



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

JAN 08 2009

The Honorable Deborah A. Gist
State Superintendent for Education
District of Columbia Public Schools
441 4th Street, NW
Washington, DC 20001

Dear Superintendent Gist:

Thank you for submitting a proposal for the U.S. Department of Education's (Department) growth model pilot program. I greatly appreciate the work you and your staff have done to participate in this effort. The Department believes that incorporating student growth into accountability systems can provide a fair, reliable, and innovative method for holding schools accountable for ensuring that all students reach proficiency in reading and mathematics by 2013–14. This letter is to inform you of the Department's decision regarding your current growth model proposal.

As you know, a panel of peer experts reviewed the District of Columbia's growth model proposal on December 2–3, 2008. The District of Columbia model intrigued peers with its innovative design to average student probabilities of attaining proficiency within one year. However, the peers expressed concern that an increase in the likelihood of proficient students scoring proficient or above might compensate for a lack of growth among non-proficient students. Since the model averages probabilities across all students (i.e., those projected to be proficient and those projected not to be proficient), an increase among students currently proficient or above could compensate for a lack of growth among students currently non-proficient, thus leading to a school making adequate yearly progress (AYP) even though it has not improved the performance of non-proficient students. For further details, I am enclosing a copy of the peer report.

Based on the significance of the peers' concern and because the District of Columbia has not demonstrated that its reading/language arts and mathematics assessments fully comply with all statutory and regulatory requirements, the Department has decided not to approve the District of Columbia's proposal for implementation in the 2008–09 school year. However, the Department's Title I regulations issued in October include requirements for states who want to include a growth model in making AYP determinations. Consequently, I expect the District of Columbia will have future opportunities to implement a growth model. More information on the process for submitting requests to implement growth models in making AYP determinations will be forthcoming. I urge you to consider carefully the peer reviewers' feedback as you work to refine your growth model in the future. If you have any questions or would like to discuss further the peers' comments, please contact Patrick Rooney (Patrick.Rooney@ed.gov).

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The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

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Again, I appreciate your interest in the growth model pilot program and your continued efforts to ensure quality education for all children.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kerri Briggs". The signature is fluid and cursive, with a prominent initial "K" and "B".

Kerri Briggs, Ph.D.

Enclosure

cc: Mayor Adrian Fenty
Bill Caritj

**PEER REVIEW
GROWTH MODEL**
U. S. Department of Education
December 2-3, 2008

PEER REPORT – DISTRICT OF COLUMBIA

PEER GROUP RECOMMENDATIONS

Recommend to Accept	Recommend to Accept with Conditions (Outlined below)	Not Recommended to Accept
0	1	5

*1 peer abstained from the review of DC due to a potential conflict of interest.

Conditions:

OVERALL RECOMMENDATION:

Comments to Support Overall Recommendation

The majority of peers recommended not to accept this proposal; however, the peers recognized and appreciated the efforts of the District of Columbia Department of Education to develop and implement a new approach for growth models in NCLB.

DC's ability to track, match, and complete the models with the new data system and software received high praise from the peers. The peers also recognized the model's rigor as reflected by the application of the next year's AMOs to growth determinations and the expectation that all students would meet proficiency in the transitional grades, rather than getting credit in those transition grades for being predicted to be proficient in the following year.

The peers also championed DC's commitment and strategies to identify consistent systems and approaches to evaluate the effectiveness of its schools, development of appropriate interventions, sanctions and more importantly recognitions for success.

The peers recognized the methodological approaches as statistically and methodologically sound, well developed, and appreciated the excellent overview by Dr. Doran. However, concern was expressed regarding the extension of the theoretical model to the formal application in a school system. More specifically, the peers identified the mathematical potential for the proposed scoring procedure to be a compensatory model, with higher performing students compensating for lower performing students.

The peers requested additional clarification. A response was provided by DC using 10 students to demonstrate a conservative approach to the scoring method that caused concern by the peers in regard to their growth model. And although this model demonstrates a conservative approach, it can also be used to demonstrate concerns expressed by the peers regarding potential to be a

compensatory process. For example, in the model using students with probabilities of .65, .78, .85, .32, .43, .21, .27, .51, .0078, and .59, with an AMO of .50, this school does not meet this target with an aggregate of .46. It should be noted that 50 percent of the students in this example are proficient with a .50 performance goal (as identified in example). If next year the AMO and performance goal move to .55, but only students in the present year example improve to .80, .93, 1.00, .80, and .80, with the student who were not proficient in the current year “static” in their performance, i.e., remain at .32, .43, .21, .27, and .0078, the sum is 5.57 and above the performance goal. Further, they meet the AMO, but did not improve the performance of lower performing students, and thus this model has the mathematical potential to be compensatory. The peers recognized the limited probability of the present example, but nonetheless also recognized the mathematical potential for the scoring model to be compensatory, especially at the margins defining the AMO.

Such a compensatory model based on the averaging on individual student probabilities is in opposition to the bright line principles articulated by the Secretary and reiterated in the May 17, 2006 cross-cutting document from the first peer review. Thus, the majority of peers voted to disapprove the proposal.

Dissenting Comments

One peer voted to conditionally approve the proposal for one year at which time DC would be required to submit data for the first year and allow USDOE to review the statistical appropriateness of the model in order to determine whether a model that does not assign more than 1 to any student might diminish the compensatory nature of the model.

However, the peer who voted to conditionally approve the proposal also suggested a revision in the model to convert individual probability to a “yes” or “no” predicted proficiency status and then calculating the percent proficient compared to the AMO. In this peer’s opinion, the model would no longer be compensatory.

PEER COMMENTS – SPECIFIC SECTIONS OF PROPOSAL

CORE PRINCIPLE 1. 100% PROFICIENCY BY 2014 AND INCORPORATING DECISIONS SCHOOL ACCOUNTABILITY

Specific Comments Regarding State Proposal	Supporting Evidence
1. Met criteria	
Summary Statement	

CORE PRINCIPLE 2. ESTABLISHING APPROPRIATE GROWTH TARGETS

Specific Comments Regarding State Proposal	Supporting Evidence
1. Did not meet all criteria, see comments above.	
Summary Statement	

CORE PRINCIPLE 3. ACCOUNTABILITY, SEPARATE FOR READING AND MATH

Specific Comments Regarding State Proposal	Supporting Evidence
1. Met criteria	
Summary Statement	

CORE PRINCIPLE 4. INCLUSION OF ALL STUDENTS

Specific Comments Regarding State Proposal	Supporting Evidence
1. Met criteria	
Summary Statement	

CORE PRINCIPLE 5. STATE ASSESSMENT SYSTEM AND METHODOLOGY

Specific Comments Regarding State Proposal	Supporting Evidence
1. Questions, associated with Principal 2, see above for comments	
Summary Statement	

CORE PRINCIPLE 6. TRACKING STUDENT PROGRESS

Specific Comments Regarding State Proposal	Supporting Evidence
1. Met criteria, but with reservations, see comments above.	
Summary Statement	

CORE PRINCIPLE 7. PARTICIPATION RATES AND ADDITIONAL ACADEMIC INDICATOR

Specific Comments Regarding State Proposal	Supporting Evidence
1. Met criteria	
Summary Statement	