



2025 Policy Priorities

What States Can Do to Improve Assessment and Accountability Systems

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The National Education Association (NEA), the nation's largest labor union, is committed to advancing the cause of public education. NEA's more than 3 million members work at every level of education—from preschool to university graduate programs. NEA has affiliate organizations in every state and in more than 14,000 communities across the United States.



The National Center for Fair & Open Testing (FairTest) was founded in 1983 and works to advance quality education and equal opportunity by promoting fair, open, valid, and educationally beneficial evaluations of students, educators, and schools. FairTest also works to end the misuses and flaws of testing practices that impede those goals.





BACKGROUND

Statewide assessments, mandated by the Every Student Succeeds Act of 2015 (ESSA),¹ aim to identify education inequalities and promote high standards and meaningful reform. However, these assessments are often used to justify harsh interventions that harm students and disrupt learning.

Over recent decades, state and local education agencies (SEAs and LEAs, respectively) have upped the stakes of statewide assessments, often violating measurement principles and using results inappropriately to make high-stakes decisions, like grade retention, promotion, graduation, grading schools, and educator compensation. Still, many public education advocates consider the mandates for statewide assessment and accountability systems as guardrails for civil rights to be important components of federal law since the publication of statewide assessment results promote transparency and identify opportunity gaps.

By defining the values that underpin how we assess student learning, we can move toward a system that is equitable, well-rounded, and effective.

Learn more about NEA's Principles for the Future of Assessment, which describes our vision for collaborating with the community, championing expertise of educators, prioritizing student self-efficacy, generating and employing well-rounded evidence, and ensuring all students opportunities to fully access and participate in high-quality, meaningful, culturally affirming assessment.

¹ The federal K–12 education law of the United States, the Elementary and Secondary Education Act (ESEA) was signed into law in 1965 by President Johnson. The act has undergone several reauthorizations. The most recent reauthorization was the Every Student Succeeds Act (ESSA) of 2015, signed into law by President Obama. ESSA includes provisions that seek to advance equity by upholding protections for marginalized and high-need students across the United States. For consistency, this paper will use the acronym "ESSA" in reference to the federal K–12 education law. See Every Student Succeeds Act, 20 U.S.C. § 6301 (2015). https://www.congress.gov/114/plaws/publ95/PLAW-114publ95.pdf.





THE CURRENT SITUATION

On March 20, 2025, President Trump signed an executive order calling for the dismantling of the U.S. Department of Education (ED), which administers ESSA and monitors state compliance with assessment and accountability provisions of federal education law.² The Executive Order directed the Secretary of Education to "facilitate the closure of the Department of Education and return authority over education to the states and local communities."

President Trump and top administration officials have been promoting the conversion of federal education funding into block grants to the states—a key step toward dismantling ED. If Title I funding is transformed into a block grant, it is unclear what impact this might have for federal assessment and accountability requirements; however, the general expectation is that this action would reduce oversight and make it much less likely that funding will reach the students it was intended to help.

A question that many public education partners across the landscape are grappling with is: Will changes to the federal government's role in education provide a unique opportunity for states to pivot away from annual high-stakes statewide assessment and explore more well-rounded, innovative approaches to understanding student learning and school quality?

Federal and state laws governing standardized tests can be overly burdensome. SEAs and LEAs wind up spending too much time and money preparing for and administering statewide standardized tests. These required activities hoard school resources, including educators' instructional time, and physical space, crowding out time dedicated to the kind of assessment that aligns more directly with the curriculum and enhances the learning process. However, SEAs and LEAs have a number of flexibilities under federal law to incubate and foster high-quality,

"When tests are used in ways that meet relevant . . . educational standards, students' scores provide important information that, combined with information from other sources, can lead to decisions that promote student learning and equality of opportunity When test use is inappropriate, especially in

When test use is inappropriate, especially in making high-stakes decisions about individuals, it can undermine the quality of education and equality of opportunity....

This lends special urgency to the requirement that test use with high-stakes consequences for individual students be appropriate and fair."

—National Research Council, High Stakes: Testing for Tracking, Promotion, and Graduation, p. 4 (Jay P. Heubert & Robert M. Hauser eds., 1999).³

² Improving Education Outcomes by Empowering Parents, States, and Communities - The White House (March 20, 2025).

