

# K-12 Education: Better Planning Could Help DOD Schools Implement Changes to Standardized Testing (Accessible Version)

GAO-24-106322

A Report to Congressional Committees

October 16, 2023

## Why This Matters

The Department of Defense Education Activity (DODEA) operates DOD's school system, which primarily serves children of active duty military service members and DOD civilian employees and contractors. These schools serve about 66,000 highly mobile students in pre-kindergarten through 12th grade in approximately 160 schools. Located in nine U.S. states and territories and 11 foreign countries, DODEA schools are organized into three regions: Americas, Europe, and Pacific. These regions are further divided into eight total districts.<sup>1</sup>

As in traditional public schools, DODEA uses standardized tests—tests administered and scored in a preset, standard manner—to assess academic progress of students over time. This is particularly important for DODEA students, who frequently move between and in and out of DODEA schools. DODEA launched its Comprehensive Assessment System in 2018 to better align its standardized tests to its curriculum standards and to ease transitions for students.<sup>2</sup> Standardized tests required under the Comprehensive Assessment System are administered DODEA-wide, regardless of school location. Individual DODEA regions, districts, schools, and teachers may choose to administer additional standardized tests.

In 2021, DODEA convened a working group, made up of agency leadership, school principals, teachers, and other instructional staff to review and recommend changes to the testing policies and procedures under the Comprehensive Assessment System.

Senate Report No. 117-130 accompanying the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 includes a provision for GAO to review standardized testing in DODEA schools. Our review examined standardized test requirements and the amount of time DODEA students spend on standardized tests, and how this compares to selected public schools.

## Key Takeaways

- The time DODEA students spent taking required standardized tests varied across districts, from about 15 to 38 school days, across grades K–12.
- On average, DODEA students spent more time on these tests (about 24 school days) compared to students in nine selected public school districts. The public school districts were located near large military installations and in some cases, near DODEA schools. Students in these public schools averaged about 16 school days across grades K–12.

- The working group identified six recommendations that could potentially address unneeded tests and unnecessary testing time. Agency officials told us that implementing all six recommendations would result in less variation across districts in time students spend on standardized tests, and reduce total testing time in districts where students currently spend the most time on tests.
- We recommend that DODEA incorporate leading project management practices, such as information about how progress will be tracked and reviewed, into its implementation plan for its working group recommendations on changes to testing policies and procedures.

### How do DODEA-wide standardized test requirements compare to federally required state tests?

DODEA’s standardized test requirements differ from other federal requirements—which do not apply to DODEA schools—in terms of the subjects covered and frequency of tests.<sup>3</sup>

Under federal law, states must ensure that all public schools receiving funding under Title I of the Elementary and Secondary Education Act of 1965, as amended, administer certain academic assessments, such as periodic math and literacy tests.<sup>4</sup> While DODEA is not required by law to administer such assessments, it chooses to require some DODEA-wide assessments through its Comprehensive Assessment System (see fig. 1).<sup>5</sup> There are differences between the two systems. For example, DODEA requires mid-year tests in math and literacy in certain grades, which are not required under Title I. Conversely, Title I requires a science test, which DODEA does not.

**Figure 1: Federally Required State Assessments Compared to DODEA’s Comprehensive Assessment System**

Federally required state tests:	None												
	Lower elementary			Upper elementary			Middle school			High school			
School level:	Lower elementary			Upper elementary			Middle school			High school			
Grades:	K	1	2	3	4	5	6	7	8	9	10	11	12
<b>Tests in DODEA’s Comprehensive Assessment System:</b>	<ul style="list-style-type: none"> <li>■ Reading proficiency: Each grade</li> <li>■ Cognitive abilities: Given to 2nd graders</li> </ul>			<ul style="list-style-type: none"> <li>■ Reading proficiency: Test in each grade</li> <li>■ Literacy: Two mid-year tests and one end of year test each year</li> <li>■ Math: Three mid-year tests and one end of year test each year</li> </ul>			<ul style="list-style-type: none"> <li>■ Literacy: Two mid-year tests and one end of year test each year</li> <li>■ Math: End of year test each year</li> <li>■ PSAT: Given to 8th graders</li> <li>■ World language: First of two tests (For students taking a world language)</li> </ul>			<ul style="list-style-type: none"> <li>■ Literacy: Two mid-year tests and one end of year test given to tenth graders</li> <li>■ Math: End-of-year test each year</li> <li>■ PSAT: 9th, 10th, and 11th graders tested each year</li> <li>■ World language: Second of two tests (For students taking a world language)</li> </ul>			

K= Kindergarten  
PSAT= Preliminary Scholastic Aptitude Test

Source: Federal requirements for states receiving assistance under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. § 6311(b)(2)(B)(v), and Department of Defense Education Activity (DODEA) testing requirements under the Comprehensive Assessment System for school year 2022-23. | GAO-24-106322

### Accessible Data for Figure 1: Federally Required State Assessments Compared to DODEA’s Comprehensive Assessment System

