



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

The Honorable Wayne G. Sanstead
State Superintendent
North Dakota Department of Public Instruction
600 East Boulevard Avenue
Bismark, ND 58505-0440

JAN 08 2009

Dear Superintendent Sanstead:

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 growth model proposal.

As you know, a panel of peer experts reviewed North Dakota's growth model proposal on December 2-3, 2008. During this review, the peers identified strengths and raised a number of substantive concerns with the structure of North Dakota's model. The peers were particularly impressed with the model's inclusion of students with disabilities who participate in alternate assessments based on both alternate and modified achievement standards. However, the peers expressed concern regarding the application of the growth model in addition to the current accountability system, which includes numerous steps, and the proposed growth model repeating each of these existing steps. Further, the application of a confidence interval in the growth model and the general lack of specificity for certain elements of the model (e.g., establishing of growth targets, decision rules for students who regress or may be retained, matching process) concerned peers as well. For further details, I am enclosing a copy of the peer report.

Based on the significance of the peers' concerns, the Department has decided not to approve North Dakota'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 North Dakota 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).

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".

Kerri Briggs, Ph.D.

Enclosure

cc: Governor John Hoeven
Greg Gallagher
Laurie Matzke

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

PEER REPORT – NORTH DAKOTA

PEER GROUP RECOMMENDATIONS

Recommend to Accept	Recommend to Accept with Conditions (Outlined below)	Not Recommended to Accept
0	0	7

Conditions:

OVERALL RECOMMENDATION:

Comments to Support Overall Recommendation

Overall, the committee was concerned about the lack of specificity regarding the current state system and infrastructure for implementing its growth model at this time.

The committee believes that there are two major issues with the proposed growth model:

First, the committee has an issue with how growth will be incorporated into an existing AYP model that has 5 tiers with multiple decision points and confidence intervals (see Table 2.2 of proposal). The proposal calls for repeating all steps for determining AYP under status with the growth values. This includes applying the confidence intervals, safe harbor, etc.

The committee believes this is not warranted.

Second, the committee does not support the use of a confidence interval with the growth model and believes that the state did not provide a compelling rationale for why a CI should be applied.

Also, the proposal is lacking specifics regarding how growth targets will be established and the committee is concerned about current match rates for low performing students. There is also concern about the decision rules for addressing how students who regress will be treated in the model as well as students who may be retained, as well as at other important transition points.

The committee commends the state for proposing to include students with disabilities who will participate in the alternate assessments based on both alternate and modified achievement standards; however, how this will be accomplished is not specified.

Dissenting Comments:

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
<p>1.State proposes establishing growth to standard model as the 6th tier of it s accountability...the first 5 tiers use current yr achievement with reliability test6, two years with reliability test, 3 yrs with reliability safe harbor, review of targeted Title 1 following the above..then growth in 3-8 and 11</p> <p>2. 12 member committee (SALT) steering committee</p> <p>3. Uses five steps, growth would be a sixth, including a targeted Title I students, again with multiple years; Use multiple years in growth to standards model</p> <p>4.Use a min N of 10</p> <p>5. AYP determinations are not done within the agency</p>	<p>Pg. 6</p> <p>Pg. 14, Pg. 19</p> <p>Pg. 10</p>
Summary Statement	

CORE PRINCIPLE 2. ESTABLISHING APPROPRIATE GROWTH TARGETS

Specific Comments Regarding State Proposal	Supporting Evidence
<p>1. the targets are based on 3 year projections</p> <p>2.number of schools not meeting AYP on the other calculations moves from 169 to 133 (21.3%)..impact is greater in rdg than math</p> <p>3. 3.-is a projection model using data from the state regular assessment and the alternate assessment to project in reading and math from grades 3-11..will be based on 2 yrs scores but will increase to 3 yrs in future..subtracts previous year's scale score from current yr scale score..if difference is equal or greater to one third the distance to proficiency cut score</p>	

in 3 yrs the student is consider proficient..if less than one=third student's achievement level is unaltered...uses actual data..students must demonstrate one third the distance to the target. The state will interpolate proficiency cut scores in the non=tested years to keep a 3 yr target for students in grades 6 and 7. Proposes to use 99% CI to these targets..argues that this is consistent with the status determinations and needs to remain..not supported mathematically. P.33 provides comparison of 3 growth to standard scenarios using no CI and different CIs

Summary Statement

CORE PRINCIPLE 3. ACCOUNTABILITY, SEPARATE FOR READING AND MATH

Specific Comments Regarding State Proposal	Supporting Evidence
1. yes	
Summary Statement	

CORE PRINCIPLE 4. INCLUSION OF ALL STUDENTS

Specific Comments Regarding State Proposal	Supporting Evidence
1.will incorporate the alternate assessment. 2.match rates are from 83% to mid 90's except for migrant and "other ethnicity" which are in the 60's..but process is not described.	
Summary Statement	

CORE PRINCIPLE 5. STATE ASSESSMENT SYSTEM AND METHODOLOGY

Specific Comments Regarding State Proposal	Supporting Evidence
1.there is no real evidence..the state asserts that they have the capability is there 2. Fully approved in 2007	

3. No annual resetting of the three year projection given the baseline year's value; Grades in 9 and 10 targets are interpolated ; missing data points in baseline, students are removed, individual growth targets using 99% confidence interval

Summary Statement

CORE PRINCIPLE 6. TRACKING STUDENT PROGRESS

Specific Comments Regarding State Proposal	Supporting Evidence
<p>1. match rates are reasonable but process is not described</p> <p>2. data system has been operational since 2005; no information regarding DW or exact approach used to verify multi-wave data within the system necessary to support proposal</p>	<p>Pg. 11</p>
Summary Statement	

CORE PRINCIPLE 7. PARTICIPATION RATES AND ADDITIONAL ACADEMIC INDICATOR

Specific Comments Regarding State Proposal	Supporting Evidence
<p>1. Assurance that additional indicators are included.</p>	
Summary Statement	