³ National Research Council. 1999. High Stakes: Testing for Tracking, Promotion, and Graduation. Washington, DC: The National Academies Press. https://doi.org/10.17226/6336.





well-rounded assessment practices. Therefore, they should consider the full array of policy levers when identifying assessment and accountability innovations.

States also should consider options for driving bottom-up reforms through top-down support. The purpose of this document is to outline a number of potential pathways for reform and innovation so that state and local affiliates can partner effectively with SEAs and LEAs to drive student-centered policy and practice changes.

Before state and/or local affiliates advocate that SEAs or LEAs pursue federal assessment and/or accountability waivers, they should first complete an analysis of whether a waiver is required. If the answer is yes, then the affiliate(s) should partner with the SEA or LEA to outline the steps they will take to keep the civil rights intent behind ESSA intact. Furthermore, waiver requests should be predicated on a thorough analysis of SEA's/LEA's education priorities, existing opportunities for innovation, and local capacity.





KEY TAKEAWAYS

State and local education agencies should align their proposals with foundational civil rights goals of public education law that identify opportunity gaps and gather information to help address inequities, especially for underserved communities and marginalized student groups. Both federal and state education agencies should dedicate resources to support SEAs and LEAs in developing and scaling innovative systems of assessment and accountability. This can be accomplished through multiple pathways, including targeted waivers, programs, and grants.

Similarly, SEAs and LEAs should improve accountability systems to expand beyond test-based indicators to include indicators about students' learning experiences, opportunities, and engagement; information about resources and support for educators; and school funding. SEAs and LEAs can advance ESSA's civil rights intent by fostering deeper learning, uplifting universal skills and competencies, and supporting culturally sustaining practices. To accomplish this, SEAs and LEAs need to prioritize meaningful assessment system innovations and broaden accountability measures to include various inputs and outcomes that provide insights on equitable opportunity and school quality. Public education interest holders—including and especially educators, students, and families—must be engaged in authentic and meaningful collaboration on all proposed reforms.





SUGGESTED POLICY AND PRACTICE PRIORITIES FOR 2025

NEA's priorities for ensuring that all students have access to an equitable, balanced system of asset-based assessments are outlined in the <u>Principles for the Future of Assessment</u>. The recommendations herein are meant to be aligned with these underpinning documents and responsive to the current environment.

Our proposed priorities are as follows:

- » De-escalate the stakes of statewide and other large-scale assessments at various levels for students, schools, and districts;
- » Decouple statewide and other large-scale assessment results from high-stakes decisions about individual students, educators, and schools;
- » Reduce disruptions to student learning caused by preparation for and administration of statewide and other large-scale assessments;
- » Increase educator preparedness and professional learning opportunities to support educator readiness in the preparation, implementation, and evaluation of a diverse array of assessment strategies (in other words, increase assessment literacy among educators);
- » Design equitable, balanced assessment systems that include a variety of high-quality assessments suited to distinct purposes (i.e. assessments of student learning, for student learning, and as student learning) to help drive instruction and policymaking at various levels;
- » Diversify the assessment methods utilized by educators and local and state education agencies to generate a more well-rounded understanding of student achievement (in particular, increase the use of high-quality, performance-based assessment strategies from the classroom to the state level);
- » De-center assessment-based indicators in state and local accountability systems and increase the use and weight of school quality indicators that focus on equity, access, and student learning experiences and opportunities, including support of forum-driven local school quality dashboards; and
- » Ensure that all students' learning is assessed using multiple measures and that no decisions about students' education are driven by a single test score.





To advance these priorities, NEA and FairTest recommend that state affiliates explore all potential pathways when pursuing improvements to assessment and accountability systems, from local education agency decisions to requests for a reprieve from federal requirements. This document proposes a variety of options for advancing equitable, student-centered improvements to policies and practices that govern assessment of student learning and understanding school quality. This document also includes a list of resources to assist state and local affiliates and partners in pursuing reforms.

To learn more about assessment and accountability innovation and to identify options that are best tailored to meet the needs, values, and interests of your affiliates and/or education agencies, contact futureofschools@nea.org or fairtest@fairtest.org.





