

# MINNESOTA

## STATE OPPORTUNITY ANALYSIS

### DECEMBER 2023

Minnesota has made progress in establishing structures, resources and policies that encourage the creation of personalized learning and competency-based environments for K-12 students. The state has an opportunity to further support districts in leveraging these opportunities, update existing structures and introduce new ones where appropriate. Growing implementation interest from across the metro area and greater Minnesota makes this an opportune time for forward-thinking state action.

Based on KnowledgeWorks research, Minnesota can strengthen state-level supports in three different areas.

### **Fostering a Culture of Innovation**

First, Minnesota can build on existing structures to foster a stronger culture of innovation that bolsters personalized and competency-based learning. The state could begin by creating a well-defined vision that identifies the range of knowledge, skills and dispositions that students need to be future ready. Beyond vision, Minnesota already has a number of essential policy structures to advance these practices in place. The state could develop clearer policy language and guidance around how schools and districts can leverage these structures. The state might also consider creating new structures such as intermediaries and networks to better

support districts seeking to deepen student-centered learning. Throughout this process, the state should engage in a meaningful dialogue with districts to identify opportunities to address roadblocks to innovation.

### **Comprehensive Support for Educators and Leaders**

Minnesota can also consider how to more comprehensively support educators and leaders in developing their understanding of effective personalized learning practices. The state currently offers opportunities for educators to engage in areas essential to creating personalized learning environments, such as culturally responsive practice and instruction. The state could build on these opportunities by more closely integrating customized learning opportunities oriented around personalization into pre-service teaching programs and professional development offerings. Resources like the Standards of Effective Teaching Practices could also more clearly define personalized elements for educators. Existing networks and resources could be retooled to incorporate additional opportunities for personalized professional development. Additionally, the state could consider how to begin studying the impact of high-quality personalized learning preparation and development on a holistic range of student outcomes.

### **Student-centered Approaches to K-12 Assessments**

Minnesota has an opportunity to explore how to deeply integrate student-centered approaches into its system of K-12 assessments. The state already convened a working group in 2017 to begin exploring this topic. As a next step, policymakers could consider reexamining the working group's recommendations and identify action opportunities. Minnesota policymakers could create opportunities for local communities to begin exploring innovative assessment approaches by creating a legislative pilot program and banks of model performance tasks. The state could also consider how best to engage stakeholders in this work both by leveraging existing opportunities and creating new ones where necessary.

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# INTRODUCTION

In 2016, the Association of Metropolitan School Districts (AMSD) convened a group of superintendents and community stakeholders to engage with possibilities for the future of education in Minnesota. That group emerged with a call to action for education transformation in the state. This call to action specifically noted that:

*All students and all Minnesotans will reap enormous benefits when we create lasting equity, integration and excellence in our education system. Aside from fulfilling the moral and constitutional imperative of equal opportunity for all, ensuring an equitable, integrated and excellent education for all students will secure the highly skilled workforce Minnesota needs to compete in the rapidly changing global economy.*

This call to action led to the 2018 report titled [Reimagine Minnesota: A Collective Education Roadmap for Action](#). The roadmap specifically includes proposed strategies that prioritize personalized and student-centered education. Notably, one strategy calls for all students in Minnesota to have access to equitable personalized learning opportunities and includes a set of action steps to help achieve that goal.

Interest in personalized learning across greater Minnesota has continued to grow. AMSD regularly hears from school board members and superintendents about their desire to create personalized learning environments for their students, as well as the barriers that may make it challenging to do so. Building on the Reimagine Minnesota Roadmap, the following analysis is intended to support not only AMSD but education leaders across the state as they continue to advocate for policy and state level system changes to better support the creation of personalized learning environments. The three topics, selected based on [stakeholder feedback](#) collected through a statewide AMSD survey in mid-2023, included:

- **Creating a culture of innovation**
- **Supports for educators and leaders**
- **K-12 assessments**

This document provides an overview of key takeaways and recommendations crafted through a comprehensive overview of Minnesota's current policy environment in these three areas. For a more detailed understanding of this overview, see the accompanying evidence document.

## What is Personalized Learning?

Minnesota does not have a formalized, statewide definition of personalized, competency-based learning. However, the Minnesota nonprofit Education Evolving has crafted its own [seven-part definition](#) of student-centered learning, which could serve as the basis for a statewide definition. This definition includes the following principles:

- **Positive Relationships.** Students develop strong relationships with other students and with adults who care about them, believe in their potential and hold them to high expectations.

