management team includes well-qualified personnel who bring considerable experience in a wide array of relevant projects.

Among individuals and groups identified as part of the management team is a communications firm. Although one can imagine the possible roles such an organization might play, there is little detail in the narrative to clarify SCOBES' need for, and the benefits to be derived from, a public relations firm (there is, however, some information about outreach, communications, and media relations). Without more detail, it is not clear how inclusion of this partner enhances the proposed plan.

Again, in this section, there is reference made to work already underway (i.e., the team led by Scott Marion), without explanation of the nature/scope of that work. The National Center for the Improvement of Educational Assessment (NCIEA) is certainly an excellent partner to engage in research designed by the Technical Advisory Team (TAC); although it is helpful to be informed that their work will not be funded under this grant but through other sources already in hand, some sort of breakdown of that research budget would help demonstrate a realistic approach to the many technical issues likely to require attention during the various phases of this project.

The applicant provides a summary table that sets forth the project workplan and timeline. Although this table outlines many of the key deliverables, major milestones, and timeframe, there appear to be some omissions and inconsistencies, specifically:

- The timeline between the start date of October 2010 and states' adoption of Board Examinations Systems (February 2010) is quite narrow, and does not include certification of the Board Exam providers, a critical step before states can adopt particular systems and prepare for the teacher training that is slated to begin in June 2011.
- Negotiation with providers for materials and services would seem to make sense before rather than after systems are adopted.
- Approval of cut scores is scheduled to take place before implementation of programs begins; this runs counter to the common practice of using sample student work to inform such decisions, and might be reconsidered.

The applicant presents useful background in the section on the project budget, including detail on planning and start-up funds already received and NCEE's application for an i3 validation grant that would compliment, not overlap with, support from the Race to the Top Assessment Program. The provision of two budgets (one based on award of both grants, and the other based solely on award of RTT-A funds) shows foresight; in the second budget, however, SCOBES undermines their own proposal by raising doubts about the likelihood that Board Examination System providers would be willing to adapt their materials with reduced numbers of participants (a key consequence of not getting both grants). Without modifications to bring these systems in line with CCSS, the program would not meet requirements set forth in the NIA.

Without more evidence to support the "fiscal dividend" anticipated by the applicant, their position that the entire cost of the academic program will be completely offset after the first three years' implementation in a school must be regarded with some misgivings. Students' decision to advance to community college—the most common among open-enrollment institutions—is based on many more variables than readiness to meet a certain academic standard. For some, undoubtedly, the move to a 2 or 4-year institution for higher education would allow them to avoid wasted "seat time" while earning credits towards a terminal degree or

as a steppingstone to admission to a selective college or university. However, taking a wider array of factors into consideration (only a few examples of which include family finances, social maturity, employment during high school by choice or because of need, and access to the array of resources and activities not provided by most open enrollment institutions), the applicant fails to convincingly demonstrate the viability of funding by States over time. Furthermore, current funding formulas for schools based on pupil enrollment may work against some of the anticipated savings due to qualified students' moving on to college.

Based on these observations, the response received a score in the medium range.

Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.

	Available	Score
Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.	10	0

Competitive Reviewer Comments:

The applicant's plan for preparing students for study in STEM-related fields derives directly from their plans to introduce Board Examination Systems more widely into American schools. The applicant believes that the purpose of the lower division program they propose is provide a firm foundation through "good, solidly designed courses in mathematics and science." Of concern is the implication that more cross-cutting or interdisciplinary courses would not be likely to be offered until grades 11 and 12, only after students had been prepared to meet the mathematics and ELA entrance requirements for open enrollment 2 or 4-year colleges. Unlike the course offerings described for grades 11 and 12, there is no detail provided to suggest a coherent course of study that addresses technology and pre-engineering as well as mathematics and science to prepare high school students for postsecondary study in STEM-related academic programs or careers in STEM fields.

As presented, the plan amounts to screening by academics and "leading researchers in the STEM disciplines" of course offerings of various Board Examination System providers for options that advance the STEM agenda. The proposal describes this team going through "the course and examination catalogues" of providers, but fails to indicate if any other resources will inform their selection process—which seems insufficient if based only on descriptive materials. No mention is made of scrutiny to ensure alignment with relevant CCSS or the means (in terms of time, labor, and funding) by which the adaptations most likely needed or advisable will be made. The applicant cites the reputation of Board Examination Systems as evidence of their rigor as courses of study designed to prepare students in STEM fields. However, there is insufficient detail to ascertain whether the courses offered by the various Board Examination Systems are more narrowly content-centered, or fully address the content, processes, skills, and language necessary to succeed in post-secondary study and careers in the STEM fields.

Input from one or more four-year granting IHEs will take the form of leadership by the president of Arizona State, identified as home to leading researchers in the STEM disciplines, in this review of course options. It is unclear what role beyond that IHEs will play in developing assessments for STEM courses.

Therefore (under the all-or-nothing basis), the response was not awarded points for this competitive preference priority.

Competitive Preference Priority 2: Focus on Career Readiness and Placement.

	Available	Score

Competitive Preference Priority 2: Focus on Career Readiness and Placement.	10	0
<p>Competitive Reviewer Comments:</p> <p>As presented, the applicant's plan for high school assessments for components of a rigorous course of study in career and technical education amounts to screening of course offerings of various providers of technical qualifications in order to identify "at least three rigorous career and technical offerings in the upper division of high school that result in industry-recognized credentials in three broad high-growth occupational areas." Although the applicant indicates that one of the tasks is "to identify broad, high-demand, high-wage occupational areas that are appropriate to introduce and certify at the secondary level," no detail is provided to indicate how this identification will be accomplished. The example provided--preparation for a career in media--offers no evidence that such a related sequence of courses will comprise a rigorous course of study in career and technical education.</p> <p>The plan for determining the best sequence of courses involves credible partners from the business community. The description of the work they will undertake is quite general (reviewing and comparing assessments and qualification systems). The possible work involved in step two--promoting the new courses and assessments, is similarly vague. The applicant expresses confidence "that US colleges and businesses will be willing to adopt and honor" the qualifications offered by the selected programs of study, but bases this only on their being "highly regarded."</p> <p>Although the applicant expresses in this section recognition that "some adaptations may need to be made," there is no provision for doing so provided in the narrative or in the budget.</p> <p>Given these observations and concerns and the "all-or-nothing" basis for doing so, the response was not awarded points for this competitive preference priority.</p> <p><u>Suggestions to DOE:</u></p> <p>There is no indication of any intent to examine these course offerings—including their assessment components—for coherence with, if not alignment to, relevant standards included in the CCSS. It seems advisable to do this in order to ensure that this option is complementary—not in conflict with—the core academic program that will serve as one option for high school students.</p>		

Absolute Priority: High School Course Assessment Programs

	Available	Score
Absolute Priority: High School Course Assessment Programs		No
<p>Absolute Reviewer Comments:</p> <p>SCOBES brings together a number of states that have been at the forefront of important education reform endeavors and a proposed management partner with extensive experience and forward-looking and global vision. That management partner has demonstrated through past and current projects a commitment to reforming American high schools and improving their chances of success in college and careers. It is because of the strength that should be possible from this consortium but which is not adequately demonstrated in the application, more than anything else, that the proposal failed to meet the absolute priority.</p> <p>The proposed assessment program will, for each course in that program, measure student knowledge and skills against college- and career-ready standards defined in relation to expectations of open-enrollment IHEs regarding what students must know and be able to do to succeed in entry-level mathematics and ELA courses without remedial coursework as a prerequisite. The rigor of the assessments and the courses associated with them from which the proposed program components will be adapted is generally recognized. However, without more information about item and task types (including possible performance events), the applicant has not sufficiently demonstrated that these assessments will indeed elicit complex student demonstrations or applications of knowledge and skills.</p>		

The voluntary nature of student participation calls into question the appropriateness of using student performance data to make determinations of individual principal and teacher effectiveness. Although the program will produce student achievement data that can inform teaching, learning, and program improvement, the proposal lacks detail on the means by which this will happen. For example, this is not clearly addressed within the training/professional development offered by the various Board Examination Systems. The proposal does not attend to the need for validation studies to address the uses of these systems for purposes and audiences other than originally intended (e.g., for college preparedness rather than college course replacement).

Insufficient detail is provided to convincingly demonstrate that the proposed program will produce student achievement data and student growth data that can be used to determine individual principal and teacher effectiveness (and identify support needs) or to inform teaching, learning, and program improvement. While the proposal provides adequate evidence of the suitability of the assessments for students with disabilities, it does not do so for English learners. In fact, the section of the proposal ([d][v]) that deals with accessibility for the broadest range of students demonstrates no familiarity with accommodations and test item features that improve accessibility for English learners—and speaks instead only to the availability of "English language courses for non-native speakers."

Finally, particularly given issues about the adequacy of funding without the award of an i3 grant in addition to this grant, it is not clear that assessments for multiple courses can be implemented in each member State at a scale that will enable significant improvements in student achievement outcomes statewide.

For all of these reasons, in spite of the real appeal of the concept and goals that inform this proposal, the applicant is deemed to have not met the absolute priority.

Grand Total

220

89

Budgets

Level 1 Budget

Name: Level 1 Budget(s)

SCOBES has with justification provided two budgets, in order to account for the award only of the RTT-A grant and for award of both that grant and the i3 grant for which they have applied.

Some observations related to Budget #1 worth noting include:

There are no travel costs included for TAC, although the description of their responsibilities elsewhere in the proposal makes it likely that they will require some face-to-face meetings (alone or with Board members or others).

There appears to be some inconsistency (and overlap) in funds allocated for the STEM Task Force under 3) Travel and 6) Contractual.

Some observations related to Budget #2 worth noting include:

It is not clear why, given the need to "scale down" the program if i3 funding is not secured, all estimates for staff time and salary remain the same as for Budget #1.

It is not clear from the narrative what accounts for the reduction in budget for the Career & Technical Education Task Force (e.g., specifically how their scope of work and/or mode of operating will need to be changed due to reduced funds).

Suggestions for DOE:

Because anticipated salaries for personnel are quite high and reflect commitment of all, or a large percent, of designated staff member's time, it would be advisable to ask for documentation of those individuals' current commitments and anticipated commitments of the term of the grant. This would allow the Department to ascertain whether the proposed % FTE is realistic and achievable in all instances. Given that so much rests on the competence of the individuals identified, it might also be advisable to ask for clarification of how any changes in personnel will be addressed (specifically, what role, if any, the Department would have in reviewing/approving those changes).



Race to the Top

High School Course Assessment Programs Technical Review Form



Board Examination Systems Application #BES (b) (6)

(B)(1) Consortium Governance

	Available	Score
(B)(1) Consortium Governance	30	25

(B)(1) Reviewer Comments:

SCOBES' governance structure is suited to the ambition and structure of the project and is likely to facilitate the successful design, development, and implementation of the proposed high school course assessment program. The Consortium's vision is straightforward -- to create and implement a demonstration project and evaluation study capable of convincingly proving that overseas and domestic board certification systems (courses, curricula, and examinations) that can be customized appropriately so that they (1) align to the CCSS standards; (2) measure students' college-and career-ready status (after grade 10) sufficiently so that students passing the examinations can be awarded a diploma that the member States agree to create which qualifies students for admission to open-admission public 2- and 4-year university programs; (3) provide an opportunity for other passing students to stay in high school and complete the upper-division board certification process to enhance their qualifications for competitive university admission; and (4) in the process, expand the portfolio of options that States, districts and schools (and students and parents) have to choose from in moving students, especially, poor and minority children, to college readiness. By virtue of the voluntary nature of the program, SCOBES makes clear that it is not proposing a program that it expects States to adopt and require for all high schools and their students, and instead is aiming to add to the currently insufficient menu of available combinations of assessments and curricula that are capable of preparing a broad range of students (including very high- and low-performing students) for success in college. By virtue of the focus of the proposal, and the qualifications put on States' commitments to go to scale, SCOBES also makes it clear that its proposal is for a demonstration pilot and study designed to rigorously demonstrate (or not) the capacity of board certification systems to be customized so that they can improve college readiness, particularly for students who enter the ninth grade performing below grade level. In this sense, the proposal is not to take an existing and proven program to scale, but to prove that a new program (actually a substantial adaptation of existing programs designed for other purposes) is worthy of being taken to scale. Each of the original 10 member States (all member States are Governing States) agrees to take part in the pilot, including up to 10 schools from each State and to provide the necessary data for a rigorous evaluation of the program. If the evaluation reveals evidence of improved student performance, the State commits itself to formally establish the relevant diploma and to take the program to scale statewide. Later-joining States, of which there are already two, agree to the same thing, except they won't have access to Consortium federal grant funds (i3 and RTTT-A, if awarded), only need to pilot the program in 5 schools, and need not take part in the pilot evaluation.

Kentucky is SCOBES's lead and procurement State. SCOBES has formed itself into a 501(c)(3) and hired a Project Management Partner (PMP), which together with the distinguished members of the Consortium's Technical Advisory Committee (TAC), has substantial operational responsibility and discretion, subject to oversight by a Board of Trustees composed of two members from each State, one of whom is the Chief State School Officer and the other of whom is a high-ranking representative of one or another stakeholder. The Board is widely representative of stakeholders, including members of state boards of education, a state legislator, a higher education official, a member of the business community etc. This 501(c)(3), with

relatively broadly empowered operational staff overseen by a board is a proven governance and management structure.

The Board of Trustees has a presumptive majority rule for decisions, but a super-majority requirement (2/3rds) if a significant number of member States (3) want a matter decided by super-majority. The Board also has at least three well-defined subcommittees (Executive, Nominations, Finance), which also follow standard practice for arrangements of this kind.

Although the super-majority requirement has a capacity to delay action, four aspects of the proposed structure provide confidence that this won't occur. First, the PMP, as the executive arm of the 501(c)(3), has clear operational power and discretion over day-to-day actions. Second, the MOU sets out the most salient aspects of each States' responsibilities, so some of the hardest issues have already been agreed to -- and have to be agreed to as a prerequisite to membership by additional States. Third, the overall scope of the work is relatively confined and commonly understood, so the likelihood of major unexpected issues is less than it might otherwise be. Finally, the Consortium appears to have operated well under this structure since its creation in 2008 (before the issuances of the NIA), and it has made substantial progress since then, including adopting bylaws, creating an impressive and widely representative Board of Trustees and TAC, filing an i3 application, conducting substantial research on Board programs around the world, etc.

Entry and exit from the Consortium is well-defined and two new States have already gone through the entry process.

Participating States have well-established rights and responsibilities, and the latter include substantial evidence of commitment to the project, including participation in the pilot and the taking of actions after the pilot, if its results are good. The MOU commits member States to "be bound by every statement and assurance in the Consortium's grant application."

KY will serve as procurement agent to identify a list of qualifying vendors through a process that is well-defined. Most member States and their LEAs are legally able to purchase off of that list. A minority of other States are not and will use their usual, individual procurement methods. This creates some risk to the goal of a common list of programs from which the Member States and their LEAs and schools choose, but the risk seems manageable.

At least four major challenges are visible at the outset, and are identified as such by SCOBES: (1) Whether sufficient numbers of available Board vendors can be induced to align to the CCSS standards; (2) relatedly, whether the vendors can be induced to customize their existing curricula and assessments, which are currently designed to prepare students for elite universities -- or even beyond that, to enable them to place out of courses offered in such universities -- so that the curricula and assessments instead prepare students for credit-bearing courses in open-admissions 2- and 4-year colleges and universities without need of remedial services; (3) whether measures of student growth can be developed that are sufficiently comparable across different programs; and (4) whether sufficient numbers of students in schools with large proportions of low performing entering students will choose to take part in this voluntary program and succeed when they do. In regard to the first two problems, there are concerns expressed in these comments whether the extent of alignment to the CCSS and to open-admissions college standards that the Consortium contemplates is sufficient. As to the third issues, the Consortium acknowledges the difficulty but proposes a number of possible strategies which provide a reasonable probability that informative growth comparisons within and across programs can be made. As to the final issue, the Consortium is requiring that 4 of the pilot schools from each State are made up of primarily low-performing students. As a result, close to 40 such schools will participate in the pilot. That should provide a useful indicator of how the program works in such schools, and the results from the pilot will, in turn, provide some indication whether students at such schools can make good progress when they are exposed to the Board programs.