School level	Grades	Federally required state tests	Tests in DODEA’s Comprehensive Assessment System
Lower elementary	Kindergarten to 2	<ul style="list-style-type: none"> <li>• None</li> </ul>	<ul style="list-style-type: none"> <li>• Reading proficiency: Each grade</li> <li>• Cognitive abilities: Given to 2nd graders</li> </ul>
Upper elementary	3 to 5	<ul style="list-style-type: none"> <li>• Literacy: Each year</li> <li>• Math: Each year</li> <li>• Science: At least once</li> </ul>	<ul style="list-style-type: none"> <li>• Reading proficiency: Test in each grade</li> <li>• Literacy: Two mid-year tests and one end of year test each year</li> <li>• Math: Three mid-year tests and one end of year test each year</li> </ul>

School level	Grades	Federally required state tests	Tests in DODEA's Comprehensive Assessment System
Middle school	6 to 8	<ul style="list-style-type: none"> <li>Literacy: Each year</li> <li>Math: Each year</li> <li>Science: At least once</li> </ul>	<ul style="list-style-type: none"> <li>Literacy: Two mid-year tests and one end of year test each year</li> <li>Math: End of year test each year</li> <li>Preliminary Scholastic Aptitude Test (PSAT): Given to 8th graders</li> <li>World language: First of two tests (For students taking a world language)</li> </ul>
High school	9 to 12	<ul style="list-style-type: none"> <li>Literacy: Each year</li> <li>Math: Each year</li> <li>Science: At least once</li> </ul>	<ul style="list-style-type: none"> <li>Literacy: Two mid-year tests and one end of year test given to tenth graders</li> <li>Math: End-of-year test each year</li> <li>PSAT: 9th, 10th, and 11th graders tested each year</li> <li>World language: Second of two tests (For students taking a world language)</li> </ul>

Source: Federal requirements for states receiving assistance under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. § 6311(b)(2)(B)(v)), and Department of Defense Education Activity (DODEA) testing requirements under the Comprehensive Assessment System for school year 2022-23. | GAO-24-106322

Note: Federal requirements for standardized tests—which do not apply to DODEA schools—refer to “reading or language arts,” which we refer to as “literacy” for consistency with DODEA’s terminology. Federal requirements mandate that English language proficiency tests are given annually to English learners. DODEA administers English language proficiency tests as well.

According to DODEA officials, a main difference between their system-wide testing practices and federally required state testing in public schools is that in DODEA, test results are not used to rank schools; rather, they are mainly used to improve instruction based on students’ demonstrated mastery of skills and content. In contrast, Title I requires states to consider student scores on statewide academic assessments when they determine school performance. Additionally, according to DODEA officials, none of DODEA’s standardized tests are required for graduation or to move to the next grade level, and test results are not used to rate teachers. States however, may require specific assessments for graduation and incorporate student performance on assessments in teacher evaluations.

### What standardized tests do DODEA districts and selected public school districts require?

We found that almost every DODEA and public school district in our sample had additional testing requirements beyond what is required DODEA-wide and by federal requirements for most school districts. We obtained the information for our analysis from DODEA and a sample of nine traditional public school districts via a questionnaire. The public school districts were located near large military installations and in some cases, near DODEA schools.

#### DODEA district test requirements

Seven of eight DODEA districts choose to administer standardized tests not required under the Comprehensive Assessment System, mostly in elementary school.<sup>6</sup> For example, a district in the Europe region reported that it requires all students to take a math test six times per year in elementary school, as well as a writing test four times a year in kindergarten and in first grade. Four of the eight districts also required additional testing in middle and high school.

#### Selected public school district test requirements

All nine public school districts that responded to our questionnaire had additional standardized test requirements beyond federally-required state tests. For example, all nine districts required reading assessments in elementary school, and four required cognitive screening to identify academically advanced students in second grade. Additionally, six of the nine districts required college entrance exams such as the PSAT, SAT, or ACT.

Districts within a state can vary in how they administer state standardized test requirements. For example, officials in Virginia told us that they require tests in history, science, and writing in several grades, but the tests can be locally designed and vary in content and length.

States can also vary in whether and which tests they require beyond federal requirements. For example, officials in Kentucky told us they require annual writing and social studies tests in high school that are not federally required.

### **Why is there variation in standardized tests administered among DODEA districts?**

Standardized test requirements differ among DODEA districts mainly because of (1) tests required as part of district improvement plans and (2) district decisions to use optional tests packaged with the DODEA curriculum.

