

Docket ID ED-2016 -OESE-0047 : Title I – Improving the Academic Achievement of the Disadvantaged – Academic Assessments Innovative Assessments
Docket RIN 1801-AB31
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The South Dakota Department of Education (SD DOE) appreciates the opportunity to comment on proposed rules relating to innovative assessments under the Every Student Succeeds Act (ESSA). Overall the proposed rules give states some much needed flexibility in designing assessments to best meet the needs of their system.

However, SD DOE would like to highlight several areas that are potentially concerning in these regulations.

Timeline

The timeline for these innovative assessment applications are such that SEAs must be ready to implement the assessments at the time of the application. This poses difficulties as states must necessarily expend much time and many resources to build these assessments. Yet if approval is murky, this may disincentivize states to innovate. The U.S. Department of Education (US ED) may want to consider a staged approval process, whereby an SEA is able to work alongside US ED as part of the feedback and technical assistance process to ensure that the SEA's innovative development progresses in an approvable direction prior to implementation of the assessments.

Comparability

SD DOE agrees that innovative assessments must be rigorous and comparable to traditional assessments used to measure academic achievement. However, the proposed standards for comparability appear to be unnecessarily narrow. US ED should consider clarifying the other/ alternative methods via which comparability may be demonstrated. Specifically, a raw score or scale score comparability may not make sense, particularly if a state is moving from a more traditional multiple-choice type assessment to a hands-on, interactive, through-course system that engages and captures broader ranges of student skills, knowledge and ability.