Another complication is the return on the federal government's investment in this program, given (1) the possibility that the Secretary will decide to award an i3 grant, and (2) the substantial foundation funding the Consortium already has obtained. This issue is relevant to this category in regard to the applicant's vision for the use of the funds. The issue arises in regard to how the \$30 million requested here would be spent, assuming a \$30 million i3 grant is also awarded. It appears as though the additional \$30 million (if both grants are awarded) would go mainly to boosting from 4 schools to 10 the number being piloted in each

State. The application indicates (quite sensibly) that the Consortium's highest research priority is in regard to schools with high numbers of relatively low-performing entering students. The Consortium evidently intends that the 4-school option (supported by the initial i3 grant) would involve only schools with low-performing students, and the 10-school option (supported additionally by RTTT-A) would add 6 additional schools to assure that the 10 schools as a whole reflect the State's overall population. If this understanding is correct, and if the bulk of the additional (RTTT-A) funding would thus be to support schools with relatively high performing populations, the question of the federal government's return on investment is substantial and requires consideration.

SCOBES's application states forthrightly that SCOBES will proceed with this project, whether or not it receives federal funding. In the event that there is no federal funding, participating States and schools evidently will pay for the Board materials themselves. Indeed, two new States (beyond the original 10) have agreed to participate and contribute 5 schools to the pilot (but not the evaluation), notwithstanding that they will not have access to any federal funding. Under these circumstances, it seems sensible to fund this program at \$30 million in federal funds with a focus on primarily low-performing students, but may not be sensible to fund it at \$60 million in such funds.

Recommendation:

* In the event that the Secretary were to award the requested \$30 million i3 grant, obtain additional information from the applicant in regard to the nature of the student bodies of the additional 6 pilot schools/State that would be funded by the requested \$30 million in RTTT-A funds and the justification for funding pilot participation for the additional schools.

* Clarify and assure that the composition of the 4 pilot schools per State, in the event that the total federal funding is \$30 million or less, will all be schools with large populations of low-performing schools.

(B)(2) Theory of Action

	Available	Score
(B)(2) Theory of Action	5	5

(B)(2) Reviewer Comments:

SCOBES's theory of action, as lucidly rendered in the flow chart and argument steps in Appendix H, makes an impressive case for the capacity of its program, if validated by the rigorous evaluation it proposes, to improve academic outcomes for significant numbers of currently low-performing high school students. In doing so, SCOBES convincingly explains how it intends to customize, "Americanize" and democratize a rigorous approach that has been used to good effect in other nations but in ways that would not be suited to equal educational opportunity commitments in this country. By providing students with choice in terms of Board programs, courses of study, and steps following successful completion, the Consortium would provide an attractive set of alternatives, that does not currently exist, for high school students who volunteer to participate, including, most importantly, a diploma after two years of high school that the State's open-enrollment universities would accept as sufficient for admission and for placement in credit-bearing courses. The Consortium's program would additionally provide a benchmark against which to measure other programs that are designed to enable low performing students to become college- and career-ready. The Consortium's intention to provide programs across ELA, math, history, science, art and career/technical and to take concerted steps to make the program accessible to students who reach 9th grade unprepared for high school speak to the goal of diverse course offerings for students who have not typically had access to rigorous options, with a real chance both of realizing the full potential of the CCSS standards and of improving student achievement and college and career readiness. Importantly, the theory of action is not to prove the mettle of a program to which States would then commit for all high schools and all of their students, but instead to prove the worth of a program that adds to the portfolio of options that

States, districts, school, students and parents can choose to enable students to graduate college-ready and succeed in higher education.

(B)(3) Course Assessment Program Design and Development

	Available	Score
(B)(3) Course Assessment Program Design and Development	60	48

(B)(3) Reviewer Comments:

SCOBES's design and customization of existing assessment programs is impressive overall and feasible, scalable, and consistent with its theory of action. The range of existing Board products under consideration for customization is fairly broad, and provides the multiple components (assessment, curricular, formative), complex demonstrations of proficiency, rigor, and subject-matter breadth the NIA seeks. The Consortium's commitment to set pass points for lower division exams to the actual cognitive challenge of the initial credit bearing courses in the nation's open admissions 2-year and 4-year post-secondary institutions provides further evidence of rigor, although the limitation to open-admissions institutions needs to be better explained, given the wide terrain that covers. The key question is whether the standards the Consortium develops in this fashion are the lowest common denominator of existing open-admission institutions, or whether some more rigorous line is intended.

Because the Consortium intends to customize existing, well-known and well-specified programs, the degree of risk involved is somewhat lower than in regard to the creation of assessments and aligned curriculum and professional development from scratch. Difficulties nonetheless will arise in the effort to get product companies to engage in the considerable customization of their products that is required -- something vendors often say is easy to do, but then resist in practice because of their commitment to their existing products, and their existing customers who want the products to remain as is. This is especially so, of course, if the proposed contract or new market is a small proportion of the vendors' overall sales.

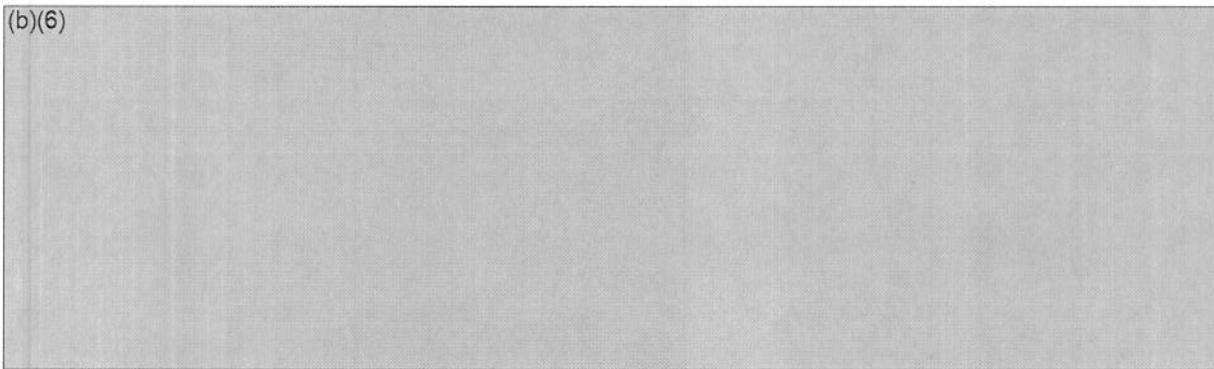
Assessing the customization risk more effectively requires a comparison of the vendors' existing markets worldwide and the market they could hope to achieve through the proposed customization -- matters that at the least should be carefully considered in the procurement process. Based on what is now known, customization of existing products in search of a new market in 40 or 100 pilot schools may not, by itself, be likely to provide a large enough incentive for many of the vendors to engage in conscientious customization. This concern is especially great, insofar as the vendors' current customers typically are entire nations (in contrast to the Consortium, which allows for choice by individual schools), and insofar as the company typically acquires a monopoly (in contrast to the "competitive-list" strategy the Consortium States intends to use). On the other hand, the prospect of creating a new market in 12 entire US States (and more States over time) -- could give the Consortium the kind of leverage it needs to have in order to convince vendors to make important changes in their products. Overall, the high degree of optimism expressed in the proposal may not be warranted but some degree of optimism is appropriate.

Of particular note are the following customization and related concerns:

* The vendors already under consideration have assured SCOBES that they are prepared at their expense to align their offerings with the CCSS and to customize their standards, curricula and assessments to prepare students for admission to open-admission public universities and for immediate placement, without remedial services, in credit-bearing courses in those institutions. Based on experience, vendor promises to align an assessment product to a new customer's different set of standards often lead to only cosmetic changes. SCOBES acknowledges this risk and promises a demanding review and certification process including through the offices of a Technical Advisory Committee with distinguished members and ample representation of the higher education institutions that students would be preparing to attend. The proposal is, however, less focused on the difficulties of curricular (as opposed to standards and assessment) realignment than perhaps is warranted.

- * Cutting in favor of the program is the Consortium's aspiration to extend the recent CCSS standard-setting effort, which currently applies only to ELA and math, to include science and history, among other subjects.
- * Changes in vendors' item types and scoring practices may be required if the Consortium determines that reliability requirements demand more selected-response questions than is currently the practice in Board programs. These changes will be particularly painful for vendors to make because they change the very character of their product.
- * Relatedly, a major difficulty will be achieving the degree of confidence in inter-rater reliability across scorers within individual programs, not to mention across programs. Here again, the level of attention given to this difficulty is less than might be ideal. That said, the call for a better balance between reliability defined as uniformity and fidelity to cognitive demand level and depth of subject matter is a plus for the proposed program.
- * The Consortium commits to aligning new curriculum and assessments to CCSS and measuring the endpoint in the same, "college- and career-ready" (CCR) way that the CCSS do. But there is no commitment to have vendors segment curricular units, assessment items, subs-scores and reports to align to each of the individual CCSS standards. Doing so would assure greater fidelity to CCSS.
- * The summative achievement measure tied to CCR holds promise as an accountability option for schools and districts if the Consortium can assure some degree of comparability in outcomes between the various programs. On this score, it would be good to have more detail on how the Consortium intends to assess whether sufficient comparability has been achieved.

(b)(6)



- * The discussion of accommodations for English Learners and for students with disabilities, including as laid out in the Appendix, appears to be somewhat superficial. Although accommodations such as readers and additional time, which are appropriate for both sets of special needs populations, are discussed, the level of detail devoted to this issue is thin. Further study and analysis is likely to be required.

Recommendations:

- * Better explain the Consortium's understanding of the term "open admissions" institutions as the measure of college-and career-ready.
- * In the Request for Qualification SCOBES proposes to release, ask prospective vendors to provide information, using a common rubric, of market share and structure in different countries, in order to facilitate negotiations and predictions about willingness to customize fully in the direction the Consortium desires.
- * Provide better evidence of the review process and standards to be used to test the sufficiency of (1) program realignment to CCSS, and (2) curricular and assessment realignment to the needs of students preparing for admission to state open-admissions universities and to immediate entry (without remedial services) to credit-bearing courses in those universities.
- * Consider requiring vendors to tag particular course content, assessment items, and assessment sub-scores to the various individual CCSS standards.
- * Flesh out the mechanisms through which comparability between Board programs will be achieved.

* If it isn't intended already, add an accommodations study to the Consortium's research agenda to determine whether the Board programs' existing steps are sufficient.

(B)(4) Research and Evaluation

	Available	Score
(B)(4) Research and Evaluation	25	18

(B)(4) Reviewer Comments:

SCOBES has a solid research and evaluation plan for ensuring validity, reliability, fairness and effectiveness for the intended purpose. Its research plans and methods are generally sound, and its panel of experts and study directors are highly qualified. Implementing a well-designed and reliable evaluation of the 40- or 100-school pilot is central to the Consortium's theory of action because SCOBES intends to rely on the strength and credibility of the study results -- which are likely to be subjected to heavy public and scholarly scrutiny -- to convince large numbers of students, parents, schools, districts and States to participate in board certified programs. Consistently with that theory of action, the Consortium has taken substantial care to identify qualified researchers and to design a comprehensive and reliable study of the pilot's results.

Some concerns arise, however. First is a concern about the extent to which the evaluation will assure fidelity to the CCSS and to the goal of common achievement and growth measures. The concern arises in this section because of the intention to evaluate only whether the Board assessments are "compatible with the CCSS" and "roughly compatible with each other." This qualified language contributes to concerns identified in other comments about (1) the extent of alignment with CCSS that is being sought, and (2) the extent to which the assessments will allow common measures of achievement and growth across the different assessments that are part of the proposal.

Another concern is whether the customization that will be required to bring the tests into alignment with CCSS and to assure acceptable scoring techniques will mean that data and findings from preexisting studies of the relevant programs are not terribly useful to the Consortium. In Appendix I, the Consortium presents an impressive array of existing studies on Board programs, but the question may arise whether the customizations contemplated undermine the ability to generalize from these studies to the programs SCOBES will generate.

Three other concerns are as follows:

* The approach of defining "college- and career- ready" by reference to standards for success in credit-bearing courses that currently are given in open-admissions institutions, as measured by the curricula, texts and tests those institutions actually use, will shed light where none has been shed before. The difficulty, however, which is not addressed directly in the proposal, is that the standards currently applied by some institutions within this band of higher education institutions may be too low. This could subject the SCOBES model to criticism that it will create a two-tiered system, with unacceptably low expectations in the "lower" tier. This would occur if SCOBES intends to take community college standards as they currently are, without exercising judgment among them. The Consortium currently offers no solution to this problem, e.g., via a process through which different standards discovered in different States and institutions are compared and benchmarked, creating a race to the top among them.

* As seemingly well-funded as it is, the Consortium's overarching evaluation, on which so much hinges, does not achieve the rigor of an experimental or quasi-experimental study. Instead, control schools and students will be identified through a matching process that will not control well for the motivation of volunteering students and, possibly, for school and other differences. This could lead the outcomes of the study to be subject to the criticism that better or worse results for some students and schools compared to others are a result not of the treatment (the Board program) but as a result of unaccounted for differences

in the students and schools. It is generally thought that quasi-experimental strategies are preferable to matching techniques, everything else equal. Consideration or reconsideration should be given to models that create lotteries in schools for desirable but limited seats in these grant-funded programs. Doing so would enable use of a quasi-experimental model at the student level. The experimental student studies then could provide a check on the rigor of the matching techniques used at the school level.

* There also is a concern whether 4 schools per State (or even 10) is sufficient either to provide solid school-level results or even to control for school effects at the individual-student level. The proposal provides less elucidation on this point than is optimal.

Recommendations:

* Review the rigor of the methods used to determine Board program alignment with the CCSS and to determine the alignment of newly customized curriculum to admission to open-admission universities and immediate placement in credit-bearing courses.

* Address the possibility that existing credit-bearing-course standards in some open-admission institutions are too low, e.g., by benchmarking those standards against each other.

* Consider adopting a quasi-experimental design for student level studies as part of the evaluation.

* Provide additional information on the capacity of both the 4-school/State and 10-school/State models to create enough variance to provide reliable evidence of program success at the school level of analysis and to control for school effects at the student level of analysis.

(B)(5) Course Assessment Program Implementation

	Available	Score
(B)(5) Course Assessment Program Implementation	45	25

(B)(5) Reviewer Comments:

SCOBES's plan for implementing Board programs starts with a pilot designed to prove the concept. If evaluation validates the model, the Consortium expects to increase the number of participating high schools by about 50% each year through 2017-18. For States like New Hampshire and Rhode Island, with a relatively small number of high schools, this would mean that half or more of their high schools would be involved by the end of that period. For larger States, like New York and Pennsylvania, the percentage would be much smaller (less than 10%). SCOBES's projections are necessarily uncertain, given the voluntary nature of the program from both the student and school perspective and given that LEAs and schools have not committed to participating beyond the pilot stage. The rigorous evaluation of study, as well as States' commitments to provide the authorizations and attractive new diplomas necessary to facilitate the program should assist recruitment over time, as should the prospect of saving money as students exit high school earlier on their way to post-graduate opportunities (assuming States commit to hold districts harmless for reduced enrollment as a result of the success of these programs). In the latter regard, however, unless States and LEAs pass on some of those savings to schools (e.g., in the form of ongoing resources to assist students entering high school behind grade level), the money savings could be perceived as a loss, not a dividend. SCOBES's projections are conservative in one sense: They include only the Consortium's initial 10 States, even though 2 additional States are now taking part, and others may join. All in all, although the prediction of a 50% increase in enrollment each year (assuming that the evaluation study demonstrates the effectiveness of the program) is reasonable, particularly given the rising demand among poor and minority students and parents for better preparation for, and enhanced access to, higher-education opportunities and for earlier entry into college.

SCOBES's projections are, of course, contingent upon the Board programs' successful contribution to improved student outcomes as demonstrated by the planned evaluation. Another contingency is created by

changes CCSS States will be undertaking more generally as a result of their adoption of the new standards and of new assessment and accountability systems tied to the standards. As States create more rigor around high school standards and assessments, the Board programs could provide a ready mechanism for high schools to use to help their students meet standards and help themselves meet their accountabilities. In that case, the numbers SCOBES presents may be very conservative. Alternatively, initiatives besides Board programs that are more closely aligned to the CCSS could out-compete SCOBES's programs, making its projections overly optimistic. A lot will turn, therefore, on the seriousness with which SCOBES requires Board programs to align to the CCSS – not only in regard to the overall outcome measure of "career- and college-ready" but also by systematically tying their ELA and math course content and units and their assessment outcomes and reports to each of the component CCSS standards. Concerns expressed in comments to other selection criteria in regard to the thoroughness of the intended alignment between SCOBES's Board programs and the CCSS apply here, as well.