CALLS TO ACTION

Join the NEA's Assessment Action Network

Connect with state and local NEA affiliates across the country who are engaged in assessment and accountability advocacy on <u>NEA edCommunities</u>, an open professional learning network created for educators to exchange ideas and resources with thousands of education professionals.

Subscribe to FairTest's Newsletter

Stay up-to-date on the latest media coverage and informational resources on assessment and accountability. Email fairtest@fairtest.org to subscribe.

Join the Assessment Reform Network

The Assessment Reform Network is a national project created to support parents and families, educators, students, and others who are working to end the overuse and misuse of standardized testing in public education and promote authentic forms of assessment. To join, email fairtest.org and check out the FairTest Fact Sheets for information on organizing, messaging, and the nuts and bolts of standardized testing.





CONCLUSION

Regarding ESSA enforcement, the posture of the Trump administration remains an open question. This gives states and districts significant room for assessment and accountability innovation. NEA affiliates should encourage states and districts to pursue options that create more balanced systems of assessment and accountability, benefiting school quality and enhancing opportunity for marginalized populations.

There are also provisions in ESSA that can potentially be used in lieu of targeted waiver requests. Affiliates, SEAs, and LEAs should proceed in ways that enhance assessment of and for learning and broaden accountability systems to incorporate input and outcome measures beyond test scores. The work and purpose of SEAs and LEAs in designing and implementing accountability systems must focus on how well schools are serving the real needs of students and communities across race, place, background, and ability.





RECOMMENDATIONS FOR ASSESSMENT AND ACCOUNTABILITY REFORM

Measures Unrelated to ESSA

State and local education agencies (SEAs and LEAs, respectively) can take a number of actions to improve assessment and accountability systems, including strengthening professional practice, understanding student progress, and evaluating programmatic effectiveness through the development of co-created systems for measuring school quality.

Every student—regardless of race, origin, or background—deserves to have their learning assessed fairly, in a way that is based on real-life skills and knowledge. But our current standardized testing system is both inequitable and ineffective at gauging what students know, and it's failing educators too, making it nearly impossible to manage the high-stakes tests and foster true learning at the same time.

The good news is that there are alternatives—ones that let students demonstrate their learning through critical thinking, problem-solving, collaboration, and the application of knowledge. Learn more about how performance-based assessment is propelling student success around the country by reading NEA and FairTest's Spring 2023 Convening: Promoting Equity and Excellence Through Performance-Based Assessment.

Invest in Systems That Support Instructionally Relevant Classroom Assessment

State policymakers often claim that they want statewide assessments to be "useful" for driving instruction; however, no single assessment can serve multiple purposes effectively. NEA and FairTest recommend SEAs provide LEAs and educators with resources, support, and ongoing professional learning so that they are well-versed in high-quality classroom assessments. States should prioritize helping LEAs and educators to align a variety of assessment modalities, such as authentic and performance-based assessments, to learning targets and curriculum.





Develop Portrait of a Graduate⁴ and Create Multiple Pathways for Graduation

States can create more equitable, well-rounded policies and protocols for certifying students' readiness for graduation. For example, states may incorporate course requirements; include skills-based diploma badges and endorsements; develop work-based, career and technical education (CTE), and apprenticeship pathways; and formalize requirements for students to demonstrate their knowledge and competencies through performance-based assessment approaches, such as capstones, that uplift student voice and choice. The goal of these changes should be to ensure that students are graduating with the skills, habits, and knowledge that align with the expectations outlined in the collective vision summarized in Portraits of a Graduate.

Support Innovations in Assessment and Local Reporting to Measure What Matters

States can promote the use of high-quality, educator-created performance-based assessment by developing a statewide system of support for locally driven models that includes professional learning, quality curricular materials, and exemplars.

Such support may include the following:

- » Developing a pilot network of districts and schools that will develop effective performance-based learning and assessment models and take part in intensive research, development, and implementation processes focused on scaling assessment and accountability systems statewide.
- » Supporting shared communities of practice.
- » Creating banks of performance tasks and assessments using models developed by LEAs.
- » Facilitating professional development opportunities, including demonstrations of effective teaching and performance-based assessment practices by pilot network members.
- » Supporting rubric design and standard setting by LEAs to develop systems of assessment and accountability. This includes sponsoring rubric creation, conducting inter-rater reliability exercises to ensure commonality of scoring, and engaging in an iterative process of setting benchmarks for various competencies as well as content and skill mastery.
- » Partnering with universities and research institutions to study and support practice and performancebased assessments and their use for the purposes of accountability.

