

Considerations for Assessment Flexibility Approaches

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The Elementary and Secondary Education Act (ESEA) of 1965 and the Education Flexibility Partnership Act of 1999, as amended by Every Student Succeeds Act (ESSA), provide multiple opportunities for States and districts to decide how to best meet the needs of the students they serve. One key area of flexibility is Challenging Academic Standards and Assessments (ESEA section 1111(b)). As criteria for Title I, Part A funding, States must develop challenging academic content and achievement standards and implement a statewide set of annual academic assessments in mathematics, reading or language arts, and science.

One option the U.S. Department of Education (ED) offers states to meet this requirement is the Innovative Assessment and Accountability Demonstration Authority. The Innovative Assessment Demonstration Authority (IADA) offers States the opportunity to apply to the U.S. Department of Education to “implement an innovative assessment system in some of its districts instead of the statewide assessments, with the goal of scaling up the innovative assessment for statewide administration” (U.S. Department of Education, 2018). States also have flexibility beyond IADA in the design and use of their assessment and accountability systems.

To support informed decision-making on flexibility options, this report: (1) describes the potential innovative assessments identified in the IADA; (2) summarizes existing state IADA efforts; and (3) presents possible next steps and issues to consider when deciding on whether to implement an innovative assessment system.

Innovative Assessment Systems

The IADA identifies five potential assessment types that may be included in an innovative assessment system: competency-based assessments, instructionally embedded assessments, interim assessments, cumulative year-end assessments, and performance-based assessments. In this section, we briefly describe each of these assessment types.

Competency-Based Assessments

Competency-based assessments allow students to demonstrate that they have learned the expected knowledge and skills (i.e., a competency) needed to progress to the next academic content, grade, or level (Troppe et al., 2023, p. 18). Competency-based assessments show progress toward mastery-driven learning rather than seat time or time on a task. States approach competency-based assessments by emphasizing mastery-driven learning over seat time, supported by policies such as proficiency-based credits, innovation zones, and multiple graduation pathways. These assessments often include performance tasks, portfolios, and project-based evaluations, which are used to demonstrate competency for graduation. States have also developed learning targets most often through “portraits of a learner” or “profiles of a graduate.” In some cases, the assessments are aggregated into a statewide summative score for accountability. Interpreting competency-based assessment results requires consistent and comparable measures across districts. State agencies must consider validity and

reliability and establish clear guidelines for aggregating data into accountability metrics.

Instructionally Embedded Assessments

Instructionally embedded assessments are assessment tools that are part of regular classroom instructional activities which allow teachers to check on students' understanding of the content to inform their instruction. Some approaches to instructionally embedded assessments involve the use of computer-delivered alternate assessments that are intended to integrate classroom instruction and assessment in a cycle throughout the year. Most instructionally embedded assessments are open-ended so teachers can see what students are thinking, have close ties to classroom curricula, focus on one standard or a small group of related standards, are given in a timely manner, and are designed so that teachers can see what questions and problems students are responding to. From this, teachers can compare students' work to a typical progression of learning, look through the work for connections or issues that need addressing, and consider how to move forward instructionally for the whole class, a small group, or individual students.

Interim Assessments

Interim assessments are commonly used at the classroom, school, and district levels to gauge student understanding and inform instructional decision-making. They can serve as a tool for monitoring progress toward year-end goals and as an indicator of progress toward academic standards or benchmarks as well as end-of-year achievement. When aligned to standards and instruction, interim assessments can be used formatively to help teachers understand and meet student learning needs. Interim assessments can be commercially produced (e.g., by companies such as the NWEA [Northwest Evaluation Association], Pearson, or the Smarter Balanced Assessment Consortium] or developed locally by states, districts, and schools. They may also be based on state learning standards and aligned with an end-of-year summative assessment. Many states and districts are experimenting with ways to use interim assessments in their accountability systems, such as using a series of interim assessments aligned with state learning standards in place of an annual summative test (through-year assessment). Interim assessments are typically administered in Fall, Winter, and Spring. Individual assessments may be comprehensive (full domain) in that they assess all learning standards and are measured on a vertical scale. This allows test scores within and across years/grades to be validly compared. Alternatively, they may be based on a distributed test blueprint and measure subsets of the learning standards in different periods. This approach enables interim scores to more closely resemble classroom assessments, competency-based assessments, and instructionally embedded assessments. In addition, some states and assessment vendors (such as SBAC) offer competency tests in addition to interims and summative assessments. These assessments can be fully linked to the assessment blueprint but focus on subsets of learning standards.