The specifics of SCOBES's implementation plan are fairly well laid out in this section, in the omnibus timeline in (B)(6), and in the more detailed timeline in Appendix R. A lot depends, of course, on the details of each of the Board programs. One concern that arises is whether the up-front training programs for educators involved in the program will be sufficient – a problem especially for those programs based outside the US. Although each of the Board programs identified thus far has some formative components described in an Appendix, it is not clear how fully they develop educators' ability to use assessment outcomes (e.g., by course unit, by educational standard, and by student group and individual students) to diagnose unmet needs and instructional weakness and respond accordingly.

If the success of the Board programs is demonstrated by the evaluation study, that success together with the establishment of a new diploma enabling students to exit high school earlier and enter college ready immediately for credit-bearing programs will provide strong inducements for students to enroll in Board programs. But efforts to advertise and promote the programs success will likely be necessary, in addition, to assure increasing student participation. The proposal does not currently focus sufficient attention on such efforts.

Recommendation:

- * Consider whether the contemplated extent of the alignment between Board courses and assessments and the CCSS will enable SCOBES programs to compete with other programs in schools, LEAs and districts that are strongly committed to the CCSS.
- * Seek further detail on how effectively educators can use underlying data to drive instructional improvement.
- * Enhance plans for promoting enrollment in Board programs to students and families who are not aware of their value.

(B)(6) Project Management

	Available	Score
(B)(6) Project Management	35	25

(B)(6) Reviewer Comments:

SCOBES's project management plan is impressive and provides substantial confidence that it can deliver the proposed high school course assessment program on time, within budget, and in a manner that is financially sustainable over time. Its management team has a broad range of substantive expertise in high school standards and assessments as well as significant management, operational, and financial experience in a variety of settings. In particular, during its history, the PMP has incubated and effectively brought to scale two major combinations of K-12-related products and services not unlike the one

envisioned here, both of which have demonstrated value in improving student outcomes. If the PMP received full funding for this program (including both \$30 million federal requests), however, it would increase its budget by a significant margin (the amount is not clear from the application), meaning it would be moving beyond its previously demonstrated capacities in significant respects.

The project work plan and timeline (both in (B)(6)(b) and Appendix R) are strong. With the exception of the work streams relating to STEM and to a lesser extent Career and Technical Education programs, each of the eight program components and timelines is laid out in clear and logical detail, with tight time intervals indicating the Consortium's success thus far in breaking down the work into manageable chunks and subjecting each to a reasonable time frame. In a few cases -- evaluating the Board Exam programs in relation to the CCSS, determining college-ready performance levels and assembling evidence needed to set cut scores -- the plan may allocate insufficient time.

A concern, also flagged in comments to (B)(1) above, is in regard to the budget, assuming full federal funding (both i3 and RTTT-A grants) or partial (RTTT-A) funding. The budget is adequate to support the development and proof-of-concept evaluation of a high school assessment program that meets the requirements of the absolute priority, and the potential contributions the program can make to improved student outcomes are substantial. It is less clear, however, that the costs are reasonable in relation to the design and the number of students to be served. To begin with, the project appears to have very high administrative expenses in regard to personnel costs for the top five leadership roles, which have annual salaries ranging from (b)(6) 100% of which is devoted to the project) to (b)(6) (75% of which is allocated to the program), exclusive of fringe, and which appear to include overlapping and unnecessary functions. The evaluation and state coordination funding also seems high in both budgets (Budget #1 assumes both federal grants; Budget #2 assumes only RTTT-A funding), but especially in Budget #1. Notably, however, the Consortium has allocated grant dollars to particular budget items, and intends to pay for nearly all of the personnel, evaluation, and state coordination out of private funds (a Gates Foundation grant) and the PMP's own budget. Even so, the administrative and personnel costs appear to be excessive as currently set forth.

Focusing, then, on categories for which federal funding is sought:

* The Board Exam System costs are the bulk of the RTTT-A request (\$35.3 million for 10 schools in each of 10 states in Budget 1; \$14.1 million for 4 schools in each of 10 states in Budget 2). A concern arises based on the small number of students initially affected, but much of that concern is allayed by the States' clear commitment in the MOU to take the program to scale statewide -- and to induce students to participate by providing them with an attractive new diploma -- if the evaluation demonstrates the success of the program. The more difficult issue is the one raised in comments to (B)(1) above -- whether two \$30 million streams of federal funds are reasonable in relation to grant objectives: (1) funds for curriculum, assessments and services, which member States and participating LEAs and schools evidently are willing to pay for themselves, for four low-performing pilot schools each, if federal funding is not forthcoming; and (2) funds for the same assistance for an additional 6 schools in each State, to assure participation by a pilot group of schools that is representative of all schools in the State. Federal grant support for 4 schools per State with mainly low-performing students seems justified to assure that SCOBES can prove its potentially impressive concept. The additional support for schools with already higher-performing students is harder to justify. The best case for the additional funding is that the evaluation in the 10-school model could provide a stronger case for statewide adoption of the program.

* The supports for struggling students at low-performing schools seem worthwhile and would be especially so if member States agreed to redeploy resources saved as a result of early graduation of students to this effort once federal grant funding is ended.

* Overall, no more than \$30 million in total federal funding seems to be warranted.

SCOBES's demonstration of States' ability to bear the costs of the program after federal funds are spent depends upon savings incurred as students, who would otherwise would remain in public high schools for four years, instead graduate high school after two years and move on to public universities. This funding model works, however, only if States commit to holding districts harmless for the loss of students through this process. Undertakings to that effect do not appear in the MOU.

Recommendations:

* See recommendations in comments to (B)(1) above about the need for clarification in regard to the 6 additional schools to be funded by the RTTT-A grant in the event that I3 funding is forthcoming.

* Scale back the requested funds to provide support only for inclusion of schools with high proportions of entering students who are performing below grade level. If four schools per state are sufficient for the pilot and proof of concept, then limit the funding to those four schools. Seek clarification whether additional schools, beyond the four, are necessary for the proof of concept.

* Significantly reduce personnel costs.

* Consider asking any Part (A) consortia that are funded to join with Part (B) consortia in overlapping activities where there are significant economies of scale and network effects to be achieved, and fewer competitive gains to be made. This particularly applies to developing new technology (not relevant here) and to setting achievement standards for "college- and career-ready" and cut points satisfactory to IHEs. (Growth models, by contrast, are an area where development of multiple new models is a good idea, and competition between consortia, rather than formal cooperation between them, would be a good idea.)

Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.

	Available	Score
Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.	10	0

Competitive Reviewer Comments:

SCOBES has a high-quality aspiration, but not yet a high-quality plan, to develop -- within the grant period and with input from one or more four-year degree-granting IHEs -- assessments for high school courses that comprise a rigorous course of study that is designed to prepare upper-year high school students for rigorous postsecondary study and careers in the STEM fields. It has identified a highly qualified partner in Arizona State University and its President and describes a notional process through which a panel of experts would assemble to assemble a rigorous program of STEM courses and assessments that from existing programs that would conform to the NIA's goals. But there is no plan for how and on what schedule the meetings entailed would generate agreement on course and assessment designs, and then would lead from there to the production and implementation of the relevant content. The difficulties of taking individual courses from very different programs and assembling them into a single course of study, with an aligned curriculum and a coherent assessment strategy are not addressed. Additionally, the letter from the President of ASU in Appendix S includes no commitment to undertake the development process the proposal lays out. Instead, the single sentence the letter devotes to STEM puts the responsibility on the Consortium to do the work needed in this regard, and does not commit the University or its President to the process the proposal describes. Nor, finally, is there much detail in this regard in the (B)(6)(b) or Appendix R timelines or in the budget. While steps towards the high-quality plan required under this competitive preference category are described, the steps actually taken do not get the proposal across the all-or-nothing threshold.

Competitive Preference Priority 2: Focus on Career Readiness and Placement.

	Available	Score
Competitive Preference Priority 2: Focus on Career Readiness and Placement.	10	10

Competitive Reviewer Comments:

SCOBES has a high-quality aspiration, and a plan, to develop -- within the grant period and with relevant business community participation and support -- assessments for high school courses that comprise a rigorous course of study in career and technical education that is designed to prepare high school students for success on technical certification examinations or for postsecondary education or employment. It has identified three qualified partners (two of which provide somewhat specific letters of support) from business, higher education, and the Career and Technical Education (CTE) community to serve on a CTE Task Force, and has committed to creating three or more rigorous career and technical offerings in the upper grades of high school that would result in industry-recognized credentials in three broad high-growth occupational areas. As a starting point, the Consortium has identified three existing English systems of technical qualifications, each of which includes courses, curricula and evaluation mechanisms. And the Consortium has identified a number of promising occupational areas. The goal is to adapt the existing English systems to the US context, then promote their adoption by high schools and community colleges. The description of the steps to be taken in the narrative, timelines and budget are not as well developed as they could be in describing particular milestones and deliverables that will lead to the development of the CTE program. But, on balance and acknowledging that it is a close case, the clarity of the CTE starting point (the three existing systems), the specificity of the goal to create three offerings, and the specific commitment made by the identified partners (who agree to participate in a specified decision making process) are sufficient to satisfy the qualifications for this competitive preference priority.

Absolute Priority: High School Course Assessment Programs

	Available	Score
Absolute Priority: High School Course Assessment Programs		Yes

Absolute Reviewer Comments:

SCOBES's application demonstrates that it will develop and implement a high school course assessment program with multiple courses and assessments, and a common baseline expectation of rigor, that multiple States are committed to implementing at scale for students across the performance spectrum. The Consortium States commit to accomplish this by providing attractive new diplomas and early-college opportunities that are capable of fostering broad-scale student participation in the event that the proposed proof-of-concept is successful.

The Consortium's plan includes assessments that will be certified by a distinguished set of experts as rigorous, valid, reliable, and fair for their intended purposes and students. Because that certification process is designed to assure preparation of students for early admission to public open-admission universities and for placement in credit-bearing courses without remedial services, because the certifying body includes ample representation by the affected higher-education institutions, and because States commit to providing a diploma that assures admissions to those universities in the event that the planned evaluation demonstrates positive results, the proposal generates sufficient confidence that the assessment program will reliably measure student knowledge and skills against rigorous college- and career-ready standards as defined in the NIA.

The Board programs involved are designed, far more than even the best existing statewide assessments, to elicit complex student demonstrations and applications of knowledge and skills.

Although there are significant difficulties posed by the proposal's use of multiple assessment systems, most of which focus far more on performance than on standardized measures of student learning, the Consortium has put forward a credible process for translating the achievement and student growth data the assessments generate into measures that can inform determinations of individual principal and teacher effectiveness and professional development and support needs, as well as teaching, learning and program improvement. It is unlikely that these measures would be satisfactory for use as statewide or national accountability metrics, but the absolute priority requires something less -- that the measures be able to

inform evaluation and professional development decisions. In other words, there is some risk whether the courses and assessments will produce sufficiently comparable student achievement and growth data to be used to inform determinations of school, principal and teacher effectiveness, but the Consortium recognizes those requirements and has a credible process and plan to meet them that provides sufficient confidence that the Consortium will succeed.

Key concerns relate to (1) the extent of alignment with CCSS, (2) the sufficiency of the customization of existing curricula to prepare students for credit-bearing courses in open-enrollment universities, and (3) the size of the overall budget request. Those concerns do not undermine the Consortium's satisfaction of the absolute priority, however, and recommendations for alleviating the problems are contained elsewhere in these comments.

Grand Total	220	156
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Budgets

Level 1 Budget
Name: Level 1 Budget(s)
Comments on the SCOBES budget are set out in the (B)(6) comments above.



Race to the Top

High School Course Assessment Programs Technical Review Form



Board Examination Systems Application #BES (b)(6)

(B)(1) Consortium Governance

	Available	Score
(B)(1) Consortium Governance	30	26

(B)(1) Reviewer Comments:

- A clear vision statement is provided and is evaluated as a positive because it proposes to align with existing examination systems in the world rather than fund development of a new system. The notion is strengthened because the intention is to work with those systems in adapting their assessments to align with Common Core State Standards (CCSS).
- A weakness in this submission emanates from the implicit assumption that having an established assessment system is synonymous with having high quality assessments. These assessment systems may be the most established in the world, but no evidence is presented to demonstrate that they are the best models of assessment. In other words, evidence is not provided that these specific models do a better job of assessing student achievement than the current models of assessments used elsewhere.
- The submission is strengthened significantly because of the balanced approach provided in assessing across the high school program. These assessments go well beyond ELA and Math into Science, History, the Arts and Career and Technical programs.
- The Board of Trustees for the State Consortium on Board Examination Systems (SCOBES) is comprised of 2 members per state of which one must be the chief state school officer, which is evaluated as a positive even though this high level official can cede to someone else. Further, it is also a positive move in building support by having stakeholders choose the other member.
- The submission is significantly strengthened by committing states to implement the assessment program state-wide only if the subsequent evaluation shows a statistically significant gain in student achievement. Using a student output as an "acid-test" evaluation in moving from a pilot to full-scale implementation makes this a strong submission.
- While the submission establishes 10 states as the base, with each state required to involve 10 schools, the proposal is strengthened by allowing additional states to join with a commitment of only 5 schools but a requirement to be bound by all policies.
- A state (Kentucky) has been assigned the procurement role which is a positive because there is a lead state being held accountable by its laws, but there is no articulation of how the management organization will manage the funds which is a weakness.
- The process for making decisions is articulated and enhanced by outlining a process to require a super-majority vote of two-thirds of those members present. This facilitates a higher level of consensus than what would occur with a simple majority.
- A process is outlined for withdrawing from the consortium at any time, as well as a period of time for a state to "cure" a concern regarding a Memorandum of Understanding (MOU) commitment.
- The MOUs have all been signed by the required signatories in each state.

-- This section is evaluated in the high range at the mid level.

(B)(2) Theory of Action

	Available	Score
(B)(2) Theory of Action	5	5

(B)(2) Reviewer Comments:

- The Theory of Action is strengthened by recognizing that the CCSS aligned with assessments are insufficient to improve student performance without translating the content standards into performance standards and, then, having curricula put into place accompanied by instructional materials aligned with curricula. Eventually the curriculum must be improved to achieve improved student learning. Aligning with a globally recognized curriculum negates the need to re-design the curriculum, which can be a very costly exercise.
- The proposal is strengthened by the arrangements in place to alter board examinations to accommodate US outcomes, and the supplier can recover these costs to the participating states as they are incurred and tests are purchased for use by students
- A significant positive emerges by recognizing that student motivation to take challenging courses or work hard in school occurs when they are allowed to "move on when ready". In other words, having what students do in high school actually count toward moving on is a significantly positive shift in culture. This perspective is further enhanced by the submission's intent to avoid having the lower division exams serve as a tool to sort students out.
- The policy position is strengthened by recognizing that states are apprehensive about a single state curriculum and even more so with a national one, but that there is a willingness to adopt a common pass point evident in the theory of this submission.
- There is a substantial positive evident in that students passing the examinations outlined in this submission will be awarded a college-ready diploma, thereby mitigating the need for remediation in their selected pathway, and this is greatly enhanced by the policy that could accelerate college and career readiness by as early as the conclusion of the sophomore year.
- A time line for accommodating teacher professional development is identified commensurate with the grant requirement, albeit the type of development appears more related to the design of the program than on effective teaching.
- The submission is enhanced by outlining a transition methodology to accommodate students leaving grade 8 but not adequately prepared for grade 9 in this pilot. A weakness in the methodology is that it references additional time for catch-up without acknowledging funding aspects or potential implications on teacher contracts.
- Rigor is being addressed by aligning with examination systems that are recognized around the world for use in gaining entrance to top universities. This considerable strength is enhanced by designing lower division exams that will prepare students for success in upper division courses. Therefore, rigor is enhanced throughout the grade 9 to 12 program.
- Diversity of course offerings is also accommodated in an efficient manner. Pathways are achieved by using the lower level examinations to prepare for entry into specific pathways which, then, allows for choice into programs thereby qualifying students for appropriate College and Career Readiness (CCR). This positive feature is enhanced by removal of high school tracking systems.
- The commitment to include 40% high need students into the pilot is an additional strength because it allows for measurement in learning achievement for the full range of student population.

-- This section is evaluated in the high range because any perceived weaknesses are over-shadowed by the significant strengths incorporated into the theory.

