



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

DEC 9 2010

Honorable Denise Juneau
Superintendent of Public Instruction
Montana Office of Public Instruction
1227 11th Avenue
Helena, Montana 59620-2501

Dear Superintendent Juneau:

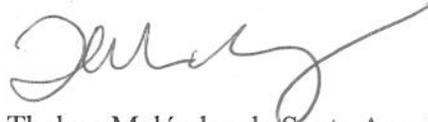
Thank you for submitting assessment materials for peer review under the standards and assessment requirements of the *Elementary and Secondary Education Act of 1965* (ESEA), as amended. We appreciate the efforts that were required to prepare for the peer review that occurred in May 2009.

In a letter to you on November 29, 2007, we approved your standards and assessment system, including reading/language arts and mathematics. However, since that time, you implemented Montana's science assessments, evidence of which you were obligated to submit for peer review. Outside peer reviewers and Department staff have evaluated Montana's submission. I have determined that, based on the evidence reviewed to date, Montana's science standards and assessments are not fully compliant with the applicable statutory and regulatory requirements. Due to the nature of the remaining requirements, however, I believe that all outstanding requirements can be completed and submitted for peer review within a year. Accordingly, Montana's standards and assessment system is now designated *In Process*. To obtain full approval of its standards and assessments, Montana must submit additional documentation to address the requirements related to its science assessments that it has not yet met. A complete list of evidence needed for Montana's standards and assessment systems to be granted full approval is enclosed with this letter. In addition, I have enclosed detailed comments from the peer review team that evaluated Montana's submission which I hope will help you in gathering the additional required evidence.

Because certain significant elements of Montana's standards and assessment system are not yet complete, a condition will remain on Montana's Title I, Part A grant award until Montana submits the outstanding evidence and receives full approval of its standards and assessment system. Also, Montana must provide a timeline for the completion of additional evidence listed in the letter that shows these requirements will be completed prior to the next administration date of the assessments. Please note that, if it becomes evident that Montana did not implement a fully compliant standards and assessment system in the 2010-11 school year, the Department will change the status of Montana's standards and assessment system to *Approval Pending*.

I appreciate the steps Montana has taken toward meeting the requirements of the ESEA, and I know you are eager to receive full approval of your standards and assessment system. We are committed to helping you accomplish that goal and remain available to provide technical assistance. We will schedule peer reviews for the spring of 2011, or earlier if you have evidence available, to evaluate the remaining elements of your system. If you have any questions or would like to discuss this further, please do not hesitate to contact Collette Roney of my staff at Collette.Roney@ed.gov and (202) 401-5245.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thelma', with a long, sweeping flourish extending to the right.

Thelma Meléndez de Santa Ana, Ph.D.

Enclosures

cc: Judy Snow

SUMMARY OF ADDITIONAL EVIDENCE THAT MONTANA MUST SUBMIT TO MEET ESEA REQUIREMENTS FOR MONTANA'S STANDARDS AND ASSESSMENT SYSTEM

2.0 – ACADEMIC ACHIEVEMENT STANDARDS

1. Clarification of which set of performance level descriptors is used for reporting student performance on the CRT-Alternate. (2.3)
2. Documentation of the involvement of diverse stakeholders in the development of academic achievement standards in science for the CRT and CRT-Alternate. (2.6)

4.0 – TECHNICAL QUALITY

1. The following additional evidence of validity for the CRT and CRT-Alternate: Documentation that the State has specified the purposes of the assessments, delineating the types of uses and decisions most appropriate to each; evidence or a plan and a timeline for producing evidence that test and item scores are related to outside variables as intended; evidence that decisions based on the results of its assessments are consistent with the purposes for which the assessments were designed; and evidence or a plan and a timeline for producing evidence of whether the assessment produces intended and unintended consequences. (4.1(a), 4.1(e), 4.1(f), 4.1(g))
2. Evidence of the reliability of teacher scoring of the CRT-Alt and evidence that the reliability information demonstrates a high level of consistency in scoring. (4.2(c))
3. Additional evidence that accommodations for students with disabilities and limited English proficient (LEP) students yield meaningful scores. (4.3 and 4.6)
4. Evidence that the uses of each accommodation that Montana allows for general education students yield meaningful scores, and evidence that Montana has provided guidance to districts and schools that indicates which accommodations among those identified as standard accommodations in Montana are not appropriate for general education students. (4.3 and 4.6)
5. Documentation of the number of general education students using accommodations by type of accommodation. (4.3 and 4.6)
6. Evidence of steps the State has taken to ensure fairness in the development of the CRT-Alternate (*e.g.*, bias review of items). (4.3(c))
7. Documentation of procedures the State uses to monitor the implementation of accommodations during testing. (4.3(d))
8. Documentation that the State has taken steps to ensure consistency of test forms over time with regard to the impact of changing the standards assessed by constructed-response items from year to year. (4.4(a))

5.0 – ALIGNMENT

1. Evidence of alignment between the CRT-Alternate and the science academic content standards, specifically evidence that the CRT-Alternate and the expanded benchmarks on which it is based provide for adequate progression across grades. (5.1)

2. Evidence that the CRT science assessments and the science content standards are aligned comprehensively, measure the depth of knowledge of the content standards, are aligned in terms of both content and process, and reflect the same degree and pattern of emphasis as the academic content standards unless a justification for any variation is provided. (5.2, 5.3 & 5.4)
3. Description and timeline for the ongoing procedures that Montana will use to improve and maintain alignment between the CRT assessments and standards over time, including actions implemented to address deficiencies in alignment identified in the alignment study for the CRT. (5.7)

6.0 – INCLUSION

1. Evidence that Montana provides IEP Teams with a clear explanation of any effects of State and district policies on a student's education resulting from taking an alternate assessment based on alternate academic achievement standards and that parents are informed when their child's achievement will be based on alternate academic achievement standards and of any possible consequences resulting from State or district policies (*e.g.*, ineligibility for a regular high school diploma). (6.2.2(c), (d))
2. Documentation of policies and practices the State has in place to ensure the identification and inclusion of migrant and other mobile students in the tested grades in the assessment system. (6.4)

7.0 – REPORTS

1. Revised individual student reports or additional interpretive guidance for these reports that provide clearer information for parents, teachers and principals to help them understand and address a student's specific academic needs (*e.g.*, clear labels and website references, interpretive cautions, subject-specific performance level descriptors). (7.3)
2. Evidence of the State's procedures and timeline for ensuring that individual student reports are delivered to parents, teachers, and principals as soon as possible after the assessment is administered. (7.3)