Cumulative Year-End Assessments

A summative assessment is an evaluation used to measure student learning at the end of an instructional period, typically the end of the school year. Its primary purpose is to assess the extent to which students have achieved the intended learning outcomes or standards for the entire instruction period. The No Child Left Behind Act (enacted in 2001) and Every Student Succeeds Act (enacted in 2015) requires all students to be assessed in math and English language arts (ELA) in grades 3-8 and in one high school grade. School and district performance with respect to student achievement is typically reported in school report cards and used to satisfy state and federal accountability requirements. Most states also use state summative test scores to measure student growth and report school-level measures of growth in school report cards. One of the advantages of reporting growth as well as proficiency is that the former metric allows school to demonstrate success in advancing student learning in all schools, including those that serve students with low prior proficiency. End-of-year

summative test scores may also be used in early warning systems to identify students with non-proficient scores. To produce test scores that are comparable across school and districts, all summative assessments (and most interim assessments) require that all students are administered the assessment in the same testing window. In some through-year assessment systems incorporating interim assessments, the end-of-year interim assessment is a summative assessment based on all grade-level learning standards. Summative (and interim) assessments are typically administered to most students online.

Performance-Based Assessments

Performance-based assessments allow students to demonstrate mastery of academic content standards (i.e., what they should know and be able to do) by performing a specific task or series of tasks (Troppe et al., 2023, p. 18). States vary in their approach in using performance-based assessments with some mandating them statewide, while others allow districts to opt in or use them as alternatives to traditional tests. Common examples of performance-based assessments include problem-based learning tasks, portfolios, and research and capstone projects, which are often supported by rubrics and calibration processes to ensure consistency. Most states that allow performance-based assessments use them locally for graduation or instructional purposes, but they do not combine them into a single statewide summative score. The major problem with using performance-based assessments as the sole measure of student learning is that they generally are quite time consuming and thus make it impossible to measure learning across the full assessment domain. Many summative and interim assessments include limited numbers of performance tasks to increase the validity of the test. States face challenges with scalability, resource demands, and maintaining technical quality and comparability.

Federal Innovative Assessment Demonstration Authority Efforts

Since the authorization of the IADA, eight states applied to the IADA and U.S. Department of Education for approval to develop an innovative assessment system (Table 1).

Table 1. Assessment Types in Innovative Assessment Demonstration Authority Proposals

State	Application	Assessment	Status
Missouri	2025	Competency-based, interim, performance-based, instructionally embedded (mathematics only)	Application approved in July 2025, and work is in progress.
Massachusetts	2020	Performance-based, competency-based, cumulative year-end	Piloting began in grades 5 and 8 during the 2021–2022 school year. Field testing tasks and questions span two years (2025–2026), with all fifth and eighth grade students completing one performance task. The assessment is scheduled to be fully operational in 2027. The state may explore expansion to other subjects and grades.

State	Application Year	Assessment Types	Status
Indiana	2020	Interim, performance-based*	Not awarded
Hawaii	2020	Instructionally embedded, cumulative year-end	Not awarded
North Carolina	2019	Competency-based, interim	North Carolina intended to take the NC Personalized Assessment Tool and NC Check-Ins 2.0 to scale in the 2024–2025 school year. However, according to the Department of Public Instruction website, both assessments are still under development.
Georgia	2019	Competency-based, interim, performance-based	Withdrew from IADA in 2023 when partners indicated they would not be able to implement the pilot. Reported challenges in prior years included cost, comparability, and assessment for accountability.
New Hampshire	2018	Competency-based, interim, performance-based (GMAP Pilot), instructionally embedded (Navy)	Withdrew from IADA in 2022 due to cost, administrative burden, and assessment quality concerns.
Louisiana	2018	Competency-based, instructionally embedded, interim, and cumulative year-end options	Districts opted in to the English Language Arts Guidebooks Innovative Assessment Program (IAP) for grade 7 beginning in the 2021–2022 school year and for grades 6–8 beginning in the 2022–2023 school year. A second component of the IAP aligned to the Wit and Wisdom curriculum was suspended in 2023 due to lack of participation. The status of the IAP in 2026 is unclear.