(B)(3) Course Assessment Program Design and Development

	Available	Score
(B)(3) Course Assessment Program Design and Development	60	46

(B)(3) Reviewer Comments:

- The rationale for considering the courses that will be assessed is adequately defended by indicating that they are consistent with centuries of education programming and, therefore, continue to fall into the category of core programs.
- Adherence to rigorous standards in the grant's criteria is achieved in this submission by aligning with assessments used by leading universities in the world. In other words, unless rigor is at a high level, these universities will not use the results in student selection.
- A weakness in the design relates to the long-term control of the course material being assessed. The supplier is committing to accommodate United States (US) outcomes in their course packages and then building assessments for them. No public funds are expended on creating new courses and, therefore, these courses are not considered as being in the public domain. However, the model utilizes supply and demand principles and will succeed as long as the US education system is seeing improvement in student achievement, which is the focus of the vision and subsequent requirement of states to implement the pilot state-wide. Therefore, the weakness may be in perception only because no grant funding is expended on the course materials. Incorporating supply and demand into the project as an accountability component becomes a significant strength.
- A strength in this submission is evident in the commitment to go beyond ELA and Math and incorporate assessments in STEM and Career and Technical Education, and that working to align these with CCSS at the lower level is already underway.
- Accountability for quality programs in the upper level is enhanced by acknowledging that leading universities must recognize the validity of the standards in the assessments or students writing these tests will not be accepted into their programs. This is a strong quality control mechanism.
- The criterion for formative assessment is expected to be accommodated in the course materials offered by the test suppliers.
- The assessment program is an end of year assessment only without provision for through-course summative assessments. The proposal is weak in measuring student achievement growth, and would be strengthened with through-course assessments.
- SCOBES has a commitment from the test suppliers that data elements required in the grant can be accommodated. Student performance will be measured relative to calculated pass points, which will be comparable in all states.
- The proposal is silent on how SCOBES' teachers will be used in marking the assessments, although it indicates that the testing organizations use teachers to mark and that moderation strategies are utilized to ensure consistency in marking. It is a weakness in this proposal that there is no reference to how teachers in pilot schools will be engaged.
- There is recognition in the design for ensuring that assessment items will be varied and elicit complex student demonstrations or applications of knowledge and skills. That being said, there is no indication as to the methodology involved in marking written responses or performance assessments. Presumably, these assessments will be marked by the supplier, but there is no indication regarding their moderation strategies for ensuring consistency.

- Achievement growth reporting is acknowledged by SCOBES as being problematic in this proposal. Their definition on assessing growth in student achievement is that a post-measure requires a pre-measure; however, a weakness in their logic appears to occur in not recognizing that the previous year's summative assessment can become a pre-measure for the subsequent year's assessment.
- A difficulty and weakness relative to the grant is that an assessment scale is not utilized by the testing organizations.
- The submission is strengthened by addressing grant requirements regarding accommodations for special needs students. Processes used by several of the testing suppliers are outlined, and are consistent with high quality assessments involving all students.
- Evaluating this section entails consideration of the relative weightings of strengths and weaknesses. Some of these strengths are very significant and, therefore, the high range is selected with a low level identified within the high range.
- Recommendation: That SCOBES research the (b)(6) program, with its more than 100 years of experience, to research reasons why the correlation between well-written machine scored questions and written responses is so high, thereby reducing potential expenditures on assessments.
- Recommendation: That SCOBES research the degree to which teachers in the project utilize the formative assessments in the resources and the degree to which these are meeting teachers' needs.

(B)(4) Research and Evaluation

	Available	Score
(B)(4) Research and Evaluation	25	21

(B)(4) Reviewer Comments:

- The submission identifies an impressive group of psychometricians to conduct research on the various elements of good assessment.
- The research is strengthened by efforts to analyze the content of the courses as well as the level of cognitive challenge for success in college-level courses. Perceptions regarding cognitive challenge will be acquired from high school teachers, college instructors and from examination of the textbooks used in the courses. Triangulation to this extent is a significant strength.
- The submission accepts the efforts of the testing organizations in achieving validity, reliability and fairness because their tests are viewed world-wide as credible assessment tools, however, these aspects are enhanced by contracting with the National Center on Education and the Economy (NCEE) to determine comparability of the lower division tests with CCSS, and establishing a defensible and empirically supported set of criteria for college readiness in Math and ELA.
- Studies are scheduled for the duration of the project and enhanced by the use of control groups to determine effects. Further, surveys are planned to ascertain attitudes for both teachers and students making this research program a good balance of qualitative and quantitative data.
- The grant's criteria requests information on how planning will occur to ensure that assessments are being implemented as planned, but the submission is silent on this process likely because the testing program is world-wide and not open to variation. In other words, the process in this proposal is enhanced because it is already tightly controlled by the testing organizations and, therefore, this silence is not necessarily a weakness.
- The evaluation of this section is at a high range.

(B)(5) Course Assessment Program Implementation

	Available	Score
(B)(5) Course Assessment Program Implementation	45	39
(B)(5) Reviewer Comments:		
<p>-- Participation by students is voluntary which requires a significant "sell" by states. The strategies outlined to accomplish student interest are basically activities utilizing communication to parents and students regarding potential benefits. This aspect of the submission is evaluated as a weak positive because it maximizes student choice and, therefore, their interest, but minimizes control by the project leaders thereby making projections of student participation tenuous.</p> <p>-- The submission includes a plan of how the participation rates of schools and students will increase over the 5 years assuming that the evaluation results are positive and student achievement is improving. The submission's projections are responsive to criteria by forecasting enrollments for all of the 6 courses. The rationale for projections can be easily disputed; however, what a sceptic might seek to lower the optimist could increase. The check and balance to this project about requiring improved student achievement as the basis for continuing is the strength in verifying increasing projections.</p> <p>-- Schools are incentivized to participate by receiving a subsidy for the purchase of resources from the examination providers, which strengthens the submission.</p> <p>-- The project mentions application for additional funding through the Investing in Innovation Program (i3), which is deemed necessary if 100 schools within the 10 states are involved. In the event that this additional grant is not forthcoming, the project is reduced to 40 schools, which is still sufficient to conduct this research because it focuses on schools with diverse student populations. Nevertheless, linking this proposal to another grant introduces a risk simply because fewer schools are involved which, in turn, reduces the accuracy of generalizations possible from the project.</p> <p>-- From a risk management perspective, the quality of the data is not at risk in scaling up because the examination system providers are global whose product is always subjected to rigor in order to remain as a viable and credible business.</p> <p>-- Another positive in implementation occurs with the availability of teacher training programs which are all on-line and which have a proven track record.</p> <p>-- The submission is enhanced by outlining its belief that costs associated with going to scale actually creates a fiscal dividend rather than a problem. At the same time, the logic regarding the fiscal dividend is not presented in a clear, understandable fashion.</p> <p>-- The section's evaluation is consistent with the grant's criteria to outline "expected" participation rates as well as opportunities for training and, therefore, is rated in the high range.</p>		

(B)(6) Project Management

	Available	Score
(B)(6) Project Management	35	31
(B)(6) Reviewer Comments:		
<p>-- The Project Management Partner (NCEE) has its founding date included as well as the list of projects managed since its founding in 1987. Inspection of the list indicates that much of the work of the NCEE aligns very positively with this project. The potential for success is further enhanced by examining the degree to which previously managed projects have been successfully implemented.</p>		

- Potential for success is enhanced by NCEE's financial position which includes substantial reserve funds combined with no indebtedness. Therefore unforeseen situations can be quickly addressed.
- Personnel associated with NCEE have significant political experience, which is a positive and enhanced by people from both ends of the political spectrum. There are many philosophical issues in assessing student achievement which divide political leaders, and having people involved in the project from both ends of the political spectrum can reduce the potential for heading in unacceptable political directions which could derail this project.
- The financial manager for the project has the necessary credentials, and is experienced in managing the financial operations of NCEE for many years.
- A communications organization is identified, which brings credibility to the project because of its many years in full-service public relations.
- Consistent with grant criteria, project management personnel are listed with percentages of time allocated to this project, their roles and vitae.
- This submission is strengthened by having outside sources fund the Technical Advisory Committee (TAC) and research teams, leaving grant funds dedicated to external evaluations of pilot schools.
- Duties and responsibilities for the various groups identified in the project are clearly articulated, including the significant responsibilities for identifying a diploma and having the program accepted by higher education. Responsiveness to the grant criteria regarding major deliverables is detailed in the work plan, and major milestones are all evident in the submission.
- The submission indicates that it is impossible to calculate the replacement costs for assessments, which is understandable given how large the scope of the project is in comparison to what the grant may have anticipated.
- The human and non-human resources available for this project make this a strong section of the submission and, therefore, it is evaluated in the high range

Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.

	Available	Score
Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.	10	10

Competitive Reviewer Comments:

- The grant requires input from at least one IHE which is met in this project; however, it is not with respect to the activity of developing assessments as described in the grant. The unique approach of this project is premised on a belief that the assessments from the boards are world class, but the emphasis now needs to be on ensuring that STEM programs are rigorous for future needs. In actuality, this addresses the grant requirements.
- Assessments are in place for a full range of courses in both the lower and upper divisions, which exceeds requirements.
- A significant element in this project pertains to IHE's having reliable scores on assessments for them to consider during the student intake process.
- The project is strengthened by committing to design courses for all schools which are currently available in elite schools only.

-- This section easily meets grant requirements.

Competitive Preference Priority 2: Focus on Career Readiness and Placement.

	Available	Score
Competitive Preference Priority 2: Focus on Career Readiness and Placement.	10	10

Competitive Reviewer Comments:

- The project complies with the grant by referencing a different course than the one in competitive preference priority 1.
- Three career and technical courses are already identified that comply with the rigor requirement because they are already in use in over 100 countries. There is benefit in attaching to a process aligned with business needs that has already achieved recognition for its rigor in so many countries.
- Three national partners have consented to sit on a task force that will work to meet the grant requirement for community participation and support.
- The section complies with all of the grant requirements.

Absolute Priority: High School Course Assessment Programs

	Available	Score
Absolute Priority: High School Course Assessment Programs		Yes

Absolute Reviewer Comments:

- This proposal introduces efficiency by attaching to world renowned assessment systems which are required to meet the necessary rigor demanded by world renowned universities.
- These assessments will meet CCSS alignment because the test providers agree to incorporate standards not currently in their tests.
- The commitment by states to involve schools with high needs students ensures that this submission will address the range-of-students requirement, and addresses the requirements for accommodations.
- The requirement for teacher improvement is addressed through on-line programming currently used in other countries.
- Attaching student achievement to teacher and principal effectiveness is incorporated into the design.
- Assessments comply with the requirement to involve multiple courses, and will progress from pilot to full implementation if learning is significantly improved.
- This submission meets the absolute requirements stipulated in the grant.

Grand Total	220	188
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Budgets

Level 1 Budget

Name: Level 1 Budget(s)

-- The significant strength in this budget is that it does not have to fund content development or new costs associated with developing an assessment program from scratch.

-- A weakness in the methodology of the project is that it does not outline how the additional time for catch-up by students will be funded, albeit the budget indicates an amount of \$81,000 per school per year for the high-need schools but nothing for the regular schools. Given the number of courses involved as well as the traditional number of students struggling below grade level, this budget appears to be insufficient.

-- The project does not indicate budget ramifications to the administrative structure in the event that i3 funding is not forthcoming and the number of schools involved has to be reduced.

-- The budgetary aspects are enhanced by the participation of the Gates Foundation as well as financial support from NCEE itself. These funding sources ensure project viability even if the i3 grant request does not materialize. The budget table looks impressive with zeroes indicated for equipment, supplies and training stipends which can siphon away funds necessary for the more critical elements of the proposal.

-- The two budgets submitted both contain the same significant typo for "research" where the "M" is missing to indicate that it is "million". The addition of the entire budget is correct, however.

-- The amount of money budgeted to assist struggling students to pass after lower level courses is insufficient both in terms of the amount per school (e.g. \$14,000 in high needs and \$9,700 in regular) as well as the differential between high needs and regular schools.

-- The project allocates \$6.7M for administrative salaries without providing justification for what appears to be a top-heavy project management design.



Race to the Top

High School Course Assessment Programs Technical Review Form



Board Examination Systems Application #BES (b)(6)

(B)(1) Consortium Governance

	Available	Score
(B)(1) Consortium Governance	30	30
(B)(1) Reviewer Comments:		
<p>The State Consortium on Board Examination Systems (SCOBES) has an organizational structure based on a common set of operating principles that can support the implementation of proposed high school assessments. SCOBES will not create the proposed assessments; instead, it will select world-class existing high school course courses and associated Board Examination Systems and adapt them for use in a high school design. The proposed assessment system is intended to serve as a gateway to early enrollment in college and/or technical college degree programs and careers for high school students in the member states. All assessments in the program will be operational no later than the 2014-2015 school year.</p> <p>SCOBES is made up of 12 states, all governing states. To formalize their commitment to integrating and leveraging their resources to the proposed project, the 12 states have formed a 501(c)(3) not-for-profit organization (named SCOBES) and registered it in the District of Columbia with appropriate bylaws and articles of incorporation. A Board of Trustees comprised of members representing each member state makes policy for SCOBES, including setting goals and objectives and establishing the criteria for admission of states to the consortium or for removing a state from membership. Additionally, the Board of Trustees hires the President (and CEO if needed), engages the Project Management Partner and sets the budget for the organization. Decisions are made by majority vote.</p> <p>The commitment of member states is further substantiated in individual Memorandum of Understanding (MOU). Each member state agreed to building a common integrated system made up of a variety of certified high school courses and associated Board Examinations aligned with the Common Core State Standards, instructional materials aligned with the CCSS standards and the curriculum, examinations derived from the standards and curriculum, training for the teachers who will teach the courses, and external scoring and reporting systems. The lower division (freshman and sophomore) examinations will be set to the same pass score for English and mathematics. Of special significance is each member state's agreement, as stipulated in their respective Memoranda of Understanding, to make changes in their diploma requirements to enable the state to award a performance-based diploma to students who pass their lower division board examinations at the end of their sophomore year.</p> <p>Member states also agreed to engage the National Center on Education and the Economy (NCEE) as the Project Management Partner, and the state of Kentucky to serve as the procurement lead.</p>		

(B)(2) Theory of Action

	Available	Score
(B)(2) Theory of Action	5	5
(B)(2) Reviewer Comments:		

The Theory of Action of SCOBES clearly articulates paths to college and career readiness through the adoption of policies among member states focused on creating a new high school diploma for students who pass their lower division board examinations. These students will then be allowed to enroll as regular students in the 2-year and 4-year public open admissions post-secondary institutions of member states. Students who do not wish to pursue this enrollment in college can remain in high school and take a program in Career and Technical Education or enroll in one of the upper division (junior and senior) board examination programs, which are also designed to prepare students for admission into college.

As envisioned, the proposed system not only offers an alternative to the traditional time-based high school diploma, but also the potential to help raise students to a true college-ready standard. The reason for this is the Theory of Action's goal of setting the cut scores for the lower division exams to the actual cognitive challenge of the initial credit-bearing courses in U. S. open admissions 2-year and 4-year post-secondary institutions. Many of the programs under consideration, such as the International Baccalaureate Program and the Advanced Placement courses and exams, already have a record that supports this goal. All of the potential programs are integrated and coherent performance- and standards-based instructional systems focused on critical thinking, complex analytical skills, imagination and creativity, and the ability to apply knowledge to real world problems. They all employ a range of assessment techniques to serve both formative and summative purposes, and they all provide instructional support to both teachers and students. Some of these programs also publish prior-year exams and examples of the student work that receive high scores, so the standards are not a mystery for students, parents and teachers.

The Theory of Action also clearly places priority to improving learning and development for all students. The pilot phase of the proposed assessment system stipulates the participation of 10 high schools per state, 4 of which are to mainly serve high-need students. This is an important aspect of the Theory of Action. At one level, it ensures that participation of high-need students in high quality education is reasonably represented in each member state. At another level, it provides the comprehensive evaluation component of the Theory of Action with a means to validate the claim that the proposed Board Examination system produces statistically significant academic gains for all students who participate in it.

Finally, the Theory of Action recognizes the need to make the proposed courses and examinations accessible, affordable and effective by providing schools and districts with a broad spectrum of courses and assessments to encourage local choice options in determining what particular program best meets their needs.

