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Subject:	Response to Interoperable Assessment Technology Standards
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Race to the Top Assessments
US Department of Education

Dear Reviewers:

We strongly agree with the need to develop a set of technology standards for managing and delivering students' assessments. It will be extremely important going forward that we keep our integration, "plug-in", and "switching" costs low so we can effectively implement and maintain the assessment system(s) while using the results for instruction. As we know from experience, system integration issues such as those relating to managing student profiles or accessing assessment data can deplete instructional resources by disproportionately focusing on the operations of the assessment. Allowing seamless transfer of student profile and assessment data between systems will allow us to "plug" into other systems that have current or future solutions for leveraging data for instruction and professional development. Finally, the inability to transfer easily between systems significantly decreases our ability to leverage innovative or more cost effective solutions.

We reviewed and agree upon the interoperability issues outlined by ED in this document. The "Areas without current standards" hit the key issues and shortfalls with the standards. The lack of standardization around "standard" formats renders them useless on a large scale. Unifying those formats and agreeing to common data elements are essential for interoperability and efficient data management.

We support the standardization of Data, Transportation, Activation, and Security formats, though the technology options to support those standards should provide options to allow for integration with varying technology stacks, e.g. including both XML and JSON as options within the standard. Security standards should allow for integration of teacher applications into single sign-on architecture.

Two potential concerns were not addressed in the original set of technology standards:

1. Standardization of scoring is considered "beneficial but not essential." If scoring includes using a common scale and evaluation of the assessments, then we are not sure how to implement a standardized assessment model with various methods of scoring. There are a myriad of issues that could potentially stem from this. From a technical aspect, it could impede our ability to seamlessly analyze and manage data and leverage other state or vendor solutions that may have built around a different scale.

2. There is no reference to staff or class data. I'm not sure to what extent this is an issue, but on a high level, most of the instructional application of data is done in the classroom. If we can't easily enter, transfer, or access teacher/class data, it could impede our ability to manage the administration and instructional application of the assessment.

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