- **Foundational Needs Met.** Students are supported in meeting fundamental physical, psychological and safety needs. Students get help navigating social services, or may receive them directly in a community school environment.
- **Positive Identity.** Students are fully embraced for who they are, in the context of their communities and cultures, and feel that they belong. They develop a positive sense of their own identities, including elements such as race, ethnicity, gender and sexual orientation and see those identities reflected at school.
- **Student Ownership and Agency.** Students take responsibility for their learning, exercising choice to pursue their interests and passions, and agency to shape their school environment. Teachers serve increasingly as facilitators and guides.
- **Real-world Relevant.** Students solve problems that exist in the real world, learning skills and knowledge in a multidisciplinary context that they will use in their future lives and careers.
- **Competency-based.** Students advance by demonstrating mastery of clearly articulated learning objectives, rather than by age, receiving extra support when they struggle and new challenges when they're ready to move on.
- **Anytime, Anywhere.** Students have flexibility in when and where they learn within the school, as well as places outside of school (at home, in the community, at local businesses, etc.) and times beyond the typical school day and year.

The national nonprofit the Aurora Institute has also established a [seven-part definition](#) of competency-based education that is similar in many respects to Education Evolving's definition. This definition is used by practitioners and policy makers across the country and serves as another example for policymakers and practitioners to consider.

In the Aurora Institute's definition of a personalized, competency-based system:

1. Students are empowered daily to make important decisions about their learning experiences, how they will create and apply knowledge and how they will demonstrate their learning
2. Assessment is a meaningful, positive and empowering learning experience for students that yields timely, relevant and actionable evidence
3. Students receive timely, differentiated support based on their individual learning needs
4. Students progress based on evidence of mastery, not seat time
5. Students learn actively using different pathways and varied pacing
6. Strategies to ensure equity for all students are embedded in the culture, structure and pedagogy of schools and education systems
7. Rigorous, common expectations for learning (knowledge, skills and dispositions) are explicit, transparent, measurable and transferable

## About the State Policy Framework for Personalized Learning

The [State Policy Framework for Personalized Learning](#) was created by KnowledgeWorks to help states answer the question, “What would it take to ensure every student has the opportunity to learn in a student-centered education system?” Many states have begun to implement next generation learning models that center students’ needs and interests, and an increasing number have begun to consider what it would take to expand these innovations statewide.

After extensive research into high-functioning education systems and conversations with innovative practitioners and policymakers, KnowledgeWorks released a framework with 12 policy conditions organized into four strategy areas critical to statewide transformation. This framework offers a set of policy actions within each condition, guiding states through the design of a unique pathway to statewide transformation of student-centered learning. This Minnesota Opportunity Analysis explores three of the policy conditions discussed in their State Policy Framework for Personalized Learning.

## How to Use This Report

This report includes an analysis of and recommendations for three policy conditions within KnowledgeWorks 12-part policy framework: Culture of Innovation, Comprehensive Supports for Educators and Leaders and Systems of Assessment. A sub-policy condition, graduation requirements, was added at AMSD’s request. An accompanying evidence resource details the supporting documentation that informed the key takeaways and recommendations included in this document.

This analysis represents KnowledgeWorks understanding of the state’s current policy context. It also identifies potential tangible recommendations where the state could build on its existing body of work and continue developing toward a system that supports high-quality learning environments for all students. The evidence in this report was collected through two phases of research. The first phase included extensive analysis of Minnesota’s laws, regulations, programs and initiatives. The second phase included interviews with key stakeholders across the state. These recommendations should be viewed either as starting points for continued conversation or as opportunities for developing actionable agenda items.

## Students at the Center

This work represents a continuation of AMSD’s 2018 Reimagine Minnesota report. Where possible the recommendations are designed to build on that framework to lead to classroom experiences that personalize learning to meet each student’s needs and goals. Making these policy improvements is essential to ensuring high-quality personalized learning.

## Methods

The analysis for each policy condition is based on a set of indicators from the KnowledgeWorks framework, which describe elements of the policy condition essential for systems transformation. The accompanying evidence document is organized to show which data were used by the assessment team to support the analysis of each of the following indicators:

- **Alignment:** The state partners with a coalition of diverse stakeholders to create a shared vision for student success and increasingly aligns all levels of governance, functions and resources to that vision. Alignment should occur at the local and state levels, within the state education agency and across all relevant state agencies.

