

UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Richard Woods State Superintendent Georgia Department of Education 205 Jesse Hill Jr. Drive SE Atlanta, GA 30334

March 8, 2019

Dear Superintendent Woods:

Thank you for submitting Georgia's application for the Innovative Assessment Demonstration Authority (IADA) authorized in section 1204 of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA). I appreciate the work of you and your team to develop this IADA proposal.

I am writing to provide initial feedback based on the U.S. Department of Education's (the Department's) review of the Georgia Department of Education (GADOE) IADA application. As you know, in addition to the Department's review of the application, we conducted, as required by the statute, a peer review of the application. Peer reviewers examined the application using the program requirements and selection criteria described in 34 CFR §§200.105 and 200.106. The goal of the peer review was to inform the Department regarding whether the proposed system is comparable to the State assessments, valid, reliable, of high technical quality, consistent with relevant, nationally recognized professional and technical standards and provides unbiased, rational and consistent determinations of progress toward meeting the ambitious, Statedesigned long-term goals for academic achievement.

Based on our review of the peer feedback and our own analysis of the application, I am requesting additional information to ensure the State's application meets all statutory and regulatory requirements, as detailed in the enclosed table. In addition, information is requested to strengthen your State's application regarding several of the selection criteria. I am also enclosing a copy of the peer technical review forms. Please note that the Department's feedback may differ from that contained in the peer review form. I encourage you to read the full peer review forms for additional suggestions and recommendations regarding GADOE's application. Department staff will contact you to support Georgia in addressing the items enclosed with this letter.

ESEA section 1204(f)(4) requires the Department to issue a written determination within 90 days of a State's submission of its IADA application, which is March 17, 2019, for the GADOE application. Given this statutory requirement, I ask that you provide the requested additional information and submit it through OMB Max by March 18, 2019. If you would like more time to submit additional information, please contact your OESE Program Officer at OSS.Georgia@ed.gov and indicate your new submission date. Please recognize that if the

400 MARYLAND AVE., SW, WASHINGTON, DC 20202 www.ed.gov

Page 2 – The Honorable Richard Woods

Department accommodates your request for additional time, a determination on the GADOE IADA application may be rendered after the 90-day period.

Thank you for the important work that you and your staff are doing to support the innovation that is possible through the ESSA. The Department looks forward to working with you to ensure that all children have the opportunity to reach their full potential.

Sincerely,

/s/

Frank T. Brogan Assistant Secretary for Elementary and Secondary Education

Enclosures

cc: Allison Timberlake, Deputy Superintendent Assessment and Accountability

Items that Require Additional Information or Revision in Georgia's Innovative Assessment Demonstration Authority Plan

Regulatory Requirement	Required information from the SEA
Consultation. Evidence that the SEA or consortium has	No evidence needed.
developed an innovative assessment system in collaboration	
with	
(1) Experts in the planning, development, implementation, and	
evaluation of innovative assessment systems, which may include	
external partners; and	
(2) Affected stakeholders in the State, or in each State in the	
consortium, including	
(i) Those representing the interests of children with disabilities,	
English learners, and other subgroups of students described in	
section 1111(c)(2) of the Act;	
(ii) Teachers, principals, and other school leaders;	
(iii) Local educational agencies (LEAs);	
(iv) Representatives of Indian tribes located in the State;	
(v) Students and parents, including parents of children described	
in paragraph (a)(2)(i) of this section; and	
(vi) Civil rights organizations.	
<u>Innovative assessment system</u> . A demonstration that the	For the Georgia MAP Assessment Partnership (GMAP)
innovative assessment system does or will	assessment model, clarification is needed regarding the
(1) Meet the requirements of section 1111(b)(2)(B) of the Act,	relationship of growth scores described in the application
except that an innovative assessment	and the requirement that assessments yield an annual
(i) Need not be the same assessment administered to all public	summative determination of proficiency of the State's
elementary and secondary school students in the State during the	academic content standards.
demonstration authority period described in 34 CFR	
200.104(b)(2) or extension period described in 34 CFR 200.108	
and prior to statewide use consistent with 34 CFR 200.107, if the	
innovative assessment system will be administered initially to all	
students in participating schools within a participating LEA,	
provided that the statewide academic assessments under 34 CFR	
200.2(a)(1) and section 1111(b)(2) of the Act are administered to	

