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May 1, 2023

Mr. Patrick Rooney Director School Support and Accountability Office of Elementary and Secondary Education U.S. Department of Education 400 Maryland Ave. S.W Washington DC 20202 Mr. James Lane Senior Advisor Office of Elementary and Secondary Education U.S. Department of Education 400 Maryland Ave. S.W Washington DC 2020

Dear Mr. Rooney and Mr. Lane:

I am writing on behalf of Knowledge Alliance in response to the U.S. Department of Education's (ED's) <u>request for information</u> (RFI) soliciting comments from the field on successful approaches to innovative assessment that can encourage State educational agencies (SEAs) to pursue the Innovative Assessment Demonstration Authority (IADA) and improve statewide assessments. Knowledge Alliance, a non-profit, non-partisan organization, is comprised of leading education organizations committed since 1971 to the greater use of high-quality and relevant data, research, evaluation, and innovation in education policy and practice at all levels. Collectively, KA and its members promote the use of rigorous research to figure out what works to improve student outcomes and then share those findings with policymakers, practitioners, and the general public. Our members have vast experience as test developers, administrators, and users of assessment data.

KA commends and supports ED for supporting innovation in assessment to address education officials' hopes that the statewide summative assessments most students take each year could be used not only for accountability, but also to guide instruction. We further commend and support ED for seeking input through this RFI on specific examples and models of measuring comparability that ED should consider, as well as feedback on any barriers to States' participation in the IADA.

As ED engages in this process, it is critical that, as flexibility and innovation are integrated into assessment design and protocols, there remains a way to highlight performance gaps among student subgroups, compare achievement objectively across districts and schools, and identify resource needs. KA encourages ED to continue to support innovation in assessment while ensuring that, in this process, comparability remains a core tenet and assessments remain a critical vehicle for ensuring that the educational system is addressing and meeting the needs of all students.

We thank you for the opportunity to comment on this matter. If I can be of any other assistance, please do not hesitate to contact me.

Sincerely

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