



January 21, 2016

The Honorable John King
Acting Secretary
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Request for Information: Implementing Programs under Title I of the Elementary and Secondary Education Act

Dear Acting Secretary King:

The State Educational Technology Directors Association (SETDA) and the Consortium for School Networking (CoSN) appreciate this opportunity to submit comments responding to the U.S. Department of Education's Request for Information regarding implementation of Title I of the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act (ESSA). ESSA recognizes that achieving the nation's ambitious educational goals will require State and local leadership and innovation, including strategies for more effectively using technology to support teaching and learning. Our members' ongoing work helping States, districts, and schools navigate the digital transition, includes innovative projects aligned to key ESSA provisions, such as the law's focus on supporting and encouraging student-centered, project-based learning, developing next generation assessments, integrating supports, and better using technology and open educational resources to support and enhance instruction. With this work as our guide, we respectfully encourage you to consider the following recommendations.

Support State Efforts to Ensure that Districts have the Technology Infrastructure required to Implement Next Generation Assessments. SETDA and CoSN urge the Department to encourage and support Title I State Assessment grant investments in the technology required to administer sophisticated assessments. Identifying and filling assessment infrastructure gaps is critical to promoting digital equity. Absent such a focus, many students - especially the nation's lowest income students - will lack access to the modern hardware and software needed to support improved instruction and validate their knowledge and skills. Among other uses, assessment technology supports the presentation of tasks and items, technology-enhanced response capture, scoring, reporting, and for some assessment models, adaptive capabilities. In addition, we strongly encourage you to work with State and local leaders to ensure the Department addresses technology adequately when implementing ESSA Title I's Innovative

Assessment and Accountability Authority, which calls on states to develop plans for ensuring districts have sufficient assessment technology infrastructure.

Ensure ESSA’s Optional Assessment Audit Program includes Sound Guidance and Sufficient Funding to Support Meaningful Assessment Technology and Staff Capacity Reviews. SETDA and CoSN commend Congress for recognizing that the optional assessment audits authorized by Title I should include seeking stakeholder feedback about the distribution of technological resources and personnel necessary to administer assessments. The program also focuses on the extent to which assessment data is presented in an accessible and understandable format for all users. Fully exploring these important questions, and other related issues, will require well-designed and executed audits. We urge the Department to ensure that the statute’s focus on technology and related staff capacity is well reflected in the program’s implementation, including urging participating States to share audit results with their districts and ensure that the district level sub grants authorized by the statute include a strong focus on using technology to improve assessment quality.

Align Implementation of Title I with ESSA’s other Technology Provisions. SETDA and CoSN strongly support Congress’s decision to include clear provisions in Title II permitting States and districts to provide training to teachers, principals, and other school leaders focused on effectively integrating technology into curricula and instruction, appropriately using student data, and protecting student privacy. Our members also welcome the new Student Support and Academic Enrichment Grants established by ESSA Title IV, which include a core focus technology acquisition, the digital transition, and related professional development. We look forward to commenting on the Department’s implementation of Title II and Title IV at the appropriate time. Until then, we urge you to ensure that guidance and regulations related to Title I’s technology provisions are aligned strategically with the law’s other technology programs and initiatives. For example, the Department of Education’s implementation of the assessment technology provisions described above should include guidance for States and districts about how to blend and braid Title I, Title II, Title IV, and other sources of technology funding to accomplish ESSA’s goals. Greater clarity at the federal level about how to effectively pool ESSA technology resources – when permitted – would help States and districts implement the new law.

Thank you again for providing this opportunity to provide initial input into the Department’s implementation of Title I. SETDA, CoSN, and our members, look forward to working with the Department to ensure the new law’s technology provisions contribute to effort focused on helping all students prepare for postsecondary success.

Sincerely,

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