Page 4 – The Honorable Richard Woods

Regulatory Requirement	Required information from the SEA
all students in any non-participating LEA or any non-participating school within a participating LEA; and (ii) Need not be administered annually in each of grades 3-8 and at least once in grades 9-12 in the case of reading/language arts and mathematics assessments, and at least once in grades 3-5, 6-9, and 10-12 in the case of science assessments, so long as the statewide academic assessments under 34 CFR 200.2(a)(1) and section 1111(b)(2) of the Act are administered in any required grade and subject under 34 CFR 200.5(a)(1) in which the SEA does not choose to implement an innovative assessment.	
(2)(i) Align with the challenging State academic content standards under section 1111(b)(1) of the Act, including the depth and breadth of such standards, for the grade in which a student is enrolled; and (ii) May measure a student's academic proficiency and growth using items above or below the student's grade level so long as, for purposes of meeting the requirements for reporting and school accountability under sections 1111(c) and 1111(h) of the Act and paragraphs (b)(3) and (b)(7)-(9) of this section, the State measures each student's academic proficiency based on the challenging State academic standards for the grade in which the student is enrolled; (3) Express student results or competencies consistent with the challenging State academic achievement standards under section 1111(b)(1) of the Act and identify which students are not making sufficient progress toward, and attaining, grade-level proficiency on such standards;	For all three proposed models, the Cobb County School District (CCSD); the GMAP; and the Putnam County consortium: 1. Information regarding the processes and procedures of their multiple event administration designs, in order to ensure that all students who participate in the pilot assessments are assessed against all of the State's academic content standards (e.g., what are the procedures in the event of a student absence from one of the scheduled testing administrations?). 2. Information regarding the content specifications of the pilot assessments. Specifically, prototype test blueprint documents comparable to those used for the statewide assessments must be provided to ensure that the pilots are designed in a way to assess the full depth and breadth of the academic content standards. For the CCSD, a plan to express student results in terms of the State's academic achievement standards (e.g., what are the psychometric linking designs/decisions inherent in the scaling plan for the CCSD test? What justifications are there to support the scaling plan for the test?).

Page 5 – The Honorable Richard Woods

Regulatory Requirement	Required information from the SEA
	For the GMAP, clarification is needed regarding the relationship of growth scores described in the application and the requirement that assessments yield an annual summative determination of proficiency of the State's academic content standards. Information provided for the GMAP in (b)(1) will also address the concern raised in this requirement.
(4)(i) Generate results, including annual summative determinations as defined in paragraph (b)(7) of this section, that are valid, reliable, and comparable for all students and for each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I)	For the CCSD: 1. Information regarding the sample sizes planned in the concurrent testing of both the pilot and the State summative assessments.
and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act, to the results generated by the State academic assessments described in 34 CFR 200.2(a)(1) and section 1111(b)(2) of the Act for such students.	 2. An explanation for how variations across forms (that may differ in both mode, content and item types) will: a. Be included in the comparability analyses for the CCSD pilot assessments. b. Will result in valid and reliable estimates of student
Consistent with the SEA's or consortium's evaluation plan under 34 CFR 200.106(e), the SEA must plan to annually determine	achievement for all students that participate in the pilot assessments.
comparability during each year of its demonstration authority period in one of the following ways : (A) Administering full assessments from both the innovative and statewide assessment systems to all students enrolled in participating schools, such that at least once in any grade span	3. An assurance that CCSD will perform comparability analyses for every year that pilot assessment scores are used in lieu of State assessment scores during the period of the authority (if awarded).
(i.e., 3-5, 6-8, or 9-12) and subject for which there is an	For the GMAP:
innovative assessment, a statewide assessment in the same subject would also be administered to all such students. As part of this determination, the innovative assessment and statewide assessment need not be administered to an individual student in	1. An assurance that GMAP will perform comparability analyses for every year that pilot assessment scores are used in lieu of State assessment scores during the period of the authority (if awarded).
the same school year. (B) Administering full assessments from both the innovative and statewide assessment systems to a demographically representative	 2. More detailed and specific information regarding the inclusion of performance tasks on the GMAP assessment. Information provided in response to (b)(2)

Regulatory Requirement

sample of all students and subgroups of students described in section 1111(c)(2) of the Act, from among those students enrolled in participating schools, such that at least once in any grade span (i.e., 3-5, 6-8, or 9-12) and subject for which there is an innovative assessment, a statewide assessment in the same subject would also be administered in the same school year to all students included in the sample.