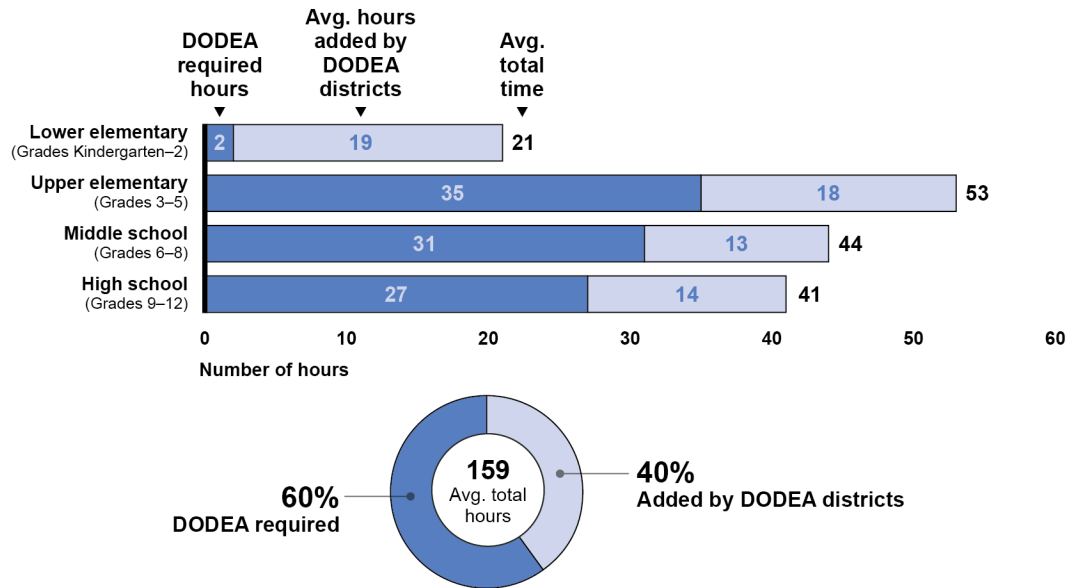
DODEA districts are required to have district improvement plans as part of their accreditation process, which often include additional standardized tests to track their progress toward meeting the plans' goals. For example, officials in a district in the Pacific region told us their improvement plan includes elementary math skills and instruction. The district therefore requires an end-of-year math test in grades K–2 (the DODEA-wide math test requirements start in third grade), as well as a math skills test at the beginning of every year in elementary school.

The curriculum package used DODEA-wide includes optional tests designed to help teachers understand how well students are learning the material. Some districts require a certain number of these tests be administered each year, and other districts leave this to the discretion of schools or teachers. For example, a district in the Americas region requires that all teachers administer eight math “learning check” tests every year in elementary school, while a district in the Pacific region leaves the decision up to its schools. For districts taking the latter approach, there also may be variation among schools within a district.

### **How much time do DODEA students spend on required standardized tests?**

DODEA students spent, on average, 159 hours (about 24 school days) across grades K–12 on standardized tests required by the Comprehensive Assessment System or their district, according to our analysis of school year 2022–23 testing requirements.<sup>7</sup> About 60 percent of this time is for DODEA-wide tests and 40 percent is at the districts' discretion (see fig. 2).

**Figure 2: Time Spent on Required Standardized Tests in DODEA Schools, per Student, School Year 2022–23**



Source: Department of Defense Education Activities (DODEA) headquarters and district responses to GAO questionnaire. | GAO-24-106322

**Accessible Data for Figure 2: Time Spent on Required Standardized Tests in DODEA Schools, per Student, School Year 2022–23**

Category	DODEA required hours	Average hours added by DODEA districts	Average total hours
Lower elementary (Grades Kindergarten–2)	2	19	21
Upper elementary (Grades 3–5)	35	18	53
Middle school (Grades 6–8)	31	13	44
High school (Grades 9–12)	27	14	41

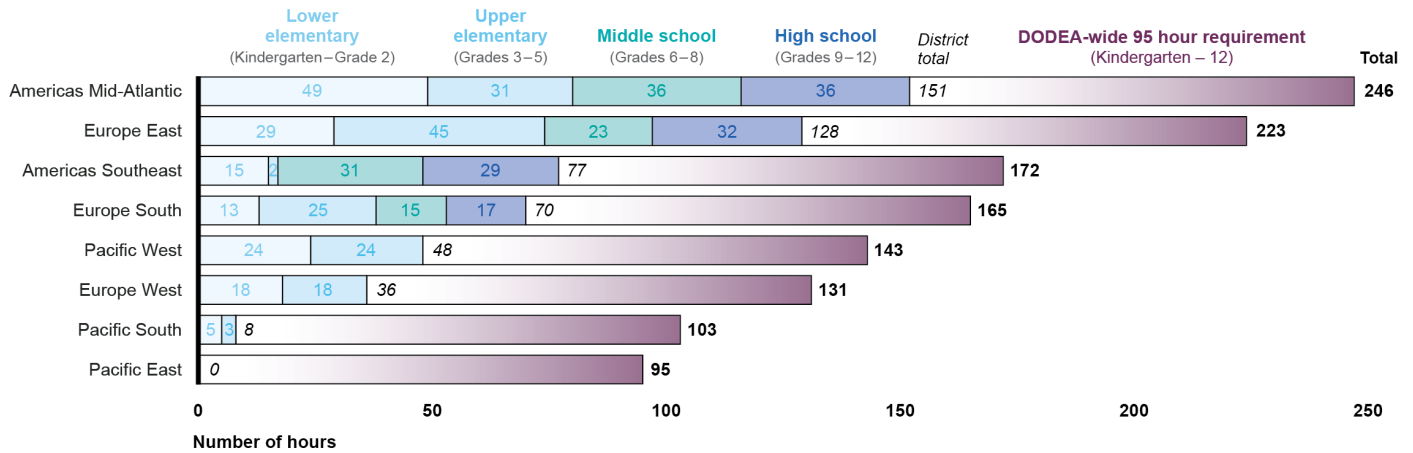
**Average total hours: 159 (60% DODEA required; 40% added by DODEA districts)**

Source: Department of Defense Education Activities (DODEA) headquarters and district responses to GAO questionnaire. | GAO-24-106322

Note: We defined time spent on tests as the maximum amount of time, in minutes, that a student without accommodations is allowed to complete the test. For untimed tests, we asked for the typical amount of time a student without accommodations spends on the test.