- **Equity:** The state leverages data to illuminate opportunity gaps and disparities in outcomes while engaging historically marginalized yet resilient communities to design solutions that improve equity across all levels of the system. Personalized learning ensures that every student has what they need to succeed, emphasizing student agency and targeted supports for student learning.
- **Shared Ownership:** The state proactively engaged diverse stakeholders in the design and implementation of personalized learning systems, progressing toward shared ownership of the system design and decision-making around implementation. Local communities are empowered to work alongside the state and share accountability for education practices and outcomes.
- **Transformative School Models:** The state builds the capacity of districts to move from transitional pilot programs to mature, evidence-based personalized teaching and learning models. The state implements ongoing quality assurance measures to drive student success by leveraging transparency, stakeholder engagement and evidence-based decision making.

## Additional Resources

[State Policy Framework for Personalized Learning](#) from KnowledgeWorks



For additional details on Minnesota’s policies, please see the [evidence document](#).





# CULTURE OF INNOVATION AND GRADUATION REQUIREMENTS

The state advances personalized learning by empowering educators, researchers, communities and families to design, refine, evaluate and advance new learning models that better support student needs. A culture of innovation leverages policy flexibility coupled with necessary resources and supports to identify and advance practices and aligned policies that drive equity and maximize student outcomes.

To cultivate systems change, states create a culture of innovation by:

- Providing policy flexibility to catalyze improvements to the education system
- Evaluating student-centered practices for informed policymaking and investment
- Establishing learning networks to support the scaling of innovative practices

In addition, state graduation requirements enable students to explore career interests and are aligned to statewide competencies enabling students to be ready for postsecondary and workforce success regardless of pathway(s) chosen.

## Key Takeaways

Minnesota’s “standards-based” education system is anchored in the Carnegie unit. This approach is common to many states. Yet Minnesota has gone further than some in adopting benchmarks, as well as career and college competencies, that include the skills and dispositions students need for postsecondary success. Minnesota’s policy system also includes various opportunities allowing credit to be earned without the need for a student to complete a year-long course. The place and pace of learning can also largely be determined locally with options for students such as project-based programs, service learning experiences, apprenticeship and other work-based learning programs.

Minnesota empowers educators to adopt graduation requirements that exceed the state’s by working with each high school student to create a comprehensive Personal Learning Plan, and developing curriculum and instruction to support every student in meeting standards and benchmarks. The state has also invested funding and other resources that may be used to build district capacity for innovative and student centered models, though none explicitly for personalized or competency-based learning. Charter schools appear to benefit most from state-authorized flexibility within and exemptions from policy.

Other structures, including district-created site-governed schools and Innovative Research Zones, have created opportunities to use policy flexibility in designing, refining and scaling personalized learning. Despite these enabling policies, the absence of clear guidance or administrative regulations from the Minnesota Department of Education (MDE) specifying the full extent of flexibility



that can and should be used by districts to personalize learning - as well as MDE's explication of statutory requirements - risks leading districts to overly narrow interpretations that steer districts away from personalization.

There is an opportunity for the state to carry out research and evaluation that can be disseminated broadly and used to support scaling. It is important to consider data collection/reporting burdens placed on districts and schools, including eliminating any duplicative reporting requirements, while maximizing benefits by making state data collections useful to stakeholders. The state should also consider the value of the reports that it collects and determine which, if any, could be merged or discontinued.