(B)(3) Course Assessment Program Design and Development

	Available	Score
(B)(3) Course Assessment Program Design and Development	60	56

(B)(3) Reviewer Comments:

SCOBES will not be designing and developing new assessments, but rather adapting world-class high school courses and assessments already in existence for use among the member states. Each proposed Board Examination System will offer a core program covering at least English and mathematics at either the high school lower division or the upper division level, or both. In some cases the program offered will be a diploma program as defined by the provider, such as the International Baccalaureate Diploma Program. In others, such as the Pearson/Edexcel International General Certificate of Secondary Education Program (IGCSE), offered in 100 countries around the world, including England and Singapore, SCOBES will assemble a team of curriculum experts and teachers to define criteria to certify them as diploma programs by 2014-15.

In keeping with the Theory of Action, providers have committed to modify and adapt their course offerings and assessments to align them with the Common Core State Standards. SCOBES plans to conduct studies so that pass scores for the lower division exams are set to an empirically determined standard of college-readiness, and that all exams are fair, reliable and valid. Emphasis is also placed on ensuring that

the proposed system includes multiple methods of assessments to assure capacity to measure advanced thinking skills, creativity and innovation. This should not be difficult to achieve because almost all of the potential providers offer examinations mainly based on essay-type and constructed responses. To guard against the potential for reliability issues arising from the use of human raters to score essays and constructed responses, SCOBES will work with the providers to include selected-response, machine-scored questions in order to satisfy reliability requirements.

The proposal includes descriptions of the methods the potential providers employ for ensuring scalable, accurate and consistent scoring of their assessments. Lower division programs produce sub-scores on their examinations aligned with the topics or other major sub-divisions of the curriculum within the courses. The information can be shared with parents and students through report forms and systems that permit both aggregation of the data to the school and district level, the state and even prospective college and university admissions officials as well as disaggregation of the data by socioeconomic status and other categories. Diagnostic information is also available for students who do not pass their lower division exams, as is a wide range of student accommodations during assessments.

One area of the proposed system merits both recognition and monitoring. NCEE, the Project Manager Partner, is researching the math and English levels students need to achieve to be assured of success in the initial credit-bearing courses in the nation's two-year and four-year open-admissions post-secondary institutions. NCEE will use this information to establish comparable pass scores across all lower divisions exams offered in all member states. The use of such pass scores to produce data for every student about their performance relative to the pass scores basically ensures universal high school accountability. But it will also require continuous updates and revisions to maintain the currency and relevance of the pass scores.

An area where the proposal design is weak is in the production of measures to establish monitoring and reporting of student growth. The proposed system lacks pre-measures derived from assessments to accomplish this goal. SCOBES proposes to use what is measured by tests at the end of grade 8 and the curriculum students will be studying at the beginning of the 9th grade in the member states as pre-measures. This strategy, however, relies on expected correlated results that may have limitations as to the level of information they can provide as pre-measures since they are proxy measures and as such may be influenced by other factors that can bias or distort them.

(B)(4) Research and Evaluation

	Available	Score
(B)(4) Research and Evaluation	25	25

(B)(4) Reviewer Comments:

SCOBES's research and evaluation plan features a solid process to effectively address questions related to the quality and policy-relevant aspects of the proposed high school assessments. It has involved, for example, the participation of teams of psychometricians, cognitive scientists and literacy experts to establish the reliability, fairness and validity of the assessments. NCEE, the Project Manager, has engaged a team from the National Center for the Improvement of Educational Assessment to gather appropriate descriptive, technical and performance information and data on the 9th and 10th grade English and math examinations and courses offered by potential providers. This includes blueprints, rubrics, work samples, content constructs and cognitive demand as well psychometric properties associated with predictive validity studies, reliability evidence, test bias studies, and year-to-year score comparability studies. Attention is also paid to the operations elements of the provider systems, such as scoring and grading standards, reporting of results, moderation process for incorporating course work into the grading process, how test items are combined into a grade classification, how test items are weighed, and the current distribution of scores on each exam, including performance of key groups.

The research and evaluation plan also provides for comparisons of the content and the cognitive demand of each system with the Common Core State Standards. This will ensure a close examination of the extent to which the Board Examinations and the standards are compatible.

One important aspect of the plan is to secure the support of the higher education education community. The formation of a Higher Education Task Force to work with the Technical Advisory Committee of SCOBES is an effective strategy to accomplish this goal. It provides the ideal setting to validate the set of performance criteria for college readiness in mathematics and English as the basis for setting cut scores for the lower division examinations in these content areas. It also paves the way to ensure that the pass scores set for the lower division examinations are acceptable to the higher education community.

Another step in the right direction to gain the endorsement of the higher education community is the enlistment of a highly respected and authoritative research center to evaluate the predictive validity of the proposed system. SCOBES has enlisted the help of the University of Michigan's Institute for Social Research (ISR) to conduct ongoing evaluations of the level of success attained by schools adopting Board Examination systems. The evaluation will be based on comparing instruction and student outcome across treatment schools and 30 matched control schools (spread across the 10 Consortium states). ISR will also conduct parallel data collections in treatment and control schools, collecting four kinds of data over the course of the study: student surveys, teacher surveys, student post-program participation follow up, and having juniors take the PSAT and collecting SAT or ACT scores for all postgraduates who took either test. Results of these analyses will be reported twice annually for quality control and improvement.

(B)(5) Course Assessment Program Implementation

	Available	Score
(B)(5) Course Assessment Program Implementation	45	38

(B)(5) Reviewer Comments:

SCOBES plan is to implement the high school assessment program in two stages. In the pilot stage, it will implement the program in 100 schools in ten states, including 40 that primarily serve students in need. This stage assumes that SCOBES will successfully receive an i3 grant to provide for the participation of the 40 high schools serving high-need students. If the grant is not awarded, SCOBES will distribute the RTTT grant among 4 schools in each state, for a total of 40 high schools. In the operational stage, SCOBES expects the program to become statewide in the states in which the pilot took place, and then in other states that joined the Consortium over the next several years.

Such a program implementation plan will require a strong, broad base of support in every participating state. There are, however, several key features in the SCOBES plan that are likely to contribute to this end. First, each member state has agreed in their respective MOU to make changes in diploma requirements to enable the state to award a performance-based diploma to students who pass their lower division board examinations at the end of their sophomore year. All are committed to getting the necessary authority over the next year. Secondly, the Project Manager has already been meeting with a wide range of stakeholders in member states to help them frame the legislation or regulatory tools they will need to meet this requirement. Thirdly, no student will be required to participate in the program; participation will be voluntary. Finally, potential providers have provided assurances to align their offerings with the Common Core State Standards at their own expense. They expect to recover those expenses when selling their offerings to member states over the years.

Professional development is an area that the plan needs to be more specific. It is not clear whether member states will have a centralized resource center or clearinghouse to help facilitate collaborative learning and communication among educators participating in the programs, develop tools, share advice and best practices, and learn about exam administration procedures, score interpretation, and reporting of results. Furthermore, the plan envisions leaving professional development within the contexts of what each

potential provider offers. This has the potential to introduce differentials in the quality and amount of training educators will receive.

One recommendation that could enhance the professional development area is for the proposal to incorporate a professional development needs analysis among member states. This could be beneficial to both the providers and the member states, especially when considering the variety of courses and Board Examinations that are under consideration and the need to ascertain the type of teaching resources, including identifying the right human resources to teach the courses, that will be required.

(B)(6) Project Management

	Available	Score
(B)(6) Project Management	35	32

(B)(6) Reviewer Comments:

SCOBES has selected the National Center on Education and the Economy (NCEE) to be the Project Management Partner. Examination of NCEE credentials indicates that it has the management capacity and the expertise to bring the proposed high school Board Examinations project to successful implementation. NCEE, for example, has conducted an intensive program of international benchmarking on the world's most effective education and training systems, created the Commission on the Skills of the American Workforce (the 1990 Report served as the basis for legislation by the U. S. Congress), created New Standards in 1992 in tandem with the University of Pittsburgh, 26 states, 6 cities and 3 national foundations, to advance the state of the art in performance standards and high quality assessments, created America's Choice School Design Program in 1998 to identify designs for highly effective elementary, middle and high schools, with a focus on literacy and math interventions for middle and high school students who are more than 2 years behind, and established the National Institute for School Leadership (NISL), 2002, which has served over 3,800 principals in 14 states. Two states have adopted NISL as their primary school leadership program.

NCEE has allocated 8.6 FTEs and formulated a detailed work plan to support the project. The work plan includes detailed timelines, milestones and activities associated with eight major deliverables. For each deliverable, the plan carefully defines the goals and objectives, identifies tasks and how goals will be achieved, and determines timelines for completion. The end result is an integrated, cohesive plan that follows the development of the project in a sequential manner from its initial rollout plans for each state and its high schools to actual implementation to evaluation and communication with key constituency groups to share results.

The work plan takes into account the need to engage external expertise to ensure accomplishment of the Theory of Action. A subcontractor for communications and public engagement, for example, will supplement the staff allocations. There will also be close collaboration with a Higher Education Task Force on matters related to the college-ready standards to be used to set the pass scores for the lower division examinations and to help mobilize support for those standards in the states. Similarly, a Career and Technical Education Task Force made up of representatives of the U. S. Chamber of Commerce Institute for a Competitive Workforce and the American Association of Community Colleges will be assembled to assist in the design of a rigorous curriculum on career and technical education along with performance assessments.

While the proposed budget covers expected costs across the pilot and operational stages of the proposed system, it is very top heavy on administrative costs. On the other hand, the amount allocated (\$2 million) to cover the work of all teams conducting the various research studies required by SCOBES seems to be inadequate.

Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.

	Available	Score
Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.	10	0
<p>Competitive Reviewer Comments:</p> <p>SCOBES proposal does not provide a plan focused on preparing students for study in STEM-related fields as a way to support education that builds a highly-skilled workforce as the foundation for the 21st century knowledge-based economy. SCOBES does provide a process that involves input from a Task Force made up of prominent members of the STEM scholarly community and high school teachers of STEM subjects being assembled at Arizona State University. The Task Force would go through the course and examination catalogues of the Board Examination System providers and select from each group of upper division courses that would constitute a demanding, rigorous and coherent program of study in STEM subjects for all upper division high school students. This process has the potential to eventually lead to the type of plan required in this priority.</p>		

Competitive Preference Priority 2: Focus on Career Readiness and Placement.

	Available	Score
Competitive Preference Priority 2: Focus on Career Readiness and Placement.	10	10
<p>Competitive Reviewer Comments:</p> <p>SCOBES has also a strong focus on career readiness and placement in occupational areas. Its goal is to design at least three rigorous career and technical offerings in the upper division of high school offering courses. The courses and assessments will focus on high-demand occupational areas such as media, IT, and health care. The courses will comprise a rigorous course of study which, upon successful completion, will lead to industry-recognized credentials that are industry-driven, standards-based, portable, and connected to either jobs or the next level of training.</p> <p>SCOBES will engage the help of The American Association of Community Colleges, the U. S. Chamber of Commerce Institute for a Competitive Workforce, and career and technical education experts to participate in a Career and Technical Education Task Force to help define the courses of study and assessments. They will also provide support in determining adaptations that may need to be made to systems used around the world in order to fit the needs of American employers and educational providers.</p>		

Absolute Priority: High School Course Assessment Programs

	Available	Score
Absolute Priority: High School Course Assessment Programs		Yes
<p>Absolute Reviewer Comments:</p> <p>The State Consortium on Board Examinations Systems (SCOBES) addresses students' college and career readiness through the use of existing Board Examination Systems that come with high quality course syllabi and instructional materials, performance-based examinations, and training for teachers. Most of the systems under consideration are being used in virtually all of the world's highest performing countries. Passing these examinations, such as the Advanced Placement Courses, the International Baccalaureate Diploma Program, are gateways to admission to most of the top universities in the world.</p>		

SCOBES articulates paths to college and career readiness through the adoption of policies among member states focused on creating a new high school diploma for students who pass their lower division board examinations and allowing these students to enroll as regular students in the 2-year and 4-year public open admissions post-secondary institutions. Students who do not wish to pursue this enrollment in college can remain in high school and take a program in Career and Technical Education or enroll in one of the upper division (junior and senior) board examination programs, which are also designed to prepare students for admission into college.

To ensure that these systems measure student knowledge and skills against common standards, the potential providers under consideration are willing to modify them as necessary to reflect the Common Core State Standards. Furthermore, SCOBES plans to set the cut scores for the lower division exams to the actual cognitive challenge of the initial credit-bearing courses in US open admissions 2-year and 4-year post-secondary institutions, and updated regularly to maintain their currency and relevance.

Pending funding by i3, SCOBES is planning to pilot the proposed system in a way that makes possible reaching the broadest range of students. The pilot will involve 100 schools across 10 states. 40 of those schools will serve mainly high-need students. An operational stage will follow in which schools and districts will have the ability to choose from a broad spectrum of courses and assessments so that the system can be implemented at a scale that best meets their needs. Ongoing evaluations of the level of success attained by member states will provide evidence about the extent to which the proposal courses and assessments possess the expectations of rigor to adequately prepare students for college and careers.

Grand Total	220	196
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Budgets

Level 1 Budget

Name: Level 1 Budget(s)

While the proposed budget covers expected costs across the pilot and operational stages of the proposed assessment system, it is very top heavy on administrative costs. On the other hand, the amount allocated (\$2 million) to cover the work of all teams conducting the various research studies required by SCOBES seems to be inadequate.



Race to the Top

High School Course Assessment Programs Technical Review Form



Board Examination Systems Application #BES (b)(6)

(B)(1) Consortium Governance

	Available	Score
(B)(1) Consortium Governance	30	10

(B)(1) Reviewer Comments:

The application provides information about some key aspects of the consortium. A clear description of different types of roles states may take and the rights and responsibilities associated with these roles is presented. These roles and functions will enable each member state to collaborate on key aspects of the proposed program. However, the roles of all states, except for Kentucky, are limited to serving on Board of Trustees, voting on policy issues, piloting assessments, revising legislation in their states, providing data and implementing the system. These states are not involved in the actual process of design and development of specifications of the program. The rights and responsibilities of the Procurement Lead, Kentucky, include issuing the Request For Quotation (RFQ), reviewing proposals, managing the selection process, negotiating pricing, managing the purchasing list and participating in the certification renewal. These roles do not include hands-on involvement in design and development of the program. The application indicates

"The Consortium, with assistance from the Project Management Partner and the TAC, will establish criteria for organizations that wish to be certified as providers of Board Examination Systems. Some of these criteria will be mandatory. Others will be preferential."

It's not clear how the consortium will work on identifying these criteria. The application does not provide information about a governance structure component that will have a hands-on role on the design and development of assessment programs and related curricular, instructional and professional development aspects of the High School Course Assessment Program. The proposed plan indicates relying on the Technical Advisory Committee (TAC) and examination board providers. The degree of involvement of TAC (e.g., how often they will meet) is not described in the application. Therefore, the application does not provide information about a structure that will enable the successful design, development, and implementation of the proposed high school course assessment program. Section B1 of the application refers to Appendix F that presents an organizational chart that includes many committees. The roles and functions of most of these committees are not described in the application. For example, there is a Board Examinations Systems Specifications and Certification committee on the chart. The application does not describe membership or roles and functions of this committee. In fact, this committee is not identified as a responsible entity for any of the deliverables.

(B)(2) Theory of Action

	Available	Score
(B)(2) Theory of Action	5	1

(B)(2) Reviewer Comments:

The applicant does not provide a coherent plan that will result in improved academic outcomes for high school students across states in the consortium. The application proposes using existing Board examinations and their associated curricular and instructional programs and argues for the appropriateness of these programs based on their reputation. The criteria against which the assessments and other materials will be used to determine appropriateness are not presented. The application proposes to give schools/districts/states flexibility to choose different examination systems that may match their curricula and proposes a single pass point across participating states. However, a coherent explanation of how such a common pass point will be established is not provided. There is no mention of teacher professional development in the Theory of Action section. Even with excellent curriculum, instructional and assessment materials, improvement in learning cannot be expected without teacher professional development for implementation of the intended curriculum.

(B)(3) Course Assessment Program Design and Development

	Available	Score
(B)(3) Course Assessment Program Design and Development	60	15

(B)(3) Reviewer Comments:

Lack of plan for design and development. The application focuses on describing the capabilities of the potential providers such as ACT and College Board instead of describing what kind of assessments the consortium has designed and what will be expected of assessments that will be adapted from existing assessments by the providers. Therefore, section B3 of the application does not provide sufficient information about the design or the process for developing assessments specifically for the consortium (even though they may be based on existing assessments). The application states

“we do not propose to create new assessments, but rather to adapt existing world-class courses and assessments for the purposes described above. There is no purpose to be served by describing these courses and assessments as if they existed only in the mind’s eye, when we can be much more concrete. And so what you will find below are responses to the questions that are asked in this section framed in terms of the characteristics of the kind of courses and assessments we will actually use. As we have said above, when the time comes to do so, we will publish our criteria for certifying Board Examination Systems and we will entertain proposals from any organization that wishes to offer Board Examination Systems that they believe meet those criteria. But here, in the interest of concreteness, we will offer examples culled from some of the best candidates we are aware of.”