Across districts and grade levels, however, time spent on required standardized tests varies widely. District requirements range from 95 hours in the Pacific East region to 246 hours in the America’s Mid-Atlantic region across grades K–12, or about 15 to 38 school days (see fig. 3).

**Figure 3: Total Time Spent on Required Standardized Tests by Each DODEA District, per Student, School Year 2022–23**



Source: Department of Defense Education Activities (DODEA) headquarters and district responses to GAO questionnaire. | GAO-24-106322

**Accessible Data for Figure 3: Total Time Spent on Required Standardized Tests by Each DODEA District, per Student, School Year 2022–23**

Category	Lower elementary (Grades Kindergarten–2)	Upper elementary (Grades 3–5)	Middle school (Grades 6–8)	High school (Grades 9–12)	District total	Total with DODEA-wide 95 hour requirement (All grades)
Americas Mid-Atlantic	49	31	36	36	152	247
Europe East	29	45	23	32	129	224
Americas Southeast	15	2	31	29	77	172
Europe South	13	25	15	17	70	165
Pacific West	24	24	0	0	48	143
Europe West	18	18	0	0	36	131
Pacific South	5	3	0	0	8	103
Pacific East	0	0	0	0	0	95

Source: Department of Defense Education Activities (DODEA) headquarters and district responses to GAO questionnaire. | GAO-24-106322

Note: Numbers may not sum due to rounding. We defined time spent on tests as the maximum amount of time, in minutes, that a student without accommodations is allowed to complete the test. For untimed tests, we asked for the typical amount of time a student without accommodations spends on the test.

There may be additional variation among and within districts because schools and teachers may choose to administer additional standardized tests, according to DODEA regional and district staff and teachers’ unions’ representatives. Representatives from teachers’ unions said that school-level testing requirements and the amount of teacher autonomy in determining which tests to administer can change from year to year, particularly if school leadership changes.

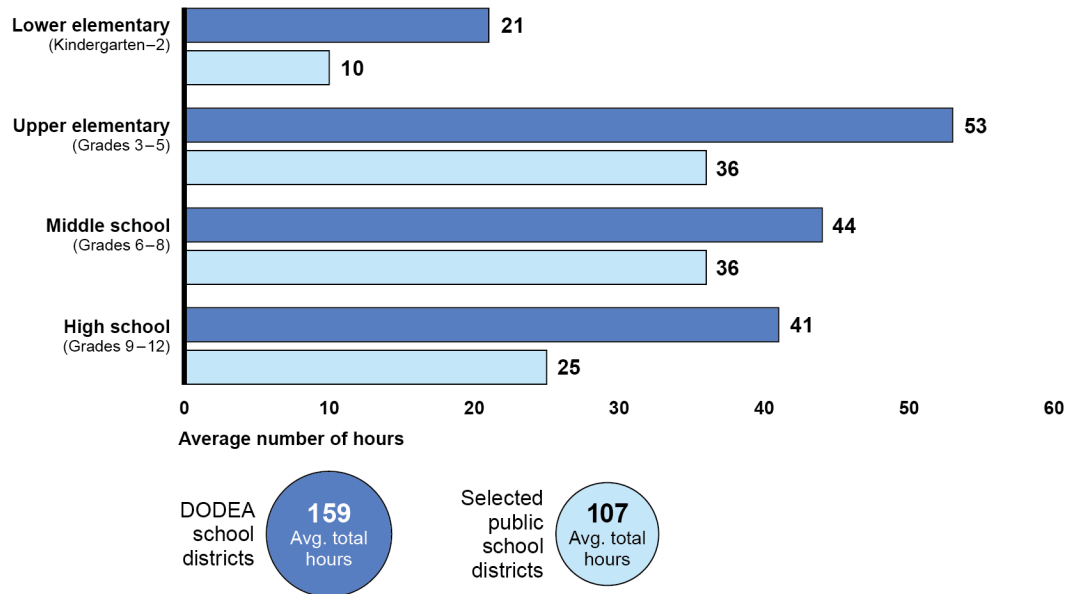
Additionally, the amount of time students sit for standardized tests does not capture classroom time dedicated to standardized tests, according to representatives from the teachers’ unions. For example, DODEA’s required reading proficiency test for all elementary school students takes less than fifteen minutes per student. However, it is much more time-consuming for teachers

because they administer the test individually to students. Representatives from the teachers' unions told us that it can be difficult to manage the rest of the classroom while administering this test.