- (C) Including, as a significant portion of the innovative assessment system in each required grade and subject in which both an innovative and statewide assessment are administered, items or performance tasks from the statewide assessment system that, at a minimum, have been previously pilot tested or field tested for use in the statewide assessment system.
- (D) Including, as a significant portion of the statewide assessment system in each required grade and subject in which both an innovative and statewide assessment are administered, items or performance tasks from the innovative assessment system that, at a minimum, have been previously pilot tested or field tested for use in the innovative assessment system.
- (E) An alternative method for demonstrating comparability that an SEA can demonstrate will provide for an equally rigorous and statistically valid comparison between student performance on the innovative assessment and the statewide assessment, including for each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act;
- (ii) Generate results, including annual summative determinations as defined in paragraph (b)(7) of this section, that are valid, reliable, and comparable, for all students and for each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act, among participating schools and LEAs in the innovative

Required information from the SEA

above may address this request.

- 3. A description of how variations across forms of the GMAP (e.g., forms with performance tasks and forms without performance tasks) will be analyzed for comparability.
- 4. A description of how the results of various linking studies described in the application will be estimate comparability.
- 5. A clear indication of how comparability will be determined (i.e., one of the five methods identified in the regulations and shown on the left).

 $Page \ 7- The \ Honorable \ Richard \ Woods$

Regulatory Requirement	Required information from the SEA
assessment demonstration authority. Consistent with the SEA's	
or consortium's evaluation plan under 34 CFR 200.106(e), the	
SEA must plan to annually determine comparability during each	
year of its demonstration authority period; (5)(i) Provide for the participation of all students, including	No evidence needed.
children with disabilities and English learners;	No evidence needed.
(ii) Be accessible to all students by incorporating the principles	
of universal design for learning, to the extent practicable,	
consistent with 34 CFR 200.2(b)(2)(ii); and	
(iii) Provide appropriate accommodations consistent with 34	
CFR 200.6(b) and (f)(1)(i) and section 1111(b)(2)(B)(vii) of the	
Act;	
(6) For purposes of the State accountability system consistent	For all three proposed modelsthe CCSD; the GMAP; and
with section 1111(c)(4)(E) of the Act, annually measure in each	the Putnam County consortium, more information regarding
participating school progress on the Academic Achievement indicator under section 1111(c)(4)(B) of the Act of at least 95	the processes and procedures of these multiple event administration designs, in order to ensure that at least 95
percent of all students, and 95 percent of students in each	percent of all students are able to participate in all parts of
subgroup of students described in section 1111(c)(2) of the Act,	the pilot assessments.
who are required to take such assessments consistent with	the prior assessments.
paragraph (b)(1)(ii) of this section;	
7) Generate an annual summative determination of achievement,	For all three proposed modelsthe CCSD; the GMAP; and
using the annual data from the innovative assessment, for each	the Putnam County consortium, as noted in (b)(2) above,
student in a participating school in the demonstration authority	information is needed regarding the processes and
	1
,	<u> </u>
	determination.
	For the CCSD and GMAP models, clarification regarding as
student in a participating school in the demonstration authority that describes (i) The student's mastery of the challenging State academic standards under section 1111(b)(1) of the Act for the grade in which the student is enrolled; or (ii) In the case of a student with the most significant cognitive disabilities assessed with an alternate assessment aligned with alternate academic achievement standards under section 1111(b)(1)(E) of the Act, the student's mastery of those	information is needed regarding the processes and procedures of these multiple event administration designs, in order to ensure that all students who participate in pilot assessments are assessed against all of the academic content standards in determining the annual summative determination. For the CCSD and GMAP models, clarification regarding as to how the "through-year" assessments will be aggregated

