

April 18, 2012

Dr. John King, Jr., Commissioner
New York State Education Department
89 Washington Avenue
Albany, New York 12234

Dear Commissioner King:

On behalf of the Software & Information Industry Association (SIIA) and our member high-tech companies, I write regarding the recent New York State Education Department (NYSED) notice of intent to release requests for proposals (RFPs) to develop, test, deploy and support an Education Data Portal (EDP), posted February 23, 2012 and updated April 4, 2012. We understand the EDP project will include both a Data Dashboards RFP and a Content Management and System Services RFP. SIIA makes a request for clarity related to expected integration with the Shared Learning Infrastructure (SLI).

SIIA is the principal trade association for the software and digital content industry, including some 180 developers of digital content, software applications, data systems, e-learning and related technologies used in K-12 and postsecondary education curriculum, instruction, assessment and classroom/enterprise management. SIIA and our member companies have long collaborated with education leaders, policymakers and other stakeholders to improve education through the use of innovative learning technologies.

Specifically, on behalf of SIIA members who may respond to the NYSED RFPs, I write to ask for clarity in the RFPs regarding the expected compatibility of responding technologies with SLI. We understand that New York is a Phase I state in the Shared Learning Collaborative (SLC), and that NYSED intends to leverage the data store and application interfaces of the SLI in the implementation of EDP.

We seek clarity on how, when and to what degree, RFP respondents must specify their interoperability with the SLI. To date, the only available SLI technical specifications are the SLI application programming interface (API) and the data ingestion specification. Those API specifications for SLI were just released, are subject to change, and do not currently provide a mechanism by which vendors can test their integration with SLI. Only the single vendor, which received the SLI development contract, has had access to the specification and actual software code to date. As a result, it is difficult to ensure that proposed solutions are compatible with the SLI. In order for vendors to create a complete proposal and schedule, including for integration testing, it is essential that they have access to both a final API as well as understanding of the timeline and process for API modifications and testing.

Related questions include:

- When will a final, stable API be available against which a vendor could develop to meet NYSED's requirements?
- Will the state take steps to ensure stability over a significant period of time?
- When will the environment be available for a vendor to test SLI integration?

For a vendor to develop against it, they must understand both that the specification will be stable for some period of time and the process and timeline for update.

We know that the NYSED values an open, competitive process, as do SIIA and our member companies. We therefore encourage NYSED to address the following for the impending EDP RFP so that vendors can anticipate requirements and costs:

- clarify that interacting with SLI via its already published API will sufficiently satisfy the state's requirements and evaluation criteria used by application reviewers, or if not, then provide a timeline for release of a stable API that will meet the state's requirements; and
- ensure the timely release of more detail regarding the technical specifications of the SLI as would be needed for RFP respondents to demonstrate their further technical integration.

In the long-term, we hope you can also help address, or provide a timeline and process for addressing, several questions below related to long-term SLI governance and business models in so far as they have significant impact on the NYSED EDP and vendors. SIIA requests that you work with the SLC moving forward to ensure the following questions are addressed in as timely and complete manner as possible:

- What is the long-term governance model for SLI, including governance over the SLI code and specification?
- How and to what degree will the SLI align with other existing, widely adopted technical standards and standards communities? Such alignment currently appears limited and specific future alignment plans are not yet known.
- What is the long-term business model for supporting, owning, and licensing the SLI assets? Could NYSED confirm that it will be responsible for any usage or implementation fees owed SLC as part of the project? There have been discussions about the possibility of SLI usage fees on educational agencies, vendors or both.
- What are the long-term data hosting options, and therefore the data access and security expectations? No plan has been announced past the pilot phase that provides for a single, multi-state data hosting service.

On behalf of the Software & Information Industry Association (SIIA), I appreciate the opportunity to comment on the NYSED's pending EDP RFPs. SIIA supports the project's goals to harness data to drive curricular and instructional decisions that best meet each student's unique, personalized learning needs. We ask that you respond to the request above to better clarify the expected integration of RFP responses with the SLI and address related long-term questions. We look forward to ongoing dialogue on these and related issues to help ensure the software and digital learning sector can best meet the needs of NYSED and its local schools, educators and students, including by ensuring a fair and competitive procurement process that supports an innovative environment. Please do not hesitate to contact me with any further questions or requests at marks@siia.net or 202-789-4444.

Sincerely,



Mark Schneiderman
Senior Director of Education Policy
Software & Information Industry Association

cc: Ken Slentz, NYSED
Larry Paska, NYSED