From:	Driscoll, Gary
To:	RaceToTheTop.Assessment
Cc:	Zubenko, Vladimir; McNulty, John; Hansen, Eric; Hoag, Regina
Subject:	Comments Regarding The Framework for Interoperability of Student Assessment Technology
Date:	Monday, November 07, 2011 5:47:45 AM
Attachments:	Public comment final draft V7.docx

Attached are our public comments regarding the framework. We focus on four key areas:

1. Assessment Items – This involves items, content development, and item banking
2. Assessment Instruments – This involves test delivery and scoring
3. Student Profile –This involves student characteristics (student profile), test registration, and administration.
4. Assessment Results – This involves reports for teachers, parents, students, and others.

ETS Comments on the "Framework for Interoperable Assessment Technology Standards"

Submitted November 7, 2011

Purpose

This document is ETS's IMS and SIFA representatives response to an October 18, 2011 invitation to the public from the U.S. Department of Education (ED) to comment on a document entitled "Framework for Interoperable Assessment Technology Standards," hereafter called the "framework document." Specifically, the invitation was to comment on "whether ED has identified the key areas for interoperability standards in assessment items and student data" (Letter from Susan Weigert, ED, October 18, 2011). As suggested in the invitation, the framework document is a milestone in progress toward the point at which ED will approve interoperability standards for "assessment items" and "student-level data" for "next-generation assessment systems" under several programs, including the Race to the Top Assessment program.

Identification of Key Areas

We believe that ED has correctly identified the key areas, specifically, the following:

1. Assessment Items – This involves items, content development, and item banking

2. Assessment Instruments – This involves test delivery and scoring

3. Student Profile –This involves student characteristics (student profile), test registration, and administration.

4. Assessment Results – This involves reports for teachers, parents, students, and others

5. Infrastructure – This involves data transportation and security

We believe that interoperability standards have important roles in the various touch points between each of these areas. However, in terms of approval of interoperability standards, we believe that the greatest focus should be given to the first ***four*** of these areas.

Standards That Address the Touch Points Between Areas

The figure below illustrates key touch points between the first four of the areas and recommends specific standards of the IMS Global Learning Consortium (IMS) and the Schools Interoperability Framework Association (SIFA). Specifically:

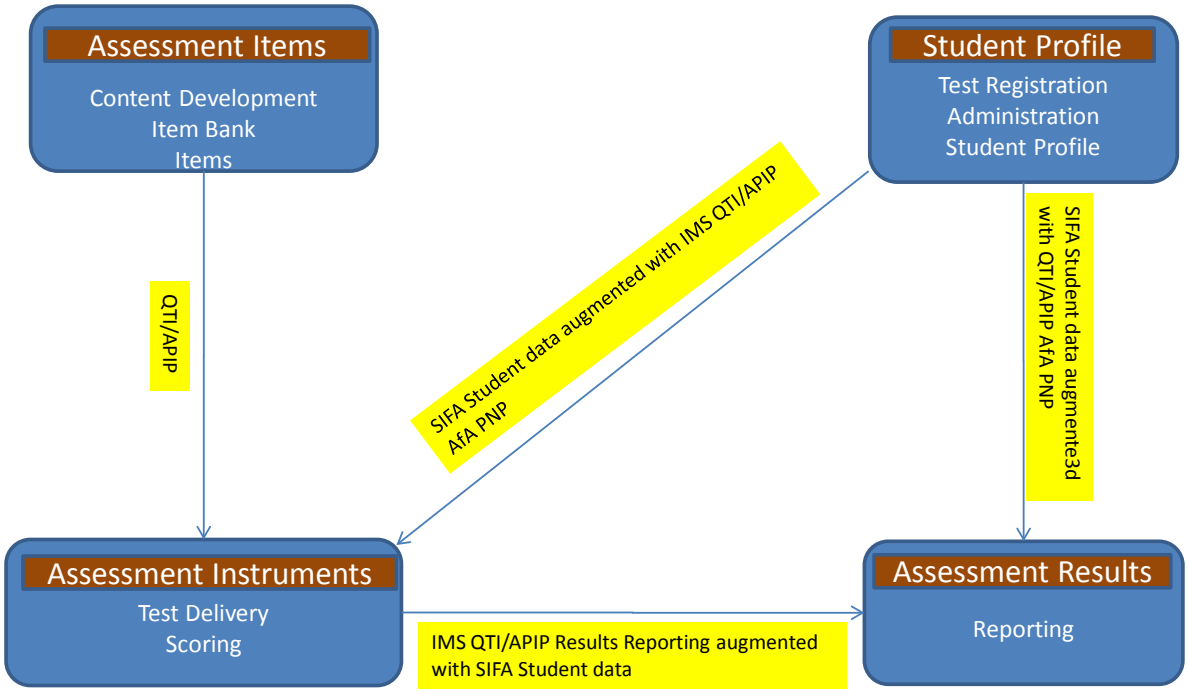
1. For the flow between Assessment Items and Assessment Instruments, we recommend the IMS QTI/APIP standards.

2. For the flow between Assessment Instruments and Assessment Results, we recommend the IMS QTI/APIP Results Reporting standards augmented with the SIFA Student Data standards.

3. For the flow between the Student Profile and Assessment Instruments, we recommend the SIFA Student Data standards augmented with QTI/APIP AfA PNP.

4. For the flow between the Student Profile and Assessment Results, we recommend the SIFA Student Data standards augmented with QTI/APIP AfA PNP

Four Priority Areas and Recommended Standards



Notes for the Figure:

1. APIP stands for "Accessible Portable Item Protocol," an IMS specification for accessible assessment items. It was formerly called Accessible Portable Item Profile.

2. By the term "QTI/APIP AfA PNP" we mean the version of the IMS Access for All (AfA) Personal Needs & Preferences (PNP) that has been extended (tailored) for use as part of the APIP specification; this special version of AfA PNP has features that are not present in the version from which it was derived (IMS AfA PNP v2.0). The APIP specification is based not only on the IMS AfA v2.0 specification, but also on three other IMS specifications: (a) Question & Test Interoperability (QTI) v2.1, (b) Content Packaging (CP) v1.2, (b) Common Cartridge (CC) v1.0. The APIP specification's relationship to the QTI specification has become even closer recently because a decision has been reached to make the APIP specification part of the QTI specification.

IMS/SIFA Collaboration

In order for the foregoing recommendations to become practical and effective solutions, IMS and SIFA must conduct an analysis to integrate the QTI/APIP Results Reporting and QTI/APIP AfA PNP IMS standards with the SIFA Student Data standards. ETS is currently participating in both the IMS and SIFA standards organizations. ETS staff members were active participants in joint IMS/SIFA meetings in which the need for an integration of the relevant standards has been discussed, with a goal of making the use of these standards as seamless as possible to implementers and users of next-generation assessments.