### How does time spent on standardized testing in DODEA districts compare to selected public school districts?

On average, in every grade band, DODEA students spent more time on testing in school year 2022–23 than students in the nine public school districts in our sample. Specifically, time spent taking tests in DODEA districts was 159 hours (about 24 school days), on average, across grades K-12, compared to 107 hours (about 16 school days) in the nine public school districts (see fig. 4).

**Figure 4: Average Time Spent on Required Standardized Tests per Student in DODEA School Districts and Nine Selected Public School Districts, School Year 2022–23**



Source: Department of Defense Education Activities (DODEA) headquarters and district responses to GAO questionnaire. | GAO-24-106322

**Accessible Data for Figure 4: Average Time Spent on Required Standardized Tests per Student in DODEA School Districts and Nine Selected Public School Districts, School Year 2022–23**

Category	DODEA school districts	Selected public school districts
Lower elementary (Grades Kindergarten–2)	21	10
Upper elementary (Grades 3–5)	53	36
Middle school (Grades 6–8)	44	36
High school (Grades 9–12)	41	25
<b>Average total hours</b>	<b>159</b>	<b>107</b>

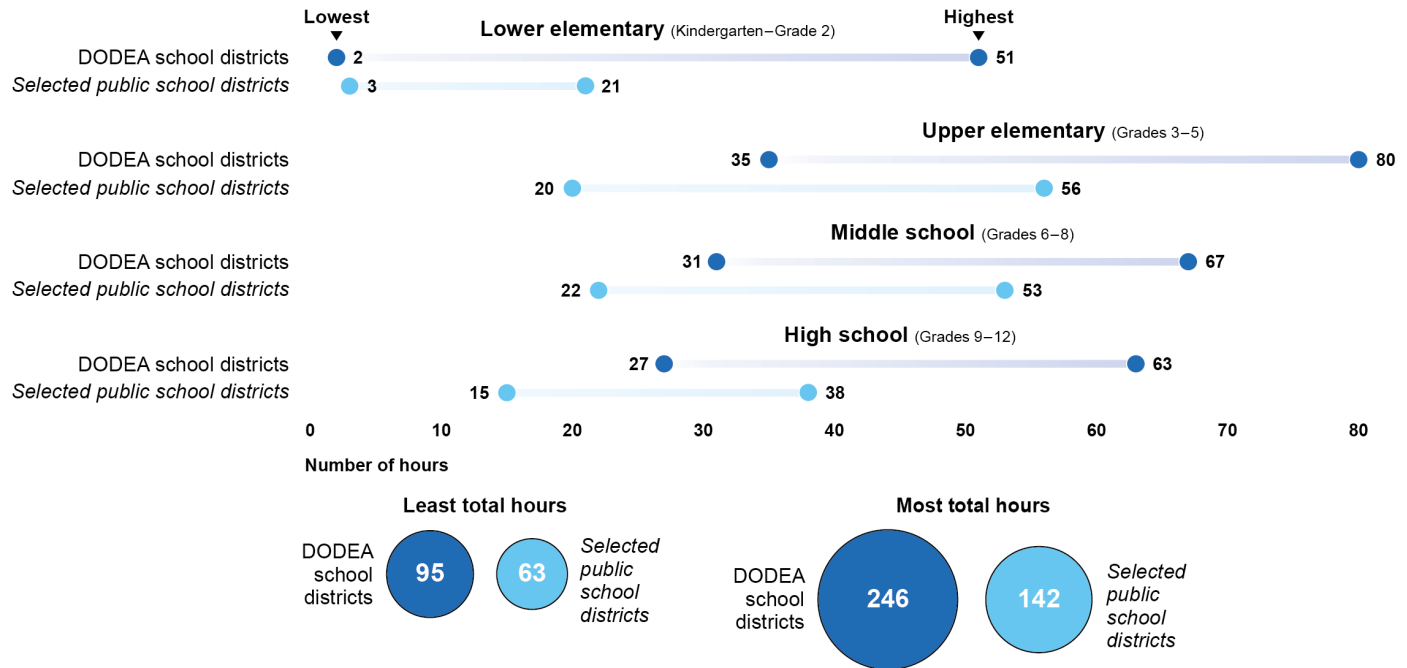
Source: Department of Defense Education Activities (DODEA) headquarters and district responses to GAO questionnaire. | GAO-24-106322

Note: Information on selected public school districts is from a nongeneralizable sample of nine traditional public school districts across seven states. The public school districts were located near large military installations and in some cases, near DODEA schools. We defined time spent on tests as the maximum amount of time, in minutes, that a student without accommodations is allowed to complete the test. For untimed tests, we asked for the typical amount of time a student without accommodations spends on the test.

Across all grades, time spent on required standardized tests varied more widely among DODEA districts than among the nine public school districts we reviewed (see fig. 5). The widest range in time spent on testing was in lower elementary school. Specifically, DODEA districts ranged from 2 to 51 hours of testing per student in these grades, while the nine public districts ranged from 3 to 21 hours.