## Recommendations

1. The Minnesota legislature should consider codifying a definition of personalized, competency-based learning by specifically modifying language in Minnesota Statutes, section 120B.018 and 120B.02.
2. The Minnesota legislature should consider redefining the definition of a credit in statute to center fully on mastery of content based on the Minnesota Academic Standards, rather than time spent in a classroom, by adding to the definitions in Minnesota Statutes, section 102B.018.
3. The Minnesota legislature should consider expanding the state's statutory definition of 'seat-time' in Minnesota Statutes, section 120A.41 to include activities taking place outside of the traditional classroom setting. This could include, but should not be limited to, apprenticeships, work-based learning, community-based learning opportunities and other activities.
4. Minnesota's Department of Education should be encouraged to develop clear policy structures and guidance that gives local districts a well-defined pathway to develop competency-based structures around which to organize education. These structures and guidance should streamline the process to develop these structures. Guidance should include clarity on flexibilities such as the mastery alternative to academic year course completion for course credit, as well as programs such as the Site Decision-Making Grant Program, Innovative Delivery of Career and Technical Education Programs and Innovative Research Zone pilot.
5. In order to advance deeper learning and college and career readiness, the Minnesota legislature should consider requiring the Minnesota Department of Education develop a 'model' statewide portrait of a graduate to serve as an exemplar resource for schools and districts seeking to implement and assess personalized, competency-based learning. The portrait should be co-developed with schools, districts and communities across the state - however, it should not come with a requirement for adoption. It could be added to Minn. State Statute 120B.11.
6. Minnesota should consider creating and funding a statewide intermediary organization to provide the policy knowledge, guidance and technical assistance necessary for schools and districts to develop and implement student centered structures. The intermediary could live in a number of locations, including MDE, as a public-private partnership, as a separate non-profit or within an institution of higher education.
  - The Minnesota intermediary should create a set of model competencies aligned to the statewide portrait of a graduate. These competencies should be co-designed with state level policy makers, and competencies should align to existing resources of similar design, such as the state's college and career ready competencies.

- If the intermediary is not housed within MDE, Minnesota stakeholders should advocate for the creation of a staff position or an office within the Department of Education with the responsibility to coordinate policy and district support relative to school and district innovation toward personalized learning. This person/office would work with a statewide intermediary.
7. Minnesota should consider establishing and supporting a personalized learning network for districts and schools. This network should ideally be sustained with public funds to support its staffing and resource needs. The network should also be given funding to study the impact of emerging models for the purposes of replication and sharing best practices.
  8. Minnesota's legislature should consider establishing a working group to study existing policy structures and identify and address potential or perceived constraints to student-centered and innovative education models, such as those that result from attendance requirements, funding and its connection to attendance, the number and nature of statewide reporting requirements and the use of "consistent attendance" as defined in the Minnesota Automated Reporting Student System (MARSS) manual in school accountability determinations. This working group would be co-led by MDE staff and district leaders and the commissioner should ensure that representatives from all impacted departments are represented in its work in addition to community stakeholders. It could be housed within the intermediary proposed under recommendation six.
  9. Minnesota's Department of Education should be encouraged to establish a cross-agency research and development team which would oversee the Evidence-Based Education Grants evaluation process and use the work to expand and deepen current efforts to identify effective strategies which would support district implementation, with a student-centered focus.
  10. Minnesota's Department of Education should consider establishing clear guidance on the ways that state and federal funding can be used to build the capacity of districts, schools and community partners in designing high-quality personalized learning experiences for students, particularly in areas with the greatest need. In developing this guidance, the state should emphasize opportunities to create funding efficiencies through blending and/or braiding of existing funding streams.
  11. Minnesota should also consider whether creating a statewide funding grant with an accompanying application process related to personalized, competency-based education might be appropriate. This proposal could replicate the competency-based grant proposal under the 2022 state budget, which modified Minnesota Statutes, section 120B.02 and 124D.901.



# COMPREHENSIVE SUPPORTS FOR EDUCATORS AND LEADERS

The state invests in systemic efforts to build professional capacity for the implementation of high-quality personalized learning systems. These systemic efforts align educator and school leader preparation, credentialing, professional development and evaluation systems into a seamless continuum that personalizes supports for educators and school leaders so they can deepen their professional expertise and raise the quality of leadership and instruction.

To build capacity for personalized learning, states create comprehensive supports for educators and leaders by:

- Developing culturally responsive, personalized educator and leadership competencies
- Centering competency-based education practices in pre-service programs
- Encouraging co-designed, authentic and personalized professional learning
- Creating and supporting innovative staffing structures

## Key Takeaways

In 2023, Minnesota updated the [Standards of Effective Practice](#), which defines clear expectations for teacher preparation and practice that require educators to show they have acquired the knowledge and skills needed to be effective in a Minnesota classroom. The state is in the early stages of aligning the state's educator workforce system with these new standards. Minnesota has not yet created a vision that is anchored in personalized learning and while much of the work across the state is promising, this overall lack of a cohesive vision in this area hinders broader adoption. In describing what it means to achieve effective practice the state does provide for a holistic, educational vision and supports school culture.