⁴ A Portrait of a Graduate (POG) is an expression of a state or local education agency's collective vision for student success that is created in partnership with education interest holders, including families, community members, school leaders, and students. POGs incorporate academic and functional knowledge, skills, and competencies that students need to achieve their full potential. Read more here: Portraits of a Graduate





- » Developing, together with LEAs and their communities, criteria for competence and mastery in core areas that secondary school graduates statewide must attain and will be effectively demonstrated through performance-based assessments.
- » Developing a "system of systems" model that will achieve vertical coherence between local and state systems by implementing a governance structure that supports state and local co-creation of an accountability system.
- » Creating and implementing a stakeholder engagement and input process whereby the relevant local community voices and helps determine the desired metrics of public information through which schools will be held accountable.
- » Creating data gathering systems and public interfacing information that reflect the local process of determining accountability measures so that administrators, educators, students and families have actionable metrics upon which to engage in systemic improvement. Such information should be in an accessible, easily digestible format in appropriate language(s) for educators, students, and families.





Measures Connected to Federal Assessment and Accountability Requirements Under ESSA That Do Not Require a Waiver

State ESSA Plans

- » Update the state's methodology for identifying schools for Targeted, Additional, and Comprehensive Support and Improvement to eliminate over-identification of schools. Eliminate the use of ESSAmandated statewide assessments in English language arts (ELA) and math as a basis for over-identifying schools for improvement beyond the requirements outlined in federal law (i.e., identify the minimum number of schools).
- » Update the state's methodology for exit criteria for Targeted, Additional, and Comprehensive Support and Improvement schools to eliminate any requirements beyond the federal minimum.

Statewide Assessment Systems

- » Limit statewide assessment to the minimum federal requirements (once per year in ELA/math for grades 3–8 and once in high school; once per grade span in science). Limiting standardized testing to those federal minimums would protect the time and energy of students and educators for the important work of learning and the demonstration of knowledge and skills through authentic performance-based assessments.
- » Decouple standardized exam requirements from granting high school diplomas. States should update graduation criteria, basing it on students' ability to complete required courses and demonstrate knowledge and skills through authentic assessments. States should determine multiple pathways to establish graduation readiness.
- » Eliminate use of standardized test results to rate educators, principals, and superintendents.
- » Do not make student promotion, retention, and/or course enrollment decisions based solely on standardized test results.





Accountability Systems

- » Reduce the weight of assessment-based indicators in accountability systems to the greatest extent allowable and increase the weight of school quality indicators that focus on equity, engagement, and opportunity.
- » Use multiple indicators of school quality, including a variety of inputs and outcomes, to evaluate school performance and serve as impetus for improvement. Inputs may include availability of high-quality curriculum, resources for special education, quality of teaching staff, access to social services, access to post-secondary opportunities, class size, number of science labs, or performing and visual arts instruction and opportunity. Outcomes may include responses to student and parent satisfaction surveys, student engagement, health and well-being, books read by students, number of students enrolled in high-level mathematics, course enrollment and completion, graduation rates, college and job placement, or economic and social well-being data of students years after leaving the system.
- » Capture student learning and progress in multiple ways and not solely or principally through performance on standardized tests. Develop a balanced system of student assessments with an emphasis on authentic assessment and assessments that foster deeper learning.

Federal Programs

Innovative Assessment Demonstration Authority

- » Build on the improvements and program clarifications outlined by the U.S. Department of Education (ED) in November 2023 and maximize the opportunities allowed under the Innovative Assessment Demonstration Authority (IADA) program. States may request flexibility to broaden the definition of comparability to allow assessment of deeper learning and more authentic performance-based approaches to assessment for students to demonstrate the full breadth and scope of their learning.
- » If necessary, request longer time horizons to bring pilot programs under IADA to full scale.