**Figure 5: Range of Time Spent on Required Standardized Tests in DODEA School Districts and Nine Selected Public School Districts, School Year 2022–23**



Source: Department of Defense Education Activities (DODEA) headquarters and district responses to GAO questionnaire. | GAO-24-106322

**Accessible Data for Figure 5: Range of Time Spent on Required Standardized Tests in DODEA School Districts and Nine Selected Public School Districts, School Year 2022–23**

Category	DODEA school districts lowest	DODEA school districts highest	Selected public school districts lowest	Selected public school districts highest
Lower elementary (Grades Kindergarten–2)	2	51	3	21
Upper elementary (Grades 3–5)	35	80	20	56
Middle school (Grades 6–8)	31	67	22	53
High school (Grades 9–12)	27	63	15	38
Average total hours	95	246	63	142

Source: Department of Defense Education Activities (DODEA) headquarters and district responses to GAO questionnaire. | GAO-24-106322

NOTE: We looked for least and most amount of time across all districts for each grade band. We added hours across the grade bands to create totals for districts. Therefore, grade band minimums and maximums may not sum to totals because they come from different districts. Information on selected public school districts is from a non-generalizable sample of nine traditional public school districts across seven states. The public school districts were located near large military installations and in some cases, near DODEA schools. We defined time spent on tests as the maximum amount of time, in minutes, that a student without accommodations is allowed to complete the test. For untimed tests, we asked for the typical amount of time a student without accommodations spends on the test.

### What steps is DODEA taking to minimize any redundant standardized tests across all districts?

#### Balanced Assessment System Working Group

In response to a working group convened in 2021 to evaluate its Comprehensive Assessment System, DODEA has taken steps to identify and address redundancies in standardized tests across its schools. Through the working group, DODEA worked with over 150 educators to develop recommendations on DODEA’s testing policies and practices, including to eliminate testing redundancies.



The Balanced Assessment System Working Group made a total of 62 recommendations regarding testing policies and practices, most of which were outside the scope of our review. According to DODEA officials, six of the recommendations could potentially address unneeded tests and unnecessary testing time.<sup>8</sup> Of these, four recommendations would have certain tests be administered DODEA-wide, resulting in fewer locally administered tests. One would eliminate system-wide end of year tests in multiple subjects in favor of shorter mid-years tests. Lastly, one aims to reduce the overall number of days spent on standardized tests. Agency officials told us that implementing all six recommendations would result in less variation across districts in time students spend on standardized tests, and reduce total testing time in districts where students currently spend the most time on tests.

DODEA started to implement some of these recommendations during the 2022–2023 school year. For example, officials told us they eliminated mid-year math tests for secondary students that were required DODEA-wide because the tests were not sufficiently aligned with DODEA’s math curriculum. Agency officials also told us that over the next few school years, they plan to eliminate all of the longer math and reading mid-year tests currently required in the Comprehensive Assessment System, in favor of DODEA-wide shorter, more frequent test check-ins.

### **Implementing and engaging stakeholders on future testing plans**

The November 2021 memorandum establishing the working group states that the working group would develop a five year implementation plan for the recommendations, as well as oversee the implementation. The purpose of an implementation plan is to monitor progress toward making changes and increase accountability and communication with stakeholders. DODEA officials told us they want to move forward on almost all 62 recommendations and provided us with a draft implementation plan in July 2023.

The draft implementation plan provides information on how general areas of work would be executed through spring 2027, but does not include information about how progress would be tracked and reviewed, how any necessary changes would be identified, or how the plan would be formally completed. Leading project management practices from the Project Management Institute and prior GAO work call for project management plans to include these components.<sup>9</sup> The draft plan also does not explain how stakeholders would be involved in decision-making and execution. Leading project management practices also call for a stakeholder engagement plan, which identifies the strategies and actions required to promote productive involvement of stakeholders in decision-making and execution.<sup>10</sup>

An implementation plan that adheres to leading project management practices is an important tool to oversee and measure progress, as well as increase accountability and transparency for those implementing the plan. In addition, such a plan could help clearly communicate to DODEA districts, schools, teachers, and families about the steps the agency is taking to streamline standardized tests and time spent on testing, and when to expect changes.

## **Conclusions**

The purpose of standardized testing in DODEA's Comprehensive Assessment System is to provide DODEA with essential information to improve student learning based on students' demonstrated mastery of skills and content. The Balanced Assessment System Working Group made recommendations to improve DODEA's testing policies and practices, including six recommendations that aim to reduce testing time and eliminate potentially redundant tests. DODEA has begun implementing some of these recommendations. However, its draft implementation plan does not follow several leading project management practices for ensuring follow through on these efforts. Specifically, the plan does not include information on how implementation would be tracked and reviewed and how stakeholders would be involved. Absent an implementation plan that incorporates these practices, DODEA is hindered in its ability to monitor progress toward improving its testing system and to provide accountability, transparency, and communication about its efforts.

### **Recommendation for Executive Action**

The Secretary of Defense should ensure that DODEA's implementation plan for the recommendations from the Balanced Assessment System Working Group comports with leading project management practices by including information about how progress will be tracked and reviewed, and how stakeholders will be involved.

### **Agency Comments and Our Evaluation**

We provided a draft of this report to DODEA for review and comment. In its written comments, which are reproduced in appendix I, DODEA agreed with the recommendation.