Through some state programs and resources as well as external organizations, including the [Association of Metropolitan School Districts](#) (AMSD) and Education Evolving, educators are encouraged and supported in incorporating aspects of personalized learning environments into their classes. Minnesota also provides a variety of opportunities for educators and leaders to participate in training on many topics, including culturally responsive practice and instruction, beginning with the state's teacher preparation programs all the way through professional development opportunities for licensed educators and leaders.

Minnesota appears to provide support to pre-service programs through clearly defined requirements for the preparation of educators and leaders and the creation of standards for educator preparation program candidates. However, it is not clear whether the state is encouraging these preparation programs to prepare candidates with skills that would be needed in order to excel in personalized learning environments. Through professional development opportunities, educator and leader networking possibilities and support from specific state and federal funding streams, Minnesota has

empowered educators and leaders to shape their own career development and pursue customized learning opportunities. By taking some small steps toward a holistic, personalized delivery of education to all of Minnesota's students, the state could develop a teacher workforce that truly personalizes learning for all students and ensures that students receive a world-class education.

## Recommendations

1. Minnesota policymakers should be encouraged to take action on recommendations relevant to educators in the Governor's 2020 Roadmap for Transformational Change in Minnesota Education. These include ensuring that the state's teacher preparation standards and standards for effective practice more clearly define competencies for educators, ensuring alignment with state academic standards and incorporating the use of student-centered learning strategies, promoting student ownership and engaging the whole student. This work would ideally be done in collaboration with teachers, local stakeholders and communities, the Minnesota Children's Cabinet, families, school leaders, policymakers, labor unions, education preparation providers and elected leaders. The state may consider reviewing [Utah's Portrait of a First Year Teacher](#) or [Virginia's Profiles of educators and/or education leaders](#) for support and guidance.
2. The Professional Educator Licensing and Standards Board (PELSB) should review and incorporate elements of personalization using a nationally recognized framework (such as [educator competencies](#)) for personalized learning at the next opportunity, either when standards are revised or in rule making.
3. Minnesota's Department of Education should be encouraged to partner with regional agencies, including the [Minnesota Service Cooperatives](#), and other statewide stakeholders. These partnerships should ensure that all statewide professional development and training opportunities are student-centered and promote students as agents of social change, and should be funded through [Title II-A](#) or other state funding streams.
4. Minnesota's Department of Education should be encouraged to ensure that professional development opportunities include a focus on classroom level student data collection through ongoing formative, interim and summative assessments so educators can effectively work to personalize instructional and behavioral supports for students in the classroom.
5. Minnesota stakeholders should consider convening educators as well as school and district leaders to review the state's teacher development and evaluation system state example model and provide recommendations to update them to reflect a focus on incorporating personalization into school environments.
6. Minnesota stakeholders might work to identify opportunities to credential educator-learning related to personalized, competency-based education, for example, by creating new certifications, including microcredentials, certificates and others, that are aligned to student-centered learning practices. These could be incorporated into the state's licensure structures.
7. Minnesota's legislature should consider creating a task force to review and revisit, if needed, the state's strategies for expanding students' access to effective educators. This would ideally include an explicit focus on educators with expertise in personalized learning instruction who are also members of underrepresented populations or who reflect the diversity of enrolled students within districts, and work to improve equitable distribution of said educators. This task force should consider strategies such as educator compensation, licensure advancement and career development.

8. Minnesota's higher education sector and non-higher education preparation programs should consider tracking and studying the impact of high-quality personalized learning preparation, professional development and other supports on student outcomes, including measures of student growth and student engagement and wellbeing. These data could be collected through PELSB's Data Summary Report or other similar data collection process in the state.



# SYSTEMS OF ASSESSMENTS

Coherent systems of formative, interim and summative assessments advance and validate learning, helping the state and its communities monitor progress against a shared vision for student mastery of knowledge and skills. Rich performance tasks provide educators, caregivers and students with useful and timely information to personalize instruction, while periodic, common assessments enable system leaders to drive equitable outcomes through more effective resource allocation and support. These systems connect seamlessly to other K-12 systems, including accountability, workforce and postsecondary, to ensure students are prepared for what comes next.

