

February 13, 2026

Dear Superintendent Critchfield,

We, the undersigned education advocacy organizations, appreciate the opportunity to provide public comment on Idaho State Department of Education's (ISDE) federal flexibility recommendations. We are providing public comment because we are very concerned that ISDE's plans to waive certain federal requirements around assessments are not in the best interest of Idaho students and parents who deserve to know if their children are on grade-level and being given the opportunity to succeed compared to other students in the states, particularly in light of state constitutional education requirements. Additionally, the proposed waivers are inconsistent with requirements in Section 8401 of the Elementary and Secondary Education Act (ESEA) that waivers "advance student achievement" and – as required specifically for assessment waivers "maintain or improve transparency" on student achievement. Below we outline our key concerns around each proposed waiver.

However, we are sympathetic to concerns about the amount of testing required of students and educators and the desire to align assessment options with student pathways. Therefore, we also propose alternatives to waivers that would reduce testing burdens and provide student choice while also maintaining annual statewide assessments that enable comparable data needed to understand how Idaho public schools are meeting the needs of all students and provide transparency for families and the public.

### *3rd Grade ELA Assessment*

ISDE's recommendation to replace the third grade ISAT assessment with the Idaho Reading Inventory (IRI) is concerning for several reasons. First, statewide summative tests are required to be aligned to state academic standards. The constructs measured on IRI, per the [technical guide](#), appear to only align with a portion of the [English Language Art Idaho Content Standards](#), with a particular gap in writing skills. As a result, if IRI were to replace ISAT as proposed, stakeholders across the state would no longer have a clear understanding of whether 3rd graders have mastered the full scope of learning expectations—making it more difficult to support students' academic needs, while failing to meet federal assessment waiver requirements. In fact, if IRI were an adequate measure of third grade content standards, ISDE would not need to apply for a waiver at all, but could simply change assessments and go through the normal federal peer review process. By indicating the intention to apply for a waiver, ISDE implicitly acknowledges IRI is not aligned with federal assessment requirements.

Second, using a different assessment in third grade than other grades would eliminate the ability to validly calculate student growth between third and fourth grade. Measuring growth is essential for providing families and policymakers with data about how students are progressing in their learning over time and provides a fairer measure of school quality by giving school credit for the progress students make from year to year, particularly when schools have large numbers of students that are starting the year far below grade level. This proposed waiver would limit K-5

elementary schools to just a single year of growth data, further limiting public transparency and the opportunity for schools to get credit for the growth in student achievement they support between third and fourth grades.

Finally, IRI is intended to “identify students who need additional reading support, guide instruction, and monitor student progress.” The proposed waiver would expand the use of IRI beyond its intended use as a screener, thereby adding accountability and school rating pressures to an assessment designed solely for identification and instructional purposes. Screeners are an essential starting point for identifying which students are behind by surfacing student needs, and triggering access to additional supports. Clear, trustworthy screener data helps system leaders, administrators, coaches, educators, and families understand which students need what supports—and allocate staffing, intervention, and resources accordingly. However, attaching accountability considerations to a tool intended for early identification disincentivizes districts and schools to honestly identify the students who need intervention and those who may be at risk for reading difficulties. This ultimately limits students’ meaningful access to the supports the screener was meant to trigger.

In lieu of this waiver, ISDE could work with the state legislature to limit the burden on third grade students by eliminating the requirement that all third grade students take IRI in the spring, limiting it just to students identified as at risk during the fall administration. Alternatively, the second administration of IRI in 3rd grade could be shifted to winter, rather than spring. ISDE could also support districts to conduct audits of district-required assessments to identify other assessments that could be eliminated, to further reduce the testing burden of younger students without eliminating essential summative data.

### *Student Selected High School Assessments*

While we understand the goal of reducing testing burden by aligning assessments with student college and career pathways, ISBE’s proposal to replace the 11th grade ISAT with a menu of different assessment options for students fundamentally undermines the purpose of statewide summative assessments. Federal law requires all students annually take the same assessment across the state because it is this consistency that produces achievement data that can be validly compared across classrooms, schools and districts. This comparable data also allows for the disaggregation of results by student groups necessary to identify and work to close opportunity gaps. Without this, educators, administrators, and policymakers cannot make data-driven decisions about how to best support the needs of all students by targeting limited supports and resources where they are most needed, essential for meeting [state constitutional requirements](#) to provide a “general, uniform and thorough” system of public schools.

The proposed menu of assessments would also effectively hold some students to dramatically lower academic standards than others. For instance, the skills needed to achieve the [highest level of achievement](#) on the Applied Math Workkeys assessment are predominantly aligned with Idaho’s sixth and seventh grade [math standards](#), such as calculating unit costs and solving problems with ratios or fractions—far below expectations for high school students. By holding

some students to lower standards, Idaho's accountability would be fundamentally less transparent for families and communities about how schools are supporting all students to meet the same rigorous academic standards, as required for such a waiver to be approved. Further, this proposal risks reinforcing long-standing tracking practices that disproportionately affect students of color and students with disabilities – allowing schools and districts to easily hide achievement gaps by tracking certain students into certain assessments.

This administration has made clear that, even while inviting proposals to waive federal requirements under the Every Student Succeeds Act (ESSA), staff at the US Department of Education (ED) ensure a high-level of scrutiny for waiver requests related to assessments. Last year, when Oklahoma released their assessment waiver proposal, ED [publicly stated](#) their hesitations with waiver, noting that “assessment and accountability is critical” for supporting the administration's agenda.

When Arizona applied for a waiver to allow a similar menu of high school assessments, officials in the first Trump Administration rejected their proposal. In their [rejection letter](#), ED cited a lack of evidence that the included assessments were aligned to state academic standards, but also highlighted our key concerns around comparability, “The Department has not previously waived this requirement, since using a single assessment across an LEA is necessary for parents and the public to review comparable results. ...The requirements that all students are held to the same, high challenging academic standards and are assessed on the same statewide assessment form the basis for much of a State's accountability system and provide essential and comparable information to parents and the Public.” Despite having the authority to waive these provisions, this administration has made clear that it has little intention of doing so.

Yet, ISDE has additional options at its disposal to address the goal of reducing students' testing burden while providing assessment aligned to multiple postsecondary pathways. In lieu of a waiver, the state could shift the statewide academic assessment for all students to 10th grade, aligning their assessment timeline with other states, including [Washington](#), which also uses Smarter Balanced.

ISBE could then provide 11th and 12th grade students with a menu of *optional* assessments that are aligned with plans after graduation, in place of a summative assessment. This would alleviate the testing burden on older students, while still producing comparable student achievement data necessary for accountability and public transparency. And to ensure schools get credit for supporting student readiness in their chosen pathway, Idaho could expand its college and career readiness indicators in its accountability system to encompass the results from the menu of assessments, following the lead of [other states](#).

Thank you again for the opportunity to provide comment on ISBE's proposed ESSA waivers. We would welcome further discussion on our concerns and proposed alternatives to meet ISBE's state goals while maintaining alignment to federal assessment requirements designed to ensure accountability and transparency about how schools are supporting the needs of all students.

Sincerely,

All4Ed

Council of Parent Attorneys and Advocates (COPAA)

EdTrust

Families in Schools (FIS)

National Center for Learning Disabilities

National Parents Union

UnidosUS