Page 8 – The Honorable Richard Woods

Regulatory Requirement	Required information from the SEA
standards;	into one summative determination.
(8) Provide disaggregated results by each subgroup of students described in 34 CFR 200.2(b)(11)(i)(A)-(I) and sections 1111(b)(2)(B)(xi) and 1111(h)(1)(C)(ii) of the Act, including timely data for teachers, principals and other school leaders, students, and parents consistent with 34 CFR 200.8 and section 1111(b)(2)(B)(x) and (xii) and section 1111(h) of the Act, and provide results to parents in a manner consistent with paragraph (b)(4)(i) of this section and part 200.2(e);	 For the GMAP model: A description of how the time needed for anticipated analyses (such as linking activities) is accounted for between operational testing and reporting. Without a clear understanding of these procedures, it is unclear that the pilot assessment results will be able to be produced disaggregated for all required sub-groups. Clarification is needed regarding the relationship of growth scores described in the application and the requirement that assessments yield an annual summative determination of proficiency of the State's academic content standards (as noted in b(1) above). For the CCSD model, as noted under (b)(2) above, information describing a plan (which would address psychometric linking designs/decisions and provide justifications) to express student results in terms of the State's academic achievement standards is needed in order to report results for all required sub-groups.
(9) Provide an unbiased, rational, and consistent determination of progress toward the State's long-term goals for academic achievement under section 1111(c)(4)(A) of the Act for all students and each subgroup of students described in section 1111(c)(2) of the Act and a comparable measure of student performance on the Academic Achievement indicator under section 1111(c)(4)(B) of the Act for participating schools relative to non-participating schools so that the SEA may validly and reliably aggregate data from the system for purposes of meeting requirements for (i) Accountability under sections 1003 and 1111(c) and (d) of the Act, including how the SEA will identify participating and non-	For the CCSD and GMAP models, a description regarding how the GaDOE will identify participating schools in a consistent manner for comprehensive and targeted support and improvement (e.g., how will the State use the results from CCSD and GMAP pilot assessments within the statewide system of accountability).

Page 9 – The Honorable Richard Woods

Regulatory Requirement	Required information from the SEA
participating schools in a consistent manner for comprehensive	
and targeted support and improvement under section	
1111(c)(4)(D) of the Act; and	
(ii) Reporting on State and LEA report cards under section	
1111(h) of the Act.	
<u>Initial implementation in a subset of LEAs or schools</u> . If the	No evidence needed.
innovative assessment system will initially be administered in	
a subset of LEAs or schools in a State	
(1) A description of each LEA, and each of its participating	
schools, that will initially participate, including demographic	
information and its most recent LEA report card under section	
1111(h)(2) of the Act; and	
(2) An assurance from each participating LEA, for each year that	
the LEA is participating, that the LEA will comply with all	
requirements of this section.	
Application from a consortium of SEAs. If an application for	No evidence needed.
the innovative assessment demonstration authority is submitted	
by a consortium of SEAs	
(1) A description of the governance structure of the consortium,	
including	
(i) The roles and responsibilities of each member SEA, which	
may include a description of affiliate members, if applicable, and	
must include a description of financial responsibilities of member	
SEAs;	
(ii) How the member SEAs will manage and, at their discretion,	
share intellectual property developed by the consortium as a	
group; and	
(iii) How the member SEAs will consider requests from SEAs to	
join or leave the consortium and ensure that changes in	
membership do not affect the consortium's ability to implement	
the innovative assessment demonstration authority consistent with	
the requirements and selection criteria in this section and 34 CFR	

Page 10 – The Honorable Richard Woods

Regulatory Requirement	Required information from the SEA
200.106.	
(2) While the terms of the association with affiliate members are	
defined by each consortium, consistent with 34 CFR	
200.104(b)(1) and paragraph (f)(1)(i) of this section, for an	
affiliate member to become a full member of the consortium and	
to use the consortium's innovative assessment system under the	
demonstration authority, the consortium must submit a revised	
application to the Secretary for approval, consistent with the	
requirements of this section and 34 CFR 200.106 and subject to	
the limitation under 34 CFR 200.104(d).	
Assurances	No evidence needed.