* Indiana’s IADA application focused on an alternate assessment for the students with significant cognitive disabilities. The features in the table were identified as potential options in their application; they proposed using year 1 for research and development into possible assessment designs.

Six of the eight states who applied to IADA were approved:

- » **Missouri:** Missouri’s approved IADA assessment system intends to use a through-year assessment model, the Success-Ready Student Assessment (SRSA). The system will include a minimum of three assessments per year in ELA and mathematics, each of which will be aligned to the Missouri Learning Standards. Feasibility testing of the new assessment will begin in the 2025–2026 school year with up to five local education agencies.
- » **Massachusetts:** Massachusetts began piloting its IADA science program through performance-based assessments in grades 5 and 8 during the 2021–2022 school year. These assessments are designed within the state with teacher involvement. The pilot included two sessions: (1) an

abbreviated version of the operational statewide Massachusetts Comprehensive Assessment System (MCAS) Science and Technology/Engineering assessment and (2) innovative performance tasks developed under the IADA program. The process included field testing tasks and questions over a two-year period.

- » **North Carolina:** North Carolina's IADA system, the North Carolina Personalized Assessment Tool (NCPAT), included two components. The first, NC Check-Ins 2.0, comprised three interim assessments designed to provide actionable performance feedback about students as well as a reliable estimate of student's end of grade assessment performance. The second was a multistage adaptive summative (flexible summative) assessment used for statewide accountability purposes.
- » **Georgia:** Georgia used IADA to work on two different innovative assessment systems: the Georgia Innovative Assessment Pilot Program (GMAP Pilot) and the Navvy. The GMAP Pilot was envisioned as a through-year computer-adaptive system using items from NWEA MAP benchmark assessments and Georgia's annual summative assessment Navvy was also envisioned as a through-year assessment system, with on-demand assessments providing timely diagnostic data about students aligned to the Georgia Standards of Excellence.
- » **New Hampshire:** New Hampshire's Performance Assessment of Competency Education (PACE) was envisioned as a competency-based approach to assessing student skills and knowledge in specific grades and subject areas. PACE common performance tasks were locally developed by staff from participating schools and districts, with scores constructed from (1) teacher judgments at the end of the school year regarding which achievement level best describes each of their students; and (2) end of year competency scores for each student.
- » **Louisiana:** Louisiana's Innovative Assessment Program (originally named The Louisiana Educational Assessment Program 2025 Humanities) was designed as a through-year assessment aligned to state curriculum. Students took unit-based assessments in fall, winter, and spring which were combined to produce single summative scores linked to the statewide assessment.

Table 2. Considerations in the Design and Use of Assessment and Accountability Systems

Assessment Feature	Considerations
Can student assessment outcome data be better used to guide classroom instruction?	Student achievement and growth outcomes (by grade, by subject) can be translated into recommendations for classroom instruction that align with state standards, individual district curriculum, and individual school instructional programs.
Can student outcome data be used to differentiate student support based on individual learning needs?	SEAs can develop a system for identifying student needs, classifying students into groups by needs, and tracking their progress/growth across the school year. This will allow districts to provide support based on initial needs and modify support as needs change across the school year and across school years. Systems can be aligned with student learning objectives, early warning systems, and other metrics.
Can student outcome data be routinely used to evaluate the effectiveness of instructional programs and educational innovations?	Data on student outcomes and school experiences can routinely be used by teachers, schools, districts, and states. Student outcome data could also be used to document student and school needs and provide the foundation for adopting or experimenting with scientifically based instructional programs to meet the needs of all students.
Can actionable, comprehensive data on student outcomes and experiences be made available to educators to support student success?	SEAs can develop data analytics tools and data dashboards to enable educators to measure and support individual students' progress toward meeting state standards and college and career readiness. The data system could include information on: » Student achievement and growth outcomes, » Progress goals, » Student learning objectives, » Early warning metrics, and » Classroom-wide and differentiated student instruction. Such a system could use AI to help educators make efficient and high-quality use of this data (distinct from using AI to assist instruction).
Is it possible to develop assessments that better measure college and career readiness?	State assessments that prioritize measurement of achievement in math and ELA, even if supported by performance and competency-based assessments, may fail to capture all skills needed for success in college and, especially, the labor market. SEAs can engage with practitioners and assessment vendors to explore assessments that more fully measure college and career readiness. These assessments could include performance-based and competency-based assessments aligned with alternative pathways and career and technical education and training.

