



July 5, 2012

Commissioner Mitchell Chester  
Chair, PARCC Governing Board  
c/o Achieve  
1400 16<sup>th</sup> Street NW, Suite 510  
Washington DC, 20036

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Dear Commissioner Chester and Members of the PARCC Steering Committee:

Thank you for your letter of July 2, 2012, which pointed out the PARCC Governing Board's concerns about certain activities of companies that serve as contractors or subcontractors to PARCC. I welcome the chance for us to clarify expectations and goals associated with the important work PARCC is doing for U.S. education, as well as ways in which we can help PARCC achieve your admirable and ambitious goals.

ETS has been, and will continue to be, a strong supporter of the Common Core State Standards project, and the work of both PARCC and the Smarter Balanced Assessment Consortium to develop next-generation comprehensive assessment systems. We have issued numerous white papers, commentaries, and public testimony showing that support. We have had a website ([www.commonassessments.org](http://www.commonassessments.org)) for almost two years, showing our support and encouragement for your efforts.

Our Center for K-12 Assessment and Performance Management at ETS, headed by Pat Forgione, has been widely acknowledged as an effective catalyst in promoting the work of both consortia. The Center has facilitated discussion among key stakeholders and the country's thought leaders to promote the development of a new generation of assessment and performance management methodologies, technologies, policies and practices. The Center's publication, "Coming Together to Raise Achievement: New Assessment for the Common Core State Standards," ([http://www.k12center.org/rsc/pdf/Coming\\_Together\\_April\\_2012\\_Final.PDF](http://www.k12center.org/rsc/pdf/Coming_Together_April_2012_Final.PDF)) has been praised by many consortium leaders and members as an important contribution to your efforts and those of the other consortia. The Center's conferences have helped to bring together the experts to help inform your work. Finally, our winning proposal to PARCC to develop items for your assessment system shows our deep commitment, and those of our subcontractors, to your important mission.

While our support of PARCC is unequivocal, we do think it is important that PARCC understands that ETS has ongoing -- and expects to have new -- commitments to a large number of clients and colleagues in fulfillment of our nonprofit mission. We do not see these commitments as being in conflict with PARCC's work, and we fully expect to continue our overall work with your support and encouragement, just as we support and encourage your work.

Here are specific answers to the four questions you pose in your letter:



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**Is your firm developing or supporting any assessment products that purport to be alternatives to the PARCC assessment under development?**

ETS is not developing any assessment products that purport to be alternatives to the PARCC assessment under development.

ETS is supporting Smarter Balanced in the development of its assessment system, which competes with PARCC for state adoption. We made our work with Smarter Balanced known to PARCC in our proposal to PARCC, which you accepted. We intend to continue to work with Smarter Balanced as they develop their comprehensive system. As we pointed out in the answers to questions posed by your selection committee, we are committed to protecting the confidentiality of PARCC information in our work with Smarter Balanced, and vice versa.

ETS supports individual states in custom assessment programs, many of which will likely co-exist with PARCC or supplement PARCC with assessments in other subjects and grades. An example of this work is our contract with the Maryland State Department of education to develop and administer their high school testing program. We perform similar duties for the states of Washington, California, and Wyoming. We also do work for states under subcontract to Pearson, including development of tests for Texas and Virginia, which are not members of either of the assessment consortia. We do not view this work in any way as distracting from PARCC's mission, or damaging to PARCC's sustainability.

Finally, ETS continues to do its long-term research and development on our *Cognitively Based Assessment of, for and as Learning* (CBAL), (<http://www.ets.org/research/topics/cbal/initiative>) which has components that might overlap with some of PARCC's diagnostic assessment programs. We do not intend to position any CBAL products as alternatives to PARCC assessments, but rather as complementary and supportive of PARCC assessments.

**• If so, what steps will you take, and what commitments will you make, to assure that your firm will put forth the strongest possible efforts to help PARCC create high quality assessments at the lowest possible cost?**

As stated above, ETS is not developing products that purport to be alternatives to PARCC assessments. In our proposal to PARCC, now embodied in our contract, we have made strong and binding commitments to help PARCC create high quality assessments. Our proposal provided reasonable costs for our work, which were further negotiated and reduced during the Best and Final Offer process with your selection committee and fiscal agent. Our reputation and brand are fully behind our commitment to PARCC, and will remain so.

**• How can we be confident that your firm will devote its top personnel talent to exclusively developing PARCC assessments, even if doing so could adversely impact your other business interests?**



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In our proposal to PARCC, we named specific individuals to provide our work for PARCC, and those personnel have been thoroughly reviewed and vetted through your selection process. In response to questions from the selection committee, we made it clear that any staff we proposed for PARCC would have the capacity and support to deliver the work. We do not see any aspect of our work on PARCC as adversely impacting our other business interests.

As evidence of our commitment to PARCC, I would like to point out that we hired highly qualified staff totally dedicated to PARCC considerably in advance of your issuing procurements. Kit Viator, who is an acknowledged leader in the field, came to us more than a year ago specifically to help us ensure that our PARCC work was delivered with the highest possible quality. In our proposal, we named some of our best and brightest staff in assessment development, psychometrics and related areas to do this critically important work.

It is important to point out that ETS does have other very important work to do for clients other than PARCC. This work is not competitive to PARCC, and we are committed to those clients as well. Our pledge to PARCC is that we will deliver the high quality we proposed with the highly qualified staff we proposed, and you accepted in the selection and negotiation process.

**• How can we be confident that the public funds you obtain and intellectual property that you produce through your contract with PARCC will not be used to develop assessments that are intended to advance the interests of your firm rather than those of PARCC?**

Since I have already pointed out that we do not have any plans to develop a competing product, you can rest assured that funds we receive for our work on PARCC will not be used to advance any interests other than those of PARCC. We have indicated in our bid documents and BAFO that ETS is making no profit on the PARCC contract. Your contract with us already provides the customary protections of your intellectual property, and we fully intend to honor those commitments.

I hope this letter makes our position clear. ETS is your ally and collaborator in the valuable work you have undertaken for U.S. education. We are proud to be associated with you and honored you have chosen us for this project. If you have any further questions about our commitment to PARCC, please let me know.

I look forward to our mutual success in serving the children of America.

Sincerely,

A handwritten signature in black ink, appearing to read "Kurt M. Landgraf".

Kurt M. Landgraf  
President and CEO  
ETS