In its response to our draft report, DODEA noted that it developed an implementation plan for the Balanced Assessment Working Group findings that were based on the initial documents designed to garner stakeholder support. The draft report on which DODEA commented acknowledges these efforts, but DODEA has not yet provided an updated plan that comports with leading project management practices, such as how progress will be tracked and reviewed. We look forward to reviewing such a plan when one becomes available.

### **How GAO Did This Study**

#### **Standardized testing in DODEA schools**

To examine standardized testing practices in DODEA schools and the time spent on them, we used a questionnaire to collect relevant data from DODEA headquarters and all DODEA districts on tests administered in the 2022-23 academic year. To ensure the validity and reliability of our questionnaire, we pretested it with relevant officials and made revisions as appropriate.

In our questionnaire, we defined required standardized tests as an assessment that is both (1) required of all students in a given grade; and (2) scored in the same, predetermined way. We asked districts not to include standardized tests given to only specific groups of students, such as English language proficiency tests. We defined time spent on tests as the maximum amount of time, in minutes, that a student without accommodations is allowed to sit for the entire test. For untimed tests, we asked for the typical amount of time a student without accommodations spends on the test.

We reviewed agency documents on testing policies, testing calendars, and descriptions of tests at every grade level. We interviewed officials in charge of testing policy in all three DODEA regions, and seven of the eight districts.<sup>11</sup>

To describe changes DODEA plans to make to its testing policy we reviewed recommendations from DODEA's Balanced Assessment System Working Group,

established in 2021, which examined DODEA's assessment policies and practices. We reviewed documents and interviewed DODEA officials regarding current testing policies and plans for implementing the working group's relevant recommendations. We compared DODEA's plans to leading project management practices.

### **Standardized testing in selected public school districts**

To examine which standardized tests are administered and how much time students spend on them in traditional public school districts, we sent the same questionnaire to 22 districts in 10 states: Alabama, Georgia, Kentucky, North Carolina, New York, South Carolina, and Virginia (selected because they are the seven states with DODEA schools) and California, Florida, and Texas (selected because they have the highest number of large military installations in the continental United States.)<sup>12</sup> We received responses from nine districts across seven states. Because this is a non-generalizable sample, the responses cannot be used to make conclusions about the population of traditional public school districts.

In states with DODEA schools, we selected districts near military installations having DODEA schools. In states with the highest number of large military installations, we selected districts recognized by their state for how they serve military-connected families and that were not near a DODEA school.

We interviewed state officials in Kentucky and Virginia to learn about variations in testing requirements throughout school districts in the state. We chose these two states because they represent states in the DODEA Americas Region, and have DODEA schools serving kindergarten through 12th grade.

We conducted this performance audit from October 2022 to October 2023 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

### **List of Addressees**

The Honorable Jack Reed  
Chairman  
The Honorable Roger Wicker  
Ranking Member  
Committee on Armed Services  
United States Senate

The Honorable Mike Rogers  
Chairman  
The Honorable Adam Smith  
Ranking Member  
Committee on Armed Services  
House of Representatives

### **GAO Contact Information**

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**Staff Acknowledgments:** In addition to the contact named above, Jennifer Gregory (Assistant Director), Alexandra Squitieri (Analyst-in-Charge), Maggie Baucom, James Bennett, Charlotte Cable, Ryan D'Amore, Gina Hoover, Cady Summers Panetta, and James Rebbe made key contributions to this report.

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## **Appendix I: Comments from the Department of Defense Education Activity**



MANPOWER AND  
RESERVE AFFAIRS

**ASSISTANT SECRETARY OF DEFENSE**  
1500 DEFENSE PENTAGON  
WASHINGTON, D.C. 20301-1500

SEP 28 2023

Ms. Jacqueline M. Nowicki  
Director, Education, Workforce, and Income Security Issues  
U.S. Government Accountability Office  
441 G Street, NW  
Washington DC 20548

Dear Ms. Nowicki,

This is the Department of Defense (DoD) response to the GAO Draft Report GAO-24-106322, "K-12 Education: Better Planning Could Help DoD Schools Implement Changes to Standardized Testing," (GAO Code 106322).

Attached is DoD's response to the subject report. My point of contact is Mr. Jeffrey Noel who can be reached via email [Jeffrey.Noel@DoDEA.edu](mailto:Jeffrey.Noel@DoDEA.edu) or 202-368-5451.

Sincerely,

for Grier Martin  
Performing the Duties of the Assistant Secretary  
of Defense for Manpower and Reserve  
Affairs

Attachments  
As stated

GAO DRAFT REPORT DATED AUGUST 31, 2023  
GAO-24-106322 (GAO CODE 106322)

**“K-12 EDUCATION: BETTER PLANNING COULD HELP DOD SCHOOLS  
IMPLEMENT CHANGES TO STANDARDIZED TESTING”**

**DEPARTMENT OF DEFENSE COMMENTS  
TO THE GAO RECOMMENDATION**

**RECOMMENDATION 1:** The GAO recommends that the Secretary of Defense should ensure that Department of Defense Education Activity’s (DODEA) implementation plan for the recommendations from the Balanced Assessment System Working Group comports with leading project management practices by including information about how progress will be tracked and reviewed, and how stakeholders will be involved.