In the underlined part, the application indicates that it will publish criteria for certifying Board Examination Systems at an unspecified time. However, for the purposes of evaluating the consortium’s plans the time is *now* in the application. Many of the sections refer to good reputations of organizations indicating the consortium’s trust that the quality and specifics of the assessments will meet the needs of the consortium. If the consortium has not developed specifications for these assessments, it is hard to imagine what their criteria will be based on.

Lack of clarity of plans. The lack of clarity of the plans is evident in many parts of the application. The plans for selecting courses and examinations from examination board providers is explained as

“We will assemble a team of curriculum experts and teachers to review the offerings from each provider selected by our procurement process to examine their courses and examinations,select from

them a set of required and elective courses to make a complete core curriculum for the lower division, and specify the adaptations required for their use in Consortium states and schools. These adaptations will be made at the expense of the providers. "

The process of reviewing each provider's offerings and picking and choosing from what they have, have several problems associated with it. First, it is not clear how a selection will be made among providers, in other words what the selection criteria will be. Second, this process assumes that offerings will have enough overlap with the common core requirements and that new assessment components will not be needed. Overall, this process makes the important specifications of courses and assessments secondary to what already exists and is offered by the providers, and does not indicate a thoughtful approach to designing courses and assessments that will raise standards and improve learning in US secondary schools.

Course materials and professional development program. It's not clear what the consortium means by course materials and related professional development programs. For example, the statement below refers to course materials and related professional development programs, but these are not explained anywhere in the application.

"The great advantage is that our schools will have available to them far more course materials, assessments and related professional development programs than could ever have been produced from scratch for the \$30 million made available for the High School Course Assessment Program, and those materials will be constantly refreshed at the providers' expense for years and years to come."

In B3 and in other sections of the application the information about course materials and professional development programs are limited to their existence within the examination board offerings. The descriptions of these courses or professional development programs are not presented, in particular, their alignment to assessments are not discussed.

Achievement and growth data. There is not sufficient data about how achievement scores that indicate performance with regards to common core standards will be established. Two key aspects of these scores are not explained. First is how they will be linked to common core curricular standards. The second is if several different tests from different examining boards are used, how comparability of scores from these different boards will be created. The application refers to "pass points" but does not explain how these pass points that are comparable across different tests will be established. The application also refers to scores providing information about college- and work-readiness but does not explain how these scores will be created.

Growth scores that the application is proposing are problematic. First, the application indicates that two measures that measure the "same learning domain" can provide pre- and post-test information that can be used to estimate growth. Estimating growth requires the two tests to measure the same competencies, with similar levels of reliability and the score scales from the two tests to be linked. The application proposes to use "grades" for mathematics, for example for grade 8, and those for grade 9 to estimate growth. Scores that are not linked cannot provide comparable information across years. Therefore, the proposed method for estimating growth scores is problematic.

Assessment of ELs and SWDs. The application's plan for assessing ELs and SWDs is equally problematic. Instead of having a plan for assessing these student groups, the application describes how Cambridge International Examinations assess English as a Second Language (ESL) students, and for accommodations, the application refers to extra time allowance, provision of especially adapted exams and

assistance with reading and writing. The language and learning contexts of ESL students who take Cambridge International Examinations, who are students from different countries, are different than those of EL students in the US. The same courses or examinations systems for ESL in the Cambridge University Examinations context should not be assumed to be appropriate for ELs in this country. What College Board and Edexcel offers are described similarly. These descriptions do not present a clear plan for how the consortium will address assessment of ELs and SWDs within the context of the US education system.

(B)(4) Research and Evaluation

	Available	Score
(B)(4) Research and Evaluation	25	15

(B)(4) Reviewer Comments:

The research and evaluation plan includes gathering data that will help examine validity, reliability, and fairness of the assessments. These include exam blueprints, instruments, rubrics, work samples and syllabi, psychometric properties of assessments including predictive validity studies, reliability evidence, results of test bias studies, and year-to-year score comparability studies. The proposed data and analysis are appropriate and necessary for ongoing investigation of the properties of the assessments.

Evaluation includes appropriate plans for examining both the quality of the implementation process as well as the impact of the proposed program on instructional practices and student outcomes. The evaluation of patterns of implementation support and success in all schools adopting the Board Exam systems will be conducted using data on school funding, staffing, enrollment, student composition, student achievement on state tests, and other data in state administrative databases. Student outcome data will include PSAT/SAT/ACT scores across treatment and control schools. These scores are commonly used for university/college admissions criteria. Therefore, they do provide some indication of college readiness. These performance indicators, however, are weak predictors of university/college success. This weakness was not acknowledged in the application.

Compatibility of the lower division Board Examination Systems with the new Common Core State Standards and comparability with each other. The application does not provide details about the proposed plan for compatibility of the lower division Board Examination Systems with the new Common Core State Standards and comparability with each other. They have plans to have TAC conduct comparability analyses that will focus on the correspondence of each exam with its counterparts as well as each separately with the Common Core. Without any details about the compatibility and comparability investigations, it is not possible to evaluate how effective these plans will be for adopting courses and assessments that will be well aligned with common core curricula and the level of comparability with each other.

Setting performance criteria for college readiness. The consortium is proposing an approach for setting performance criteria that has not been used and tested before. It seems too risky to leave the determination of performance standards to a new method only. The application indicates that the TAC will develop a process for weighing the varied evidence in developing cut-scores. A new procedure for establishing cut scores can be developed but TAC would need time to develop such a procedure. In addition, the developed procedure will need to be tested before it can be used in the proposed program. Without evidence of its accuracy and effectiveness, it is not possible to judge the reliability and validity of

the performance level scores. The current plan does not include gathering such validity and reliability evidence.

(B)(5) Course Assessment Program Implementation

	Available	Score
(B)(5) Course Assessment Program Implementation	45	11

(B)(5) Reviewer Comments:

Promoting participation. Overall, the tone of the application is not one of *promoting* the program so that districts and schools would be interested to participate. Instead, the application uses language such as “getting districts and high schools to agree” and “persuading parents and students to sign up for the program”. The plan for promotion of the program includes dissemination of information to the education community through the consortium web-site, press releases, and presentations at the national meetings of all the major governance and education bodies and associations, and presentations and articles in professional organization outlets. None of these promotion strategies are directed at students, parents and schools, which are the stakeholders who will be making the choice about participation.

The consortium expects school participation to grow at a rate of 50% each year. No evidence-based rationale is provided for this expectation. This estimate may be too high or too low. The prediction of participation starts with 10 schools in each state and predicts equal number of schools per state in the years to come until 2018. Therefore, the predicted percent participation is as high as 74% for small states (such as Vermont) and as low as 5% for large states (such as New York). Equal number of school participation in a long-term prediction does not seem reasonable. If the program is successful, larger numbers of schools in larger states would be expected to participate in the program.

Currently, the consortium has 80 LEA’s indicating support for the program. Since the program needs at most 100 schools for the piloting stage, the consortium has support from a sufficient number of LEAs for the piloting stage.

Supporting teachers and administrators in implementation. The consortium does not present any plans to support teachers or administrators in the implementation of the program. The application refers to the presence of online training sessions for teachers from potential providers (such as ACT and Cambridge Examinations). This plan leaves the success of the program in the hands of the providers. In particular, training of the school administrators who may play significant roles in coordinating, managing and providing leadership for multiple course/assessment programs within their schools is missing from the plans presented in the application. Preparedness of teachers and principals for implementing the course/assessment program is critical in particular because of the expectation for student performance outcomes to inform teacher and principal effectiveness. Overall, even though the application proposes to evaluate the overall implementation process, no ongoing quality control procedures, such as the degree to which the examination providers are implementing the program in a satisfactory way, are presented for the implementation of the program. An ongoing quality control process can provide the consortium with information about challenges, problems and issues that can be used to revise procedures and address problems. Such a process is missing from the application.

(B)(6) Project Management

	Available	Score
(B)(6) Project Management	35	9

(B)(6) Reviewer Comments:

Quality, qualifications, and role of the project management partner. The information presented in the application indicates that key personnel in the project management partner NCEE are highly qualified for taking on the large project proposed in the application. NCEE has created and played leadership roles in large high-profile education initiatives such as the New Standards and the America's Choice. The experiences of NCEE include development of new initiatives, working with large numbers of states, school districts and school, leadership development in schools, and research activities. Members of the management partner will bring extensive experience to chairing or leading the Board of Trustees, Research and Policy Development, State Services, Financial and Administration aspects of the program.

The project work plan and timeline. The consortium has created a governance structure that allocates key responsibilities to different groups, committees and task forces. These include NCEE, a contractor for communications and public engagement, NCIEA to work with the TAC for conducting research, A Higher Education Task Force, A STEM task Force, A Career and Technical Education Task Force and the Board of Trustees. Each of these units will address essential components of the program. Eight deliverables are identified and a schedule with start and end dates, associated tasks and the responsible entity are presented. These are consistent and coherent with the Theory of Action presented in the application.

Some key elements are missing from this work plan. These are (1) a plan for quality control for assessment development, implementation, professional development and services provided to schools; (2) a set of criteria for the assessments to be acceptable for the goals of the program; (3) a plan for teacher professional development; (4) a convincing promotion program to gain support from the public, parents, students and teachers. These are essential for the success of the program, yet they are not explicitly addressed or prioritized in the application.

Budget. The consortium has been successful in obtaining substantial amounts of additional funding from the Bill and Melinda Gates Foundation to supplement the funds that will be available from RTT. The budget is presented by year and budget category such as Personnel, Travel etc. Some details by each budget category are provided. Overall the information presented gives a big picture idea about how the funds will be used, but does not make it possible to make judgments about the reasonableness of costs. Where some details are provided, some problems can be identified. The personnel costs are presented as \$6.7 million, approximately 10% of the total budget, for four years. This amount is to be paid to 10 NCEE staff, for management. Base salaries for some of the key NCEE staff are very high (b)(6) year for the director). The leadership of the highly qualified individuals cannot be underestimated. However, the base salaries for the majority of the NCEE personnel are extremely high, especially when contrasted against the amount allocated to other components such as \$4.4 million for struggling students, \$2.7 million for state coordination, and \$2 million for research.

Plan for how the State will fund the assessment program over time. The application states the plan for how the states will fund the assessment program over time as follows:

"The entire cost of the core academic program will be completely offset after the first three years implementation in a school by the reduction in high school costs produced by high school students leaving early to enroll in college after their sophomore or junior years."

This plan has two key problems. First, the sustainability of the program is based on an untested assumption that students will want to or be able to leave high schools early. Not only has the consortium not tested this assumption, but it has also not provided a convincing rationale for why students will want to leave high school early. The second problem is that the overall goal of the program is to improve education by raising standards for all students. Raising standards, as well as shortening the time frame for students to achieve what they are not used to achieving in the past does not seem feasible.

Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.

	Available	Score
Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.	10	0
Competitive Reviewer Comments:		
<p>The application does not provide a separate plan that describes (1) the courses for which assessments will be developed; (2) how the courses comprise a rigorous course of study that is designed to prepare high school students for post secondary study and careers in the STEM fields. Instead, it proposes to designate Dr. Michael Crow, president of Arizona State University, to assemble a group of academics and teachers in STEM areas to work on <i>selecting</i> rigorous courses from catalogues of the Board Examination Providers (College Board, Cambridge Examinations, etc.). No details, such as how rigor will be defined and identified and how curricular match will be addressed, are presented about the actual process of selection. In addition, it is not clear whether this same group will select the examinations. Selection of examinations and courses that are not matched will lead to an incoherent program. In addition, given the potential for adoption of different examination systems in different states, no details are provided about how the process of rigorous course selection will be structured to take into account these differences and representation of states in the selection process.</p>		

Competitive Preference Priority 2: Focus on Career Readiness and Placement.

	Available	Score
Competitive Preference Priority 2: Focus on Career Readiness and Placement.	10	0
Competitive Reviewer Comments:		
<p>The application presents a plan for developing assessments for high school courses in career and technical education. This plan lacks sufficient specificity and details to be considered high-quality. The consortium has identified existing systems of technical qualifications that can be adapted to the US context. They have also identified three national partners representing the business community. The proposed plan is to work with these national partners in identifying a sequence of courses that may include engineering, media, IT, healthcare and green jobs (including energy provision). These are appropriate and necessary steps for identification and development of quality programs and assessments in career and technical education. But proposed plan is insufficient for ascertaining a process that will lead to selection and/or development of</p>		

quality courses and assessments in career and technical education. For example, details about how rigor will be defined and identified and how curricular match will be addressed in the process of selection are not presented. In addition, it is not clear whether this same group will select the examinations. Selection of examinations and courses that are not matched will lead to an incoherent program. In addition, given the potential for adoption of different examination systems in different states, no details are provided about how the process of rigorous course selection will be structured to take into account these differences and representation of states in the selection process.

Absolute Priority: High School Course Assessment Programs

	Available	Score
Absolute Priority: High School Course Assessment Programs		No
Absolute Reviewer Comments:		
<p>The proposed plan for developing assessments for high school courses that will be used by multiple states does not meet the Absolute Priority requirements for the reasons described below.</p>		
<p>(a) (i) Lack of evidence or detailed plans for establishing the match between college- and career-ready standards and the proposed examinations and courses;</p>		
<p>(ii) Lack of plans for evaluating the degree to which assessments are capturing complex student demonstrations or applications of knowledge and skills;</p>		
<p>(iii) Lack of plans for developing or evaluating the degree to which performance results across several different examinations can be combined to evaluate teacher and principal effectiveness within an education system (school or district) and lack of plans for creating scores that will represent change/growth</p>		
<p>(iv) Insufficient plans for assessment of ELs.</p>		
<p>(b) Proposed small scale program (as few as 4 schools per state in 10 states) is not expected to make a significant improvement in student achievement statewide.</p>		
<p>(c) Lack of definition of rigor in certification criteria</p>		
<p><u>Absolute Priority Requirement under (a)</u></p>		
<p>(i) <i>Measuring student knowledge and skills against standards.</i> The application proposes using existing Board Examinations and their associated curricular and instructional programs and argues for the appropriateness of these programs based on the reputation of the high standards in these programs. The criteria which will be used to determine the appropriateness of the assessments and other materials are not presented. Second, this process assumes that examination board offerings will have enough overlap with the common core requirements and that new assessment components will not be needed. No plans are presented for developing new assessments if the examinations do not match well with the standards.</p>		
<p>(ii) <i>Assessing complex cognitive competencies.</i> The application refers to inclusion of assessment tasks that are cognitively demanding. However, no specific verification procedures, such as cognitive labs or think aloud procedures, are proposed to empirically examine and demonstrate the cognitive complexity of the proposed assessments.</p>		
<p>(iii) <i>Achievement and growth scores to inform evaluations of principal and teacher effectiveness, and inform teaching, learning and program improvement.</i> There is not sufficient information about how achievement scores that indicate performance with regards to common core standards will be established. Two key aspects of these scores are not explained. First is how they will be linked to common core curricular</p>		

standards. The second is if several different tests from different examining boards are used, how comparability of scores from these different boards will be created. The application refers to a common "pass points" but does not explain how these pass points that are comparable across different tests will be established.

The application is proposing an approach for setting performance criteria that will be indicators of college- and work-readiness that has not been used and tested before. It is too risky to base performance standards solely on a new method that has not been examined and tested. Without evidence of accuracy and effectiveness of a new cut-score setting procedure, it is not possible to judge the reliability and validity of the performance level scores. The current plan does not include gathering such validity and reliability evidence.

Proposed methodology for developing growth scores is problematic. First, the application indicates that two measures that measure the "same learning domain" can provide pre- and post-test information that can be used to estimate growth. However, estimating growth requires the two tests to measure the same competencies, with similar levels of reliability and the score scales from the two tests to be linked. The application proposes to use "grades" for mathematics, for example for grade 8 and those for grade 9 to estimate growth. Scores that are not linked and possibly coming from different examination systems cannot provide comparable information across years.

Given the problems described above, the plans proposed in the application do not have sufficient specificity and detail and verification procedures to ascertain that the assessment program will result in scores that can be used accurately and meaningfully to inform teacher, principal and school effectiveness evaluations.