The IADA program was created under ESSA to give states temporary flexibility to experiment with new and innovative ways of assessing student learning. However, since its inception in 2015, the program has seen limited success. Only seven states have applied. Multiple states have dropped out, and only one—Massachusetts—has significantly expanded the administration of its pilot project. Massachusetts's focus has been the development and scaling of a performance-based science test where students use computer simulations to conduct activities like experiments.





One of the most significant hurdles to SEAs applying to the program is the "comparability" requirement. ED currently interprets this to mean that new assessments must produce results that can be directly compared to the traditional state tests. This limits innovation, forcing new assessments to mimic old ones in structure and scoring.

In November 2023, ED took a first step toward addressing regulations that dis-incentivize state applications to IADA by releasing new guidance, including alignment of IADA with the Competitive Grants for State Assessment (CGSA), application timeline improvements, and greater support for potential applicants.

Competitive Grants for State Assessment

- » Provide robust funding for CGSA and systematize pairing it with IADA so that states and LEAs can use CGSA funding to develop and ramp up assessments, which then can become part of the IADA applications, and eventually, fully scaled programs.
- » Seek CGSA grants for assessments that are truly new and innovative. Rather than subsidizing different versions of existing high-stakes standardized testing strategies, SEAs and LEAs should focus on evolving their systems to employ a diverse array of assessment strategies that will generate a more well-rounded understanding of student achievement.
- » Use CGSA monies to diversify assessment approaches and make them more culturally relevant, authentic to the discipline/content area being assessed, and incorporative of real-life, functional, and universal skills, such as critical thinking, problem-solving, and distilling and presenting information in persuasive ways and through multiple media.

Although there have been numerous CGSA applications and awards since 2015, none have resulted in a fully developed new or innovative state assessment system.





Request for Flexibility Under ESSA: Waivers

A state or local education agency should consider requesting a waiver for assessment and accountability flexibility based on a number of factors, including whether the SEA or LEA:

- » Has a plan for upholding the protections for civil rights that underpin Congress's intent behind the assessment and accountability requirements under Title I of ESSA;
- » Will use targeted flexibility to advance student-centered innovations that center equity and enhance opportunity for all students, especially under-served students, students with disabilities, and emergent multilingual learners;
- » Outlines, in the proposal, equity and balance enhancements in the assessment system, allowing educators to develop and use assessments that foster deeper learning and/or measure what matters, thus decentering test scores in accountability system proposals; and
- » Has a clear vision for partnership with the state and/or local union/association and its members—educators must have a seat at the table.

ESSA Waivers: The Basics

For a state or local education agency to receive a targeted waiver, the SEA must submit a request to ED. The state's request must meet each of the statutory requirements for a waiver outlined in <u>Section 8401(b)(1) of ESSA</u>, including the following:

- 1. The SEA must demonstrate how the request will advance student academic achievement, as required under ESSA (Section 8401(b)(1)(C)).
- 2. The SEA must demonstrate how the waiver would enable the school/district to maintain or improve transparency in reporting on student achievement and school performance to families and the public, as required under ESSA Section 8401(b)(1)(C) and (F).
- 3. The SEA must demonstrate how the school/district will continue to provide assistance to the same populations served by the Title I, Part A program, particularly in schools that otherwise would be identified for support and improvement and eligible to receive school improvement funds, as required under ESSA Section 1003 (Section 8401(b)(1)(F)).
- 4. The SEA must still report on SEA and LEA report cards all information that is not based on assessments—such as graduation rate, progress in achieving English language proficiency (ELP), and school quality/student success (SQSS) indicators for the schools unable to complete them.





Possible ESSA Waiver Requests

Accountability System Waivers

ESSA requires that academic achievement indicators count for "much greater weight" than school quality and student success indicators. What exactly that means has never been truly tested in the waiver process. ED has never actually mandated exact percentage weights for different accountability components. Most states ascribe 75 percent or more of their ESSA formulae to statewide testing results, whether through academic achievement or growth measures.

Given the current administration's uncertain posture, SEAs should consider testing approval for their preferred plans that incorporate more innovative, varied, and robust accountability measures through the amendment process prior to requesting a waiver on the point of significance of test-based measures. NEA and FairTest recommend that SEAs construct and submit ESSA plans that account for a greater percentage of other factors that are highly indicative of school quality.