Page 11 – The Honorable Richard Woods

Application Selection Criteria	Required information from the SEA
(a)(1) The rationale for developing or selecting the particular	No evidence needed.
innovative assessment system to be implemented under the	
demonstration authority, including	
(i) The distinct purpose of each assessment that is part of the	
innovative assessment system and how the system will advance	
the design and delivery of large-scale, statewide academic	
assessments in innovative ways; and	
(ii) The extent to which the innovative assessment system as a	
whole will promote high-quality instruction, mastery of	
challenging State academic standards, and improved student	
outcomes, including for each subgroup of students described in	
section 1111(c)(2) of the Act;	
(a)(2) The plan the SEA or consortium, in consultation with any	For the CCSD and GMAP models, more information
external partners, if applicable, has to	regarding the development and use of standardized and
(i) Develop and use standardized and calibrated tools, rubrics,	calibrated tools, rubrics, methods, or other strategies for
methods, or other strategies for scoring innovative assessments	scoring innovative assessments throughout the
throughout the demonstration authority period, consistent with	demonstration authority period.
relevant nationally recognized professional and technical	
standards, to ensure inter-rater reliability and comparability of	
innovative assessment results consistent with 34 CFR part	
200.105(b)(4)(ii), which may include evidence of inter-rater	
reliability; and	
(ii) Train evaluators to use such strategies, if applicable;	
(a)(3) If the system will initially be administered in a subset of	For the CCSD, GMAP and Putnam County models:
schools or LEAs in a State	1. Additional information regarding the scaling of the
(i) The strategies the SEA, including each SEA in a consortium,	proposed innovative assessments to statewide use,
will use to scale the innovative assessment to all schools	specifically a clear description for how the State plans
statewide, with a rationale for selecting those strategies;	to choose just one of these innovative assessment
(ii) The strength of the SEA's or consortium's criteria that will	options for final statewide implementation with
be used to determine LEAs and schools that will initially	sufficient time for the State to scale that one design for
participate and when to approve additional LEAs and schools, if	statewide implementation at the end of the IADA
applicable, to participate during the requested demonstration	period (i.e., the State needs to implement its chosen

Application Selection Criteria

authority period; and

- (iii) The SEA's plan, including each SEA in a consortium, for how it will ensure that, during the demonstration authority period, the inclusion of additional LEAs and schools continues to reflect high-quality and consistent implementation across demographically diverse LEAs and schools, or contributes to progress toward achieving such implementation across demographically diverse LEAs and schools, including diversity based on enrollment of subgroups of students described in section 1111(c)(2) of the Act and student achievement. The plan must also include annual benchmarks toward achieving high-quality and consistent implementation across participating schools that are, as a group, demographically similar to the State as a whole during the demonstration authority period, using the demographics of initially participating schools as a baseline.
- (b)(1) The extent and depth of prior experience that the SEA, including each SEA in a consortium, and its LEAs have in developing and implementing the components of the innovative assessment system. An SEA may also describe the prior experience of any external partners that will be participating in or supporting its demonstration authority in implementing those components. In evaluating the extent and depth of prior experience, the Secretary considers—
- (i) The success and track record of efforts to implement innovative assessments or innovative assessment items aligned to the challenging State academic standards under section 1111(b)(1) of the Act in LEAs planning to participate; and
- (ii) The SEA's or LEA's development or use of--
- (A) Effective supports and appropriate accommodations consistent with 34 CFR part 200.6(b) and (f)(1)(i) and section 1111(b)(2)(B)(vii) of the Act for administering innovative assessments to all students, including English learners and

Required information from the SEA

design statewide in year five).

 Information about benchmarks toward achieving implementation across participating schools that are, as a group, demographically similar to the State as a whole during the demonstration authority period for each model.

For the CCSD model:

- 1. Information regarding the adequacy of teacher training materials for performance task scoring (e.g., only one 45 minute training video was mentioned as a resource in the application).
- 2. Information regarding the qualifications of external psychometric consultants to be used on the pilot assessments.

For the GMAP model, information regarding the role of external organizations/partners in development of performance tasks for the pilot assessment and a description of their extent and depth of prior experience.

Page 13 – The Honorable Richard Woods

Application Selection Criteria	Required information from the SEA
children with disabilities, which must include professional	
development for school staff on providing such accommodations;	
(B) Effective and high-quality supports for school staff to	
implement innovative assessments and innovative assessment	
items, including professional development; and	
(C) Standardized and calibrated tools, rubrics, methods, or other	
strategies for scoring innovative assessments, with documented	
evidence of the validity, reliability, and comparability of annual	
summative determinations of achievement, consistent with 34	
CFR part 200.105(b)(4) and (7).	
(b)(2) The extent and depth of SEA, including each SEA in a	For the CCSD model, more information regarding the
consortium, and LEA capacity to implement the innovative	strategies it is using, or will use, to mitigate risks to
assessment system considering the availability of technological	support successful implementation of the innovative
infrastructure; State and local laws; dedicated and sufficient staff,	assessment.
expertise, and resources; and other relevant factors. An SEA or	
consortium may also describe how it plans to enhance its capacity	
by collaborating with external partners that will be participating	
in or supporting its demonstration authority. In evaluating the	
extent and depth of capacity, the Secretary considers	
(i) The SEA's analysis of how capacity influenced the success of	
prior efforts to develop and implement innovative assessments or	
innovative assessment items; and	
(ii) The strategies the SEA is using, or will use, to mitigate risks,	
including those identified in its analysis, and support successful	
implementation of the innovative assessment.	
(b)(3) The extent and depth of State and local support for the	No evidence needed.
application for demonstration authority in each SEA, including	
each SEA in a consortium, as demonstrated by signatures from	
the following:	
(i) Superintendents (or equivalent) of LEAs, including	
participating LEAs in the first year of the demonstration authority	
period.	