The application gives very little attention to improving instruction and learning. Educational improvement is closely tied to teachers using assessment information appropriately to make changes in their instructional practices. Similarly, principals can play a key role in improving instruction and learning by providing leadership in setting targets for schools and monitoring progress. In the application, teacher professional development plans are limited to online training sessions for teachers from potential providers (such as ACT and Cambridge Examinations). Training of the school administrators is missing from the plans presented in the application. Currently, these necessary elements (preparedness of teachers and principals) for improving instruction and learning are not sufficiently addressed in the proposed plans. Therefore the proposed plan does not meet the Absolute Priority regarding improving instruction and learning.

(iv). Assessing the broadest possible range of students, including English learners and students with disabilities. The application's plan for assessing ELs and SWDs is problematic. Instead of having a plan for assessing these student groups, the application describes how Cambridge International Examinations assess ESL students, and for accommodations, the application refers to extra time allowance, provision of especially adapted exams and assistance with reading and writing. What College Board and Edexcel offers are described similarly. These descriptions do not present a clear plan for how the consortium will address assessment of ELs and SWDs within the context of the US education system. In particular, the plan for using tests developed for ESL students from different countries by different examination boards is not an appropriate way of addressing assessment of diverse ELs in the US who have different language backgrounds and issues than ESL in the UK or other parts of the world. Therefore, the proposed plan does not fully meet the Absolute Priority requirement regarding assessing ELs and SWDs.

Absolute Priority Requirement under (b)

Includes assessments for multiple courses that will be implemented in each member State at a scale that will enable significant improvements in student achievement outcomes statewide. The application proposes inclusion of 4 or 10 schools (depending on whether the consortium receives 13 funding) per state for 10 states. This means that at most 100 schools will be participating in the proposed program. Student

participation is voluntary, therefore, all students from these schools cannot be expected to participate. In the initial four year grant period, even if the program has a positive impact, this impact will be on a small number of schools and students.

Absolute Priority Requirement under (c)

Includes a process for certifying the rigor of each assessment in the assessment program and for ensuring that assessments of courses covering similar content have common expectations for rigor. The application does not provide details about the proposed plan for certifying rigor. The consortium has plans to have their TAC to review the assessment and course materials but they present no specific criteria or process regarding how they will verify and examine rigor in each examination and similarity of rigor across examinations considered to be adopted by the member states. Therefore, the proposed plan falls short on meeting this Absolute Priority requirement as well.

Given many gaps and problems in the proposed plan, the assessment program cannot be expected to meet fully the expected levels of reliability, validity and fairness for their intended purposes.

Grand Total	220	61
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Budgets

<p>Level 1 Budget</p> <p>Name: Level 1 Budget(s)</p> <p>The consortium has been successful in obtaining substantial amounts of additional funding from the Bill and Melinda Gates Foundations to supplement the funds that will be available from RTT. The budget is presented by year and by budget category such as Personnel, Travel etc. Some details by each budget category are provided. Overall the information presented gives a big picture idea about how the funds will be used, but does not make it possible to make judgments about the reasonableness of costs. Where some details are provided, some problems can be identified. The personnel costs are presented as \$6.7 million, approximately 10% of the total budget, for four years. This amount is to be paid to 10 NCEE staff, for management. Base salaries for some of the key NCEE staff are very high (b)(6) year for the director). The leadership of the highly qualified individuals cannot be underestimated, however, the base salaries for the majority of the NCEE personnel are extremely high, especially when contrasted against the amount allocated to other components such as \$4.4 million for struggling students, \$2.7 million for state coordination, and \$2 million for research.</p>



Race to the Top

High School Course Assessment Programs Technical Review Form



Board Examination Systems Application #BES (b) (6)

(B)(1) Consortium Governance

	Available	Score
(B)(1) Consortium Governance	30	18
(B)(1) Reviewer Comments:		
<p>The Consortium's vision and goals seem well-aligned with the stated theory of action. However, the role and key deliverables do not seem as well aligned with the theory of action due to (i) what could be a fairly limited scale of deployment, and (ii) the ownership of the deliverables.</p> <p>In regard to (i), it appears that without the additional i3 funding and within the scope of the time duration and funding of the RTTA award, the Consortium is committing to deploy in at minimum four high schools per state, in 10 states, by the final full academic year of 2013-14. Even with the i3 funding, deployment within the duration and funding of the final full academic year of the award seems to be only 10 high schools per state.</p> <p>In regard to (ii), the proposal confirms that product development is expected to be based primarily on existing products and thus ownership of the assessments will likely reside with the product developers. Thus these are not part of the deliverables and will not be able to be used broadly across schools without substantial ongoing funding, within and after the duration of the funding here.</p> <p>All states are described as Governing States and Memorandums of Understanding are included. There appear to be two tiers for state participation, plus the specification of one state as the procurement lead state. The differentiated roles of the tiers and state involvement are reasonably well described. The Consortium's proposal includes reasonable procedures for entering and leaving the Consortium. The plan for managing funds is through the project management group and the procurement state. Procurement policies seem reasonably well specified but the management of funds role between the NCEE and the procurement state is not clear regarding who is the lead on fund management.</p> <p>State representation in the decision-making process is present but could be limited based on the procedures specified. The not-for-profit SCOBES does include two-member representation for the states on the Board of Trustees. However, the Executive Committee of the Board is small and does not necessarily include representation from the states. Also, a consortium-based Nominating Committee will both nominate each state's second member and nominate most members of the Executive Committee. Specifications do call for the Nominating Committee to be selected by the board, but these specifications do not state whether it is the Executive Committee alone appointing this key committee or the full Board of Trustees selecting the Nominating Committee, nor does it fully describe the composition of the Nominating Committee.</p> <p>A set of key definitions to which all states will adhere as called for in this section of the NIA do not seem to be specified, nor is there a clear rationale fully described for specifying or developing such a set of definitions.</p> <p>The Technical Advisory Committee, which will supervise a process for setting standards of college readiness on lower division examinations in this proposal, includes distinguished professionals in assessment and measurement.</p>		

(B)(2) Theory of Action

	Available	Score
(B)(2) Theory of Action	5	2
(B)(2) Reviewer Comments:		

The proposal does incorporate approaches to developing and/or deploying common standards, assessments, curriculum, instruction and professional development. It does correctly point out the robustness and rigor of board examination systems such as AP and IB. It also points out that such programs can supply many courses and that their assessment programs have been demonstrated over time.

The Consortium's theory of action is logical but large. The extensiveness of the changes needed in the board examination systems described here are considerable to meet the needs of this proposal. The consequences should the approach be fully deployed to all schools within a state and including the broadest possible range of students are not coherently and credibly addressed in the proposal. It is not clear that at scale they will result in improved outcomes for high school students. This is because the robustness and rigor of such curricular systems are based on standards much beyond both recent high school standards used in many of the states *and* the common core. A key question not addressed here in a coherent way is how such systems can be used to include the broadest possible range of students. It is not enough to simply state that the standards will be adjusted: If standards are adjusted substantially closer to what high schools might be able to support within this proposal, a question arises as to what extent is the track record of rigor and robustness retained, given that the assessments have been validated for a different purpose.

Furthermore, while accommodations are included in the assessment systems, this is only a very small aspect of how the total proposal would need to support students for successful broad participation. Extensive needs would be present not only in special education but also for general education students. Instructional supports in the proposal do include mentions of individualized learning programs to help students participate in these programs, but these are not well described, developed, researched, or well funded in the program.

Other supports for broad participation not coherently addressed in this proposal but necessary for the theory of action include choice-making by students and their families among the high school paths, which raises concerns of equity and fairness for students in making choices, especially given the diverse backgrounds of students and their families. The proposal does not describe how school counseling for such choices would occur.

Additionally, agreements from Institutions of Higher Education that they would accept a much larger percentage of minors entering college after only two years of high school study are not included in this proposal. Yet the ongoing funding that supports the theory of action shown here is based on cost savings to high schools from shifting these students to universities sooner.

If not deployed at scale and accessible to a broad range of students, then the program theory of action suffers from this as a drawback in scope and scale to bring about substantial learning gains statewide, as called for in the Absolute Priority.

(B)(3) Course Assessment Program Design and Development

	Available	Score
(B)(3) Course Assessment Program Design and Development	60	25
(B)(3) Reviewer Comments:		
<p>The design and development of the high school assessment program seems not feasible, scalable or consistent with the theory of action due to the concerns described in B2, such as scale size, impact, and accessibility.</p> <p>It is feasible that a select number of board examination programs might be willing at their own cost to modify assessments for alignment with the common core standards. This would be in their broader interest within the U.S. because it would better align their programs with U.S. education directions, regardless of whether or not this Consortium's proposal is implemented. Producers that are widely deployed in the U.S.</p>		

such as AP and IB are also working with courses already aligned to receive college credit, and thus these courses and assessments tend to include a high degree of opportunities for higher order and skills/knowledge, such as represented in the common core standards. An assessment blueprint that indicated representation of the common core standards likely would not be difficult to create, nor seem to require a large modification of the materials and assessments, for at least some of the examination systems discussed. Number and types of components, varied elicitation, accuracy and consistency of scoring, assessment accommodations and other specifics of the test characteristics cannot be fully described in this proposal, because a range of systems could be adopted. These seem reasonable *within the context and purpose of current course offerings such as AP and IB* given the nature of the prior work of these systems.

However, part of what makes the proposal less feasible or scalable is how these courses could include a broad participation of students, as described previously. No feasible plan has been presented to show how these programs could be widely deployed and instructionally supported at all high schools, and financed on an ongoing basis from funds that depend on cost-savings from large numbers of students moving to higher education.

Note that while the proposal does state in several places that the states would be bound to implement across the state for all schools where research found statistically significant gains, it appears that (i) all schools does not mean a broad participation of students or specify what degree of implementation at each school, for instance implementation at all schools but only for current AP and IB classes seems as if it might be sufficient under the requirements here, and (ii) the implementation phase is after the duration of the proposal. Since in this proposal there is limited ongoing product to be used by schools without additional funding after the project duration, as well as the other concerns described above, it seems states might have limited incentive to remain in the Consortium at the end of the funding duration, if scale size and impact for the project requires deploying to a broad participation of students and to many schools in the state.

(B)(4) Research and Evaluation

	Available	Score
(B)(4) Research and Evaluation	25	16

(B)(4) Reviewer Comments:

The plan for research and evaluation seems to include a number of studies that would be informative, but it also seems to neglect some of the over-riding concerns as described in B2 and B3, including the broad participation of students, the way in which the college-credit bearing purpose of programs such as IB and AP can be reconciled with the theory of action in this proposal, and the likelihood of reaching scale of the project required for the theory of action. Such concerns should be anticipated and addressed *in advance* with a credible plan, rather than waiting to be revealed in the research and evaluation stage.

Additionally, a major concern not fully addressed by the research and evaluation section, nor in the prior sections on assessment design and development, involves growth data, and how these could be produced by the system, both within and between schools. First, it is not clear that sufficient access to data would be available, such as universal identifiers for students, teachers and principals. There is limited discussion in the proposal to indicate awareness of and a process to address such state barriers. Secondly, a more systematically structural problem arises for growth data that can be used in this proposal due to the variability of examination systems that might be in place. Finally, use of the information to inform evaluation practices for teachers and principals is not addressed sufficiently in the research and evaluation section to understand how this might be possible, especially given the variability in programs and the numbers and populations of students who may voluntarily decide to enroll in such programs, within and across schools.

The studies listed have some admirable aspects but are hard to understand in terms of overall intent and design. The major research questions and how each study will contribute to answering each question are unclear.

Evaluation does include an strong selection for external evaluator. The Technical Advisory Committee includes considerable expertise in measurement and assessment.

(B)(5) Course Assessment Program Implementation

	Available	Score
(B)(5) Course Assessment Program Implementation	45	20

(B)(5) Reviewer Comments:

Voluntary program participation is described in this proposal, as it states no student will be required to participate. However, the proposal does not include sufficient information on plans for promoting participation to well judge (i) how many students might be interested, and (ii) how many of these would be students not already likely to participate in programs at the school such as AP, IB or honors courses. A figure of 30% of students at start of project and 5% growth annually is shown but not supported in the proposal, and the source or basis of this estimate is not provided.

A timeline and activities are specified for implementing the system, however the timeline completes only small scale implementation through the duration of the funding and this does not support the assertion that a large number of schools and students will implement the assessment by the 2013-1014 school year. Expected participation levels at least by school, and therefore for total students served in the state, for the duration of the funding period are specified, but not well supported, as described above. The numbers seem low relative to the intended impacts described in the theory of action.

The plan for supporting teachers and administrators seems primarily to consist of drawing on the supports already in systems such as AP and IB. Some of these systems do offer reasonably strong supports for teachers, and sometimes but not always for program administrators, such as the school's IB coordinator. However, these supports are in place regarding the current configuration of college-credit replacing high school courses, which is not the purpose or scope of the program described here. As described above, what the plan would be for supporting teachers and administrators if these courses were to be used for broadest possible participation across the school and involve such aspects as counseling for a two-year diploma are not well described.

(B)(6) Project Management

	Available	Score
(B)(6) Project Management	35	15

(B)(6) Reviewer Comments:

The quality and qualifications of the project management partner seem reasonably appropriate, although the project management partner does not seem to have implemented at the scale of this project previously in regard to such aspects as full-state coverage over the range of courses identified, with the complexity of the various diplomas to be offered, ranges of choice for students, and support of teachers, counselors and administrators to implement this system.

Pay rates for some of the senior officers seem extraordinarily high. Another key aspect to note in the budget is that the already quite limited access and scope of the project for states is reduced even more so when considering the actual available dollars should this project be funded. Much of the 10 schools per state cost is being provided by the hypothetical i3 grant funding. It seems that only 4 schools per state

would be supported with board examination systems, curriculum, and professional development during the duration of the grant through funding on this project.

The project work plan and timeline do not well account for some of the needs discussed in other portions of this review, such as a credible plan for inviting, encouraging and supporting the broadest possible participation of students and reaching sufficient scale within the project funding and duration to support the theory of action. One strength of the work plan is that many of the early milestones are launched simultaneously in the early stages, leaving potentially more time for implementation and impacts to appear.

The estimated costs for state planning for funding over time do not seem fully credible or sufficiently supported in this proposal. Reducing the total schooling years for students in these states for grades 9-16 would be required to sustain the long-term funding model in this program. There is no plan in this proposal for through-put to increase at post-secondary or even maintain at the current rates in the presence of the new population. Funding potentially hinges on shifting costs from K-12 to university systems, without agreements in place at this time that the university systems will absorb these costs and admit/support a substantially larger percentage of minors, who have only lower division preparation from their high school programs.

Recommendation: It might be helpful for more of the key personnel to be assigned full-time rather than part-time. More focused attention seems warranted for a project that is this ambitious, in order for it to address critical questions that remain open such as accessibility, student support services, and long term longevity of the system within states at scale.

Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.

	Available	Score
Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.	10	0

Competitive Reviewer Comments:

The plan to develop a STEM program is weakly described. Courses to be included are not indicated, as required in this section. Also, it is not clear exactly what the instructional focus areas would be for the STEM effort, nor whether the courses would comprise a strong course of study to prepare students for STEM post-secondary and/or career work. The input to be provided by IHEs, and the funding allocated, seems insufficient for a general development effort as mentioned, that would have credibility as being an improvement over current STEM approaches available for high schools.

If the intention is to parallel adopting current materials of the board examinations systems in order to lower this cost barrier and make it possible to implement within budget, this has not been well described. This approach, if taken, would suffer from the implementation, accessibility and sustainability issues described previously in sections B1-6.

Competitive Preference Priority 2: Focus on Career Readiness and Placement.

	Available	Score
Competitive Preference Priority 2: Focus on Career Readiness and Placement.	10	10

Competitive Reviewer Comments:

The project proposal in this area does include some specification of the courses for which assessments will be developed, how the courses could comprise a reasonably rigorous course of study to prepare high school students for career and technical education, and shows some evidence of industry support.

One concern is that very limited funding is included in the budget for the Career and Technical group, less than \$200,000. This seems as if it may be insufficient to meet the needs of the stated objectives and approaches in this section of the proposal. However, if sufficient monies are present for board examination preparation of students for initial career efforts especially through industry-certified credentials, the efforts in this proposal could be helpful to students.

