



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

NOV 09 2006

THE ASSISTANT SECRETARY

The Honorable Roger Sampson
Commissioner of Education
Alaska Department of Education & Early Development
Goldbelt Place