Page 14 – The Honorable Richard Woods

Application Selection Criteria	Required information from the SEA
(ii) Presidents of local school boards (or equivalent, where	-
applicable), including within participating LEAs in the first year	
of the demonstration authority.	
(iii) Local teacher organizations (including labor organizations,	
where applicable), including within participating LEAs in the first	
year of the demonstration authority.	
(iv) Other affected stakeholders, such as parent organizations,	
civil rights organizations, and business organizations.	
(c)(1) The extent to which the timeline reasonably demonstrates	For the CCSD, GMAP and Putnam County models, more
	information is needed regarding project timelines.
the requested demonstration authority period, including a	
1 •	With regard to the CCSD timeline:
1 ` '	1. Identify the parties are that will be performing or
demonstration authority period;	implementing each activity.
	2. Clarify what the difference is between the "field tests"
(iii) If applicable, how a consortium's member SEAs will	and "districtwide implementation at all the grade
implement activities at different paces and how the consortium	levels" that are both listed in Year 2 of the timeline.
	3. Clarify what grade levels/groups of students will be in
affiliate member SEA begins using the innovative assessment in	the field tests each year.
the same school year consistent with 34 CFR part 200.104(b)(2);	4. Indicate when training of teachers will occur prior to
	districtwide implementation.
	With regard to the GMAP timeline:
	1. Clarify who would be developing test items. (If local
	teachers were to be involved in item development,
	please indicate when item writing training would
	occur and who would be provide the training.)
	2. Reconcile the development of performance tasks
	beginning in year 3, which is also the year the
	comparability study was to be conducted for R/LA and
	math.

Page 15 – The Honorable Richard Woods

e:
·C.
l be doing each
_
ıld be provided
vities each year.)
•
roposed.
he possible
on.
:
ne work
sharing between
be determined.

Page 16 – The Honorable Richard Woods

Application Selection Criteria	Required information from the SEA
(d)(4) If the system includes assessment items that are locally	For the CCSD and GMAP models, more information
developed or locally scored, the strategies and safeguards (e.g.,	regarding assessment items that are locally developed or
test blueprints, item and task specifications, rubrics, scoring tools,	locally scored, specifically:
documentation of quality control procedures, inter-rater reliability checks, audit plans) the SEA or consortium has developed, or plans to develop, to validly and reliably score such items, including how the strategies engage and support teachers and other staff in designing, developing, implementing, and validly and reliably scoring high-quality assessments; how the safeguards are sufficient to ensure unbiased, objective scoring of assessment items; and how the SEA will use effective professional development to aid in these efforts.	 The strategies and safeguards (e.g., test blueprints, item and task specifications, rubrics, scoring tools, documentation of quality control procedures, interrater reliability checks, audit plans) the model has developed, or plans to develop, to validly and reliably score such items, including how the strategies engage and support teachers and other staff in designing, developing, implementing, and validly and reliably scoring high-quality assessments. How the safeguards are sufficient to ensure unbiased, objective scoring of assessment items; and how the models will use effective professional development to aid in these efforts.
(e)(1) The strength of the proposed evaluation of the innovative	No evidence needed.
assessment system included in the application, including whether	
the evaluation will be conducted by an independent, experienced	
third party, and the likelihood that the evaluation will sufficiently	
determine the system's validity, reliability, and comparability to	
the statewide assessment system consistent with the requirements	
of 34 CFR part200.105(b)(4) and (9);	
(e)(2) The SEA's or consortium's plan for continuous	No evidence needed.
improvement of the innovative assessment system, including its	
process for	
(i) Using data, feedback, evaluation results, and other	
information from participating LEAs and schools to make	
changes to improve the quality of the innovative assessment; and	
(ii) Evaluating and monitoring implementation of the innovative	
assessment system in participating LEAs and schools annually.	