Such certification is already being done in many states at the community college level, through numerous programs supported for industry certification in post-secondary studies and assessment. One question that arises is why duplication in the high schools would be helpful. If the intent in this proposal is to qualify students at the lower division skills/knowledge across a more general domain of learning, and then allow all who pass and choose to do so to attend higher education, it would seem students interested in industry certification could opt for moving to these programs at post-secondary after the two-year HS diploma.

Recommendation: The consortium should substantially increase the amount of money going into the effort for the career readiness specified here, especially relative to funds spent on governance and project management. It also should clearly describe what educational efforts would be helpful in high school as compared to duplicating efforts that may be in place elsewhere.

Absolute Priority: High School Course Assessment Programs

	Available	Score
Absolute Priority: High School Course Assessment Programs		No

Absolute Reviewer Comments:

Several areas of the absolute priority seem not fully to be met in this proposal:

Regarding (ai) in the Absolute Priority, due to concerns described in B1-B3, it is not clear how adjusting the board examination systems as described in this proposal will modify the properties of the current systems and thus the robustness and appropriateness of the assessments and other materials to be adopted. A clear case has not been made that programs such as AP, IB or others that might be adopted can be effectively modified in this way, such that they allow for accessible, valid, fair and broad participation of students and schools, maintain the robustness and rigor required for the stated theory of action, and still retain their research-based characteristics.

Regarding (aiiiA) and (aiiiB) in the Absolute Priority, due to concerns in (ai) and those described in the research and evaluation section (B4) on providing growth data, it is not clear that the student achievement data and student growth data will be able to be used in determinations of individual principal and teacher effectiveness, or in teaching, learning and program improvement. Furthermore, sustainability issues regarding the long-term funding model also may jeopardize this approach as a long term solution to evaluating these aspects of effectiveness in schools.

Regarding (b), concerns expressed throughout this review regarding scale suggest that the Absolute Priority may not be met for implementation at a scale that will enable significant improvement in student achievement outcomes statewide.

Grand Total	220	106
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Budgets

Level 1 Budget
Name: Level 1 Budget(s)

The allocation of funding to governance and project management seems high relative to what is allocated for the other aspects of this proposal. Pay rates for some of the senior officers seem extraordinarily high. Another key aspect to note is that two sets of budgets were submitted with this proposal. Full funding of work indicated in the proposal to deploy the system to 10 schools per state is being provided by hypothetical i3 grant funding, which has not been awarded. It seems that only 4 schools per state would be supported with board examination systems, curriculum, and professional development during the duration of the grant through funding directly on the RTTA project. This adds to concerns of scale and scope regarding the Absolute Priority for the RTTA NIA.



Race to the Top

High School Course Assessment Programs Technical Review Form



Board Examination Systems Application #BES (b)
(6)

(B)(1) Consortium Governance

	Available	Score
(B)(1) Consortium Governance	30	5

(B)(1) Reviewer Comments:

(a)

Existing board examinations (e.g., College Board, IB) that meet unspecified criteria, are to be aligned with the CCSS, certified by SCOBES, and then offered to LEAs, which would volunteer to purchase and implement the examination programs. Students who pass the examinations would be eligible for a special diploma and/or exemption from college remedial courses.

The vision statement does not make clear how SCOBES would add value to the way in which LEAs now do business with examination programs or how IHEs value them. Grant funds would subsidize the examination programs during the term of the grant. Funding after expiration of the grant is unclear. The argument that there would be "savings" to schools from early college admissions appears not to recognize that school funding depends largely on actual attendance. See the comment below in section (B)(6)(d).

The proposal assumes significant additional funding from other grants, which are in question. Work including evaluation, technical reports, and research reports are contingent on receiving the other grant awards.

(b)

The description of structure and organization is confusing. The organizational chart appears to mix offices (e.g., "Finance and Administration") with tasks (e.g., "Board Examination Specifications Development and Certification") The only group reporting directly to the Board of Trustees (in addition to the President Deputy Director) is the Technical Advisory Committee. The project management partner, which manages the Consortium's funds, reports to "State Services," not as one might expect to "Finance and Administration." The proposal refers to a nominating committee – not shown on the organizational chart. It is unclear why the STEM Task Force reports to "Research, Policy Analysis and Evaluation," but the "Career and Technical Education Task Force" reports directly to the President Deputy Director.

(c)

The MOU spells out key policies to be followed by states. However, as the letter of support from Massachusetts makes clear, compliance is contingent on funding and legislative approval.

Paragraph VI.A.4 of the MOU requires that at least one course assessment program be implemented by 2013-14, a condition that is likely already met by every state now.

The MOU requires states to "identify" at least 10 schools to participate in the pilot program, and to make the program "available" statewide providing that the evaluation is positive. Neither of these requirements suggests that any new (beyond currently existing) participation in these programs would occur.

(d)

The lead procurement state would purchase examination programs on behalf of the other consortium states. However, the proposal notes that the purchasing laws of three states are not consistent with this

arrangement. Paragraph X of the MOU states that it does not “constitute any financial commitment on the part of either the State or the Consortium.” Beyond this statement the MOU does not make reference to “procurement.” It is unclear what the states’ commitment to the procurement process means.

Recommendations

The requested funding would temporarily replace existing state and local resources for examination programs that are already running. While state and local agencies might welcome new funds, after the end of the funding period these agencies would need once again to find ways to support the programs.

The proposal asserts without any evidence that these existing programs would be expanded and/or new programs would be created. Evidence of unmet demand for these programs and the capacity to implement them successfully is needed.

(B)(2) Theory of Action

	Available	Score
(B)(2) Theory of Action	5	1

(B)(2) Reviewer Comments:

The theory of action asserts that the mere availability of voluntary examinations, together with instructional materials and professional development (provided now only to a select group of teachers and students) motivates teachers and students (in future for a broader population) to work harder and achieve more. The incentives are special diplomas, industry-recognized certification, and preferred acceptance/enrollment at IHEs. However, this is speculation, not a theory based on a professionally acceptable body of evidence.

(a)

The proposal notes that curriculum and grade requirements for the special diploma are to be set by each state, except that “passing standards” on the lower division math and ELA tests are set by the consortium. It is unclear how this would improve the coherence of high school education.

b) – (d)

The proposal does not describe how the program will stimulate diverse course offerings, or how it could be scaled-up. A core problem is that student, teacher, and school participation is voluntary. Individuals and schools may self-select into the program if they are already using the examinations. Evidence is needed that there is a supply of sufficiently qualified teachers and students needed to implement the program. If they are not now participating, there is little incentive for them to join.

(B)(3) Course Assessment Program Design and Development

	Available	Score
(B)(3) Course Assessment Program Design and Development	60	10

(B)(3) Reviewer Comments:

(a)

The proposal cites two examples: the International Baccalaureate Diploma program; and, the Pearson/Edexcel International General Certificate of Secondary Education program. The proposal asserts that these programs would be adapted by their providers, at their expense, to develop core programs that align with the CCSS. Traditionally, these testing programs address only the most academically elite students and teachers. The proposal does not make clear how or why their providers would agree to adapt

them, at their expense, to be suitable for a broader range of students in the U.S. Documentation of a commitment by test providers is lacking.

Assuming that the assessments might be suitably adapted, it is not clear that there are enough qualified teachers to provide the programs. It is not clear that there are enough students entering high school with the preparation needed to attempt these programs.

The assessments are suitable for measuring very high level academic performance for the purpose of determining advanced placement in college. However, no evidence is provided of their suitability for measuring college and career readiness (avoiding remediation in college).

(b)

The proposal mentions a task force of eminent scholars being assembled by Arizona State University, but does not document membership.

The procedures used to evaluate alignment with the CCSS are not described.

(c)

The proposal describes assessments which are rigorous and which will likely remain so.

(d)

The proposal refers the reader to Appendix K for a description of the assessment components. However, Appendix K contains only brief summaries of the assessments.

The proposal asserts the validity of the assessments without considering their intended uses in U.S. high schools.

The proposal asserts that all necessary data elements would be available, but does not provide detail. It is unclear how student growth would be measured. The proposal does not address the development of a scale for measuring growth.

The proposal asserts that "there is simply not space here to describe in any detail the variety of methods and procedures" used to assure technical adequacy.

The discussion of access for SWDs and ELLs is not persuasive. The proposal cites accommodations already provided in the board examinations. However these examinations were not originally developed to address the needs of most students with disabilities and English language learners (for example, as might be the case for tests that implement Universal Design principals). Evidence is needed that suitable accommodations can be provided for a broader range of students with disabilities and English language learners.

(B)(4) Research and Evaluation

	Available	Score
(B)(4) Research and Evaluation	25	3

(B)(4) Reviewer Comments:

(a)

There is little question that the proposed tests are technically adequate as they are now used. However, SCOBES intends to adapt the tests and use them differently. SCOBES proposes to verify technical adequacy by conducting studies under the guidance of its TAC. Technical and content-related documents are to be gathered and studied as a part of the certification process. Some of the required information is likely proprietary and will not be readily obtained. There is no documentation that the test providers have

agreed to a relationship with SCOBES or to be studied in this way. There is no evidence that enough of the right data could be collected to verify technical adequacy for the new uses that SCOBES describes.

If the tests are to be adapted and used for new purposes, new technical studies are needed. Ideally, there would be new planned analyses, field-testing of the adapted tests, and new technical documentation. The studies proposed in the research plan, although interesting, do not appear to be designed to support technical adequacy.

(b)

SCOBES has arranged for an independent evaluation of the program. The proposed measures of success and research questions are reasonable. However, participation of LEAs and students in the program is voluntary (a convenience sample not representative of the population) and likely to include only those already participating in the same or similar programs. Comparisons with "matched" control schools cannot take into account the characteristics of those schools and students that induce them to volunteer.

Some of the data would be obtained from state administrative databases, which means that the school (or subgroup within school) is the smallest unit of analysis. Without access to individual student and teacher data (possibly requiring parent permission), program effects would likely not be discernable. The study designs are not sufficiently described to permit judgment of their quality.

The evaluation does not address the issue of statistical power – whether sufficient numbers of students and schools participate to permit meaningful analyses (e.g., hierarchical linear modeling). The lack of power is exacerbated by the fact that there are multiple test providers, further diluting the numbers available to determine effectiveness of specific programs.

The evaluation does not address important qualitative issues, for example, the attitudes and beliefs of participating individuals.

Recommendation

The evaluation studies should incorporate a multi-level design taking into account individuals, schools, districts, and states.

(B)(5) Course Assessment Program Implementation

	Available	Score
(B)(5) Course Assessment Program Implementation	45	5

(B)(5) Reviewer Comments:

(a)

The proposal does not describe a plan for promoting participation other than somehow getting LEAs to agree and persuading parents and students to sign up. This may be feasible for schools and students that already participate in these programs. However, it is unclear that new participation will be readily obtained. No justification was given for the expected numbers of participating schools, parents, and students.

No rationale was provided for the predicted increases (50 % per year) in participation.

Appendix M includes letters of support from 80 LEAs. However, the letters do not state an actual commitment on the part of the LEAs to implement the program.

(b)

The proposal assumes that the support to teachers and administrators that is now provided by the examination programs would be appropriate in an expansion of the programs. Existing supports are

designed for highly qualified and motivated teachers and students, and would not be sufficient to support less qualified and less motivated teachers and students.

(B)(6) Project Management

	Available	Score
(B)(6) Project Management	35	5

(B)(6) Reviewer Comments:

(a)

The National Center on Education and the Economy (NCEE) has conducted large scale programs in the past that have been focused on standards (1992), effective schools/literacy (1998), and training school principals (1999). However, the proposal cites few, if any, recent programs, and little experience in assessment programs.

Key staff are well-qualified in the areas of education policy, staff development, and curriculum.

(b)

Many of the timeline's tasks share common end- and start-dates, even though successful initiation of one task depends on the successful conclusion of a prior task. Instead of showing a detailed, year-by-year schedule, the timeline is collapsed across four years. For example, the "collect data" task is scheduled from June 2011 through September 2014. As presented, the work-plan and timeline is inadequate.

(c)

Given the lack of clarity in the work-plan, it is difficult to judge the adequacy and reasonableness of the budget.

(d)

The proposal claims that states will continue to administer this program because "the reduction in high schools costs produced by high school students leaving early to enroll in college after their sophomore or junior years." However, schools are only funded for actual student attendance, so early leavers would produce no savings, but would reduce school funds. Reallocation of "savings" back to schools would likely require state legislatures to act, and is far from certain at this time of tight budgets. Moreover, the hypothesis that some students will leave early is yet to be tested, and may not materialize.

Recommendation

More assessment expertise is needed on NCEE staff.

Create a detailed, year-by-year timeline that reflects task interdependencies.

Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.

	Available	Score
Competitive Preference Priority 1: Focus on Preparing Students for Study in STEM-Related Fields.	10	0

Competitive Reviewer Comments:

The proposed plan is to examine the catalogues of course and examination programs of the various assessments, and from them to select a group of upper division courses that would constitute a STEM

program. The proposal does not list the STEM courses as required in (a), or how these courses would provide a rigorous course of study (b).

The plan assumes without justification that these courses and assessments, which are tailored to academically elite schools and students, can be successfully implemented in other schools and with other students. The proposal does not show how this can be done.

Competitive Preference Priority 2: Focus on Career Readiness and Placement.

	Available	Score
Competitive Preference Priority 2: Focus on Career Readiness and Placement.	10	0
Competitive Reviewer Comments:		
<p>The plan is to review highly regarded career and technical assessments/qualification systems. A task force would then recommend programs of study.</p> <p>The proposal does not describe specific courses (although it does cite several English systems of technical qualifications) or how they would comprise a rigorous course of study.</p> <p>It is unclear how these systems, good though they may be, can be transplanted on a larger scale from one county / political system / school system to the United States which has a very different school and political system.</p> <p>The relatively small amount budgeted for this task raises doubts that a high quality plan to implement this priority can be developed.</p>		

Absolute Priority: High School Course Assessment Programs

	Available	Score
Absolute Priority: High School Course Assessment Programs		No
Absolute Reviewer Comments:		
<p>SCOBES proposes to select certain high quality examination programs that are now used by academically elite schools, teachers, and students. These examination programs (including curricula and professional development) would be adapted for use in a broader range of U.S. schools.</p> <p>The proposal does not make clear:</p> <ul style="list-style-type: none"> • How the assessment systems would align to CCSS. It is not obvious that high-end board examination program standards will align with the full range of the CCSS. Evidence was not provided that the board examination programs will agree to modify their assessments to achieve alignment. It is not clear that the board examination programs can now provide scores that accurately measure college and career readiness (versus advanced placement in college). • How this project would produce student achievement data to evaluate principal and teacher effectiveness and to inform school improvement. State administrative databases do not provide access to individual student and teacher test data needed to produce the necessary analyses. The proposal does not describe how states' privacy rules will be addressed in order to obtain the data. The proposal does not address the administrative processes (collection and management of student and staff identifiers) needed to produce the analyses. The proposal does not describe how student growth can be measured by the examination programs. There is no evidence that the examinations have been developed or scaled in a way that permits the valid measurement of growth. The lack of comparability of scores obtained from the various examination programs will restrict the ability to conduct the required evaluations. 		

- How the assessment systems would apply to the broadest possible range of students, including SWDs and ELLs. It is not clear that the accommodation policies of the board examination programs (now tailored to academically elite students) can be applied to the broadest possible range of students. It is not clear that the board examination programs would agree to modifying their accommodation policies (thereby possibly compromising the constructs being measured). Evidence was not provided that the examinations in question were developed using universal design principles.
- How the program can be implemented at a scale that will enable significant statewide improvement in achievement. The proposal does not describe how new participation of schools and students would be obtained. SCOBES assumes without justification that additional schools, teachers, and students will be ready (and therefore willing/able) to participate in the programs.

Grand Total	220	29
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Budgets

<p>Level 1 Budget</p> <p>Name: Level 1 Budget(s)</p> <p>SCOBES presented two budgets: one that assumes other grant funds, and one that does not. Since the other funds are hypothetical, these comments address only the possibility of an RTTA grant.</p> <p>NCEE plans to have 8.6 FTE working on the project over four years, costing \$6.7 million. This means that 22.3% of the requested funds would fund the project management partner. This percentage is high, particularly in that the examination systems in question already exist and the project management partner is merely facilitating their use in U.S. schools.</p> <p>Appendix B describes Kentucky's negotiation of compensation with the best evaluated vendor (project manager) . Fair and reasonable compensation was determined to include a maximum cap of ten percent of the total grant award for any program management activities associated with actual implementation of the grant. The apparent discrepancy between Kentucky's cap and the actual percent of funds allocated to the management partner needs explanation.</p>
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