Assessment Feature	Considerations
What are the options for producing a summative test score?	Summative test scores may be based on a final end-of-year assessment (either a standard end-of-year summative assessment or an end-of-year interim assessment) which measures the full domain of learning standards or a combination of an end-of-year assessment and interim tests scores within the school year. This latter option potentially allows the end-of-year assessment to include fewer test items, but warrants other considerations: Combined test scores are not well-suited to measuring student growth since, for example, the fall interim disproportionately reflects learning from the prior school year. Including test scores from fall and winter assessments in summative accountability measures increases the stakes on these assessments which potentially amplifies the incentive to “teacher to the test.” Interim assessments that test only some learning standards on each test can be misaligned to instruction if teachers and schools adopt different pacing strategies for teaching learning standards.
Should measures of overall school performance prioritize student achievement or growth in student achievement?	Growth and achievement proficiency measures serve different purposes. The two measures should be reported separately, but can also be combined into a single measure, although this brings risk of creating confusion on what the combined measure means. Growth measures: » Take account of what students know at the beginning of the school year and measure the increase in achievement during the school year. » Capture school contributions to changes in achievement over time. They allow high-growth schools to be identified as high-performing schools even if they serve student populations with low prior achievement. High-growth schools that disproportionately serve, for example, high poverty and Native American students are often incorrectly identified as low-performing schools. » Can be structured to provide fair measures of small and large schools. » Provide incentives for educators to work in the most challenging educational environments. » Require student test score data from at least one prior year. Achievement proficiency measures: » Reflect learning accumulated over students’ lifetimes and thus reflect contributions from current and prior schools, early childhood experiences, parents, and communities. » Are strong predictors of future college and career success and can be incorporated into early warning systems. » Do not require prior-year test score data but typically are computed using only students enrolled in a school for the full year.

Assessment Feature	Considerations
Are standard school accountability measures based on student achievement and growth fair to small schools?	State accountability metrics based on average measures of student outcomes tend to hide differences in student outcomes between small and large schools. As an example, school averages of student growth universally exhibit the following: large schools tend to be overidentified as medium-performance schools whereas small schools tend to be overidentified as exceptionally low or extremely high performing schools. Alternative measures of school performance, neutral with respect to school size, can be readily constructed using the same data currently used to measure school-level growth and proficiency.
Can school contributions to student attendance outcomes be measured?	Growth-type measures can be created for student attendance, thereby allowing schools with high-need students to be identified as high-performing schools in cases where they out-perform schools with comparable students.
What are options for using computerized testing and adaptive testing to measure student achievement?	Computerized tests often use computer-adaptive testing (CAT) to allow students with varying levels of achievement to be assessed using test items that are aligned with their own proficiency level. Adaptive testing tailors exam difficulty in real-time based on a test-taker's answers, presenting harder questions after correct responses and easier ones after incorrect ones, creating personalized tests that are more efficient and accurate by targeting a person's ability level precisely. This technology uses algorithms to select items from a large bank of test questions, stopping once a precise score is achieved. The test items included in CAT systems may focus exclusively on grade-specific learning standards but may also include items at lower and higher grade levels to provide more informative measures of student achievement for all students. Test score and growth metrics reported to the federal government under ESSA rules must be based only on within-grade standards, though states may use other measures in their state report cards.
Cost (e.g., to hire a development vendor)	To develop any new assessment systems, data collection programs and/or data processing systems, SEAs would need to engage a vendor with expertise in each type of tool and/or product that it is interested in developing.

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