



February 21, 2024

The Honorable Miguel Cardona
Secretary
U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202

Dear Secretary Cardona:

Thank you for your ongoing commitment to support state leaders in enhancing the quality of assessments and assessment systems through the Competitive Grants for State Assessments (CGSA). With this support, state, district, and school leaders are developing innovative approaches to assessment that advance teaching and learning while providing meaningful information about student performance to educators, students, and families. While progress is being made, much work remains to be done. Federal policy must promote and support state and local innovation to create more equitable and actionable assessment and accountability systems that serve all students. We appreciate that you have signaled that the next round of CGSA will be announced this coming spring, and states are eagerly awaiting the opportunity to advance their state assessment systems using CGSA funding.

We, the undersigned organizations, recognize the critical role that assessment plays in our nation's education system and the urgent need to improve assessment systems to better meet the needs of students. When we refer to innovation in assessment, we mean moving to assessment systems that support student-centered learning and more authentically engage students in deeper learning to create equitable and productive futures for all children. We have worked with states that have considered applying for CGSA but chosen not to do so, those that have applied and been denied, and those that were awarded grants. We recently published a report based on an extensive analysis of CGSA and the Innovative Assessment Demonstration Authority (IADA), [*Clearing the Path for Assessment Innovation: The Role of Federal Policy*](#). From these experiences, we have learned a lot about what has made CGSA successful and where there may be opportunities to make changes within the current statutory framework that could foster greater impact. As you prepare for the next round of CGSA, we urge you to consider the following:

- **Include an explicit focus on innovation as a priority, with a clear path to support scaling and sustainability.** Past CGSA awards have supported innovative approaches and embedding a clear commitment to innovation will provide a more efficient pathway for states that want to pursue new ideas. Given the Department's recent letter clarifying the requirements of IADA, deliberately connecting IADA and CGSA by making innovation one of the priorities could provide much-needed funding to states that want to pursue IADA. States could, for example, apply for CGSA funding that explicitly supports an initial planning period on the path to IADA. As part of the push for innovation, one of the competitive priorities for CGSA could focus on assessments that better measure deeper learning. For states that want to eventually scale their approaches statewide, USED should partner with them to create a path for scaling statewide when it is

appropriate to do so and provide technical assistance throughout the process to support states in achieving this goal. Deliberately aligning CGSA and IADA, as well as other USED' authorities helps to create a clear path for a successful new approach to assessment.

- **Reconsider the award cap.** Meaningfully designing and implementing new assessment approaches requires significant investment in time and money. In the recent rounds of awards, the maximum award size was \$3,000,000 over up to 48 months, regardless of whether it was a single- or multi-state application. While this level of funding can seed new ideas, innovation at the magnitude our educators need and students deserve requires significantly more investment. The limited award amount can be particularly discouraging for larger states that may be seeking to improve their assessment systems or multistate applications, which have enabled states to both leverage resources and more efficiently spread promising practices. While we appreciate that there is a limit on the overall pool of funding for this year's competition, we encourage you to consider how to best balance the number of states you support with the impact states are able to make given the amount of funding they receive.
- **Allow sufficient time.** Redesigning assessment systems that promote future-focused and student-centered learning systems that more authentically engage students in deeper learning takes time. State leaders need sufficient time for both planning and implementation, including allowing for an expansive view of what scaling an assessment system statewide may mean so that states can adopt sufficient flexibility to grow toward statewide implementation when that is the intent. The Department should explicitly support and promote planning time to signal its openness to having states establish reasonable timelines for systems transformation.
- **Encourage equity in innovative programs.** Innovative assessment systems developed pursuant to CGSA must meet the needs of diverse student populations, taking into account considerations such as important requirements around accessibility and cultural responsiveness. As part of the development process, state leaders can work with local communities using an equity-centered approach with the goal of engaging a diverse group of users in the assessment design from the start. The Hawai'i Department of Education, for example, is using CGSA funding to create a comprehensive assessment program, a core component of which is the development of high-quality, classroom-embedded, and student-centered, culturally responsive performance assessments.
- **Support innovation for assessment *and* accountability.** A comprehensive approach to supporting assessment innovation must also include opportunities for accountability innovation, recognizing the inextricable link between assessment and accountability.



CGSA funding is critical for states that want to advance their assessment and accountability systems. We appreciate your work to make the program successful and will support you and state leaders to continue to improve our assessment systems using the next round of CGSA funding. We stand ready to partner with you as you move this process forward and are happy to meet with you to discuss these recommendations in more detail.

Sincerely,

Aurora Institute
Center for Assessment
Center for Innovation in Education
Great Schools Partnership
KnowledgeWorks