## Key Takeaways

Minnesota has been exploring the potential for deeper, student-centered approaches to assessments for almost a decade. Following the passage of the Every Student Succeeds Act (ESSA), MDE began researching the implications of new federal flexibilities including Innovative Assessment Demonstration Authority (IADA), Competitive Grants for State Assessments and the use of computer-adaptive assessments. Many committees and working groups exist or have existed to explore potential improvements to the Minnesota assessment system, including the [assessment committee](#), the [Future of Assessment Design Working Group](#) and the [Minnesota Comprehensive Assessment \(MCA\) and Alternative MCA review Committees](#).

While the groups have had many key stakeholders and have provided various recommendations to move toward a deeper, more student-centered approach to assessments, Minnesota has not taken full advantage of flexibilities to create a system of assessment that could more fully serve learners. Notably, Minnesota has not submitted an IADA application and there is no evidence to suggest that Minnesota has considered applying for this federal flexibility. It has also not leveraged opportunities within existing systems to reduce the scope of testing, explored innovations in non-tested subjects such as performance-based assessments or created opportunities for locally developed innovative assessment practices.

While committee and working group recommendations articulate a desire for greater flexibility and deeper student assessments of learning, the state of Minnesota does not have a framework of higher level skills and dispositions, such as a portrait of a graduate, that drives the use of assessment toward common goals around college and career readiness. Additionally, priority standards can be a helpful tool to drive student learning in areas that are most impactful for student success in post-secondary areas. MDE does not offer priority standards to help tailor these goals and [state guidance](#) specifically advises against the process of power or priority standards. This lack of framework or prioritization may also be a reason that the state appears to lack cohesion across local and state assessment and accountability systems. While statutory policy creates some room for districts to develop assessments that are tailored to the needs and wants of stakeholders in their

communities (e.g., commissioner must not develop statewide assessments in social studies, health and physical education and the arts according to [Minnesota Statutes, section 120B.30](#)), there is no formal connection that allows districts to tailor local assessments and influence state assessments. This lack of formal structures impacts other areas crucial to assessment, such as piloting new and innovative approaches, creating rich professional learning opportunities or statewide innovation networks or creating stronger district level supports for innovative assessment approaches.

## Recommendations

1. Minnesota's Department of Education should develop a strategy for evolving Minnesota's system of assessments to better support deeper learning. The agency should revisit the Future Assessment Design Working Group recommendations from 2017 and leverage the expertise of the MN TAC. Final recommendations should serve as the basis for application to the federal CGSA or IADA program as applicable.
2. As part of a statewide personalized learning network, Minnesota should consider establishing formal peer learning communities to support assessment literacy and creative thinking around improvements to support deeper student learning at the state and local levels related to assessment. The state might also consider leveraging existing teacher and leader networks for this purpose. The state should ensure that participation includes districts with the largest populations of historically marginalized yet resilient students. As a place to start, this could be an assessment coordinator mentoring network, as was recommended by the [Future of Assessment Design Working Group](#).
3. Minnesota should consider developing a legislative pilot program for districts to test and evaluate student-centered approaches to assessment. The pilot program should give districts authority to pilot deeper learning assessments in non-ESSA required subjects or in lieu of traditional graduation requirements. The state should ensure that participants in the pilot program have the resources and support to equitably participate, including access to a network of peers and additional funding.
4. Minnesota's Department of Education should explore development of a model collection of performance tasks that educators could consider integrating into their curriculum to support high-quality student-centered learning. These tasks could also provide a basis for awarding credit based on mastery as defined in state statute. Educators and districts should also have an opportunity to contribute locally developed tasks to this bank.
5. Minnesota should ensure that teacher preparation programs, initial teacher licensure and re-licensure and professional learning opportunities support knowledge of and training around innovative assessment practices, including performance assessment design for competency-based learning and assessment literacy.
6. Minnesota's Department of Education could expand the responsibilities of the [Local Assessment and Advisory Committee](#) to create stronger coordination between state and local stakeholders as it relates to assessments, specifically to promote greater integration of local assessments into state accountability measures. Minnesota could also study best practices around state and local assessment practices and consider ways to audit assessment practices to ensure all assessments are of high technical quality and aligned to state standards.
7. Minnesota stakeholders could collectively advocate for more student-centered approaches to assessment at the state and federal level. This could include changes to legislation, regulatory language or guidance and a push for Minnesota to apply for federal flexibilities.

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