SEAs may seek targeted waivers to support their own education priorities, such as movement toward multiple diploma pathways through CTE, capstones, and other innovative assessments, by increasing the weight and shifting the methodology of calculating College and Career Readiness (CCR) indicators. By replacing standardized tests with more comprehensive measures of CCR competencies, SEAs can request a waiver regarding academic performance and CCR calculations to capture systemic changes that are beneficial to secondary school students.

Assessment Waivers

States also can request waivers regarding the mechanisms through which they assess student academic progress. States may consider requesting assessment waivers to pilot innovative assessment approaches and avoid double-testing students. For example, some states are transitioning to through-year assessments to measure academic performance instead of standard end-of-year summative exams. Montana received a waiver to implement a through-year system; however, there is no actual evidence that through-year assessments provide educators with more usable, timely information or psychometrically are performing the same function as summative assessments in making judgments and comparisons of student progress on standardized tests. If states choose to introduce statewide through-year assessments without reducing locally administered commercial interim assessments and standardized tests, then, overall, time devoted to testing increases, taking time away from deeper, authentic classroom learning. Perhaps a more productive avenue for waiver activity would be for states to propose minimizing the standardized testing footprint.

⁵ Section (c) (4)(C)(ii)(I).





The "More Teaching, Less Testing Act of 2023"—which sought to decrease the frequency of standardized testing under ESSA, evaluate assessment practices, and promote quality teaching—provides a roadmap to the kind of waivers that states can request to minimize the intrusiveness of standardized testing while also maintaining its commitment to civil rights and identifying inequities and opportunity gaps.

A diverse array of assessment and education policy experts supported a number of the options proposed in this bill, including:

- 1. **Grade Span Testing:** Rather than testing every student in ELA and math every year and once in high school, states can test once in each area across a grade span: Elementary (grades 3–5); Middle (grades 6–9); and Secondary (grades 10–12). If states seek a waiver to institute grade-span testing across elementary and middle school years in the same way it exists for secondary school, they can create time and space to develop and implement more authentic and useful assessments, providing more actionable information to educators and students while still maintaining the check of disaggregated testing data by subgroup and overall testing data to judge one type of academic performance over time.
- **2. Matrix Sampling:** To reduce the testing footprint, states can seek permission to employ matrix sampling. The term "matrix sampling" means an educational assessment administration method in which a state:
 - » Divides the total number of questions on an educational assessment into groups that are comprised of an equal number of questions; and
 - » Divides into groups the students enrolled at an elementary or secondary school who will receive such educational assessment.
 - By employing matrix sampling, not every student will answer the entire battery of questions to obtain systemic and group information about schools and districts; however, such information will be produced. The individual school and/or district evaluates individual student learning through a robust balanced assessment system.
- **3. Representative Sampling:** Representative sampling can reduce the testing footprint and maintain accurate information about school quality. Representative sampling is an educational assessment administration method in which a state:
 - » Administers math, reading or ELA, and science assessments to a representative sample of students from a sample of public elementary and secondary schools in the state; and
 - » Is able to draw from such sampling valid and reliable inferences about the performance of students in:
 - » The state and local education agencies served by the state; and
 - » The elementary and secondary schools selected for such sampling.





Whatever approach SEAs propose to reduce the overall testing footprint for students, they must ensure that the results of statewide assessments under ESSA allow for the disaggregation of results by subgroup (in accordance with Sec. 1111). This practice is paramount for protecting students' civil rights and ensuring that there is a transparent method for identifying and addressing education disparities faced by marginalized communities and promoting improved education outcomes for all students.

NEA and FairTest support waiver requests that are designed to mitigate the unintended consequences of annual standardized testing, such as dominating classroom time and focus, while maintaining the useful information regarding disparities and improvement needs that targeted testing data can provide.





RESOURCES

National Education Association. Principles for the Future of Assessment (2021; last updated 2022). Available at https://www.nea.org/resource-library/principles-future-assessment.

National Center for Fair & Open Testing. Model Legislation (last updated 2025). Available at https://fairtest.org/model-legislation/#:~:text=FairTest%20has%20partnered%20with%20the,beneficial%2C%20valid%20and%20reliable%20assessments.

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