**DoD RESPONSE:** The DoD concurs with the GAO’s recommendation. As planned, DoDEA developed an implementation plan for the Balanced Assessment Working Group findings that were based on the initial documents designed to garner stakeholder support.

**Accessible Text for Appendix I: Comments from the Department of  
Defense Education Activity**

SEP 28 2023

Ms. Jacqueline M. Nowicki  
Director, Education, Workforce, and Income Security Issues  
U.S. Government Accountability Office  
441 G Street, NW  
Washington DC 20548

Dear Ms. Nowicki,

This is the Department of Defense (DoD) response to the GAO Draft Report GAO-24-106322, "K-12 Education: Better Planning Could Help DoD Schools Implement Changes to Standardized Testing," (GAO Code 106322).

Attached is DoD's response to the subject report. My point of contact is Mr. Jeffrey Noel who can be reached via email Jeffrey.Noel@DoDEA.edu or 202-368-5451.

Sincerely,

for Grier Martin  
Performing the Duties of the Assistant Secretary of Defense for Manpower and Reserve Affairs

Attachments As stated

GAO DRAFT REPORT DATED AUGUST 31, 2023 GAO-24-106322 (GAO CODE 106322)

“K-12 EDUCATION: BETTER PLANNING COULD HELP DOD SCHOOLS IMPLEMENT CHANGES TO STANDARDIZED TESTING”

DEPARTMENT OF DEFENSE COMMENTS TO THE GAO RECOMMENDATION

RECOMMENDATION 1: The GAO recommends that the Secretary of Defense should ensure that Department of Defense Education Activity's (DODEA) implementation plan for the recommendations from the Balanced Assessment System Working Group comports with leading project management practices by including information about how progress will be tracked and reviewed, and how stakeholders will be involved.

DoD RESPONSE: The DoD concurs with the GAO's recommendation. As planned, DoDEA developed an implementation plan for the Balanced Assessment Working Group findings that were based on the initial documents designed to garner stakeholder support.

## Endnotes

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<sup>1</sup>The DODEA Americas Region comprises Southeast and Mid-Atlantic districts; schools are located in Alabama, Georgia, Kentucky, North Carolina, New York, South Carolina, Virginia, Puerto Rico, and Cuba. The Europe Region comprises Europe East, Europe South, and Europe West districts; schools are located in Bahrain, Belgium, Germany, Italy, Netherlands, Spain, Turkey, and United Kingdom. The Pacific Region comprises Pacific East, Pacific South, and Pacific West districts; schools are located in Guam, Japan, and South Korea. DODEA also operates a fully virtual school.

<sup>2</sup>In 2015, DODEA began implementing new academic standards—known as College and Career Readiness Standards—to improve educational rigor and increase educational continuity for DODEA's highly mobile student population.

<sup>3</sup>For purposes of this report we use the phrase “federal requirements” to refer to the assessment requirements under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended (ESEA). See 20 U.S.C. § 6311(b)(2). These assessments are required for states receiving assistance under Title I, Part A of ESEA, and must be aligned with the state's academic standards. 20 U.S.C. § 6311(b)(2)(B)(ii). DODEA does not receive Title I funds and is not required to conduct these assessments.

<sup>4</sup>Federal requirements refer to “reading or language arts.” We use the term “literacy” for consistency with DODEA's terminology. In addition, federal requirements include that English language proficiency tests be administered annually to English learners. 20 U.S.C. § 6311(b)(2)(G). DODEA administers English language proficiency tests as well.

<sup>5</sup>DODEA regulation 1301.01 established the Comprehensive Assessment System in 2018.

<sup>6</sup>One district in DODEA's Pacific region did not require any additional standardized tests at the district level. As in other public schools, DODEA high school students can opt to take standardized tests such as Advanced Placement tests.

<sup>7</sup>The length of a school day varies. We used 6.5 hours as an approximation.

<sup>8</sup>Some of the recommendations are beyond the scope of our review, such as recommendations on which testing platform to use or on which calendar day a test should be administered.



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<sup>9</sup>Project Management Institute, Inc., *A Guide to the Project Management Body of Knowledge (PMBOK® Guide)*, Seventh Edition (Newton Square, PA: 2021). See also GAO, *Veterans Justice Outreach Program: Further Actions to Identify and Address Barriers to Participation Would Promote Access to Services*, [GAO-21-564](#) (Washington, D.C.: Sept., 2021). Monitoring and controlling are the processes required to track and review progress, and identify any needed changes.

<sup>10</sup>DODEA officials provided us with a draft of an email that they planned to send throughout the agency at the end of August 2023, outlining actions the agency plans to take over the next five years related to assessment issues identified through the working group.

<sup>11</sup>When we arranged these interviews, we asked regional officials to include representatives from at least two of three districts in their region.

<sup>12</sup>Georgia and Virginia were also part of the second selection group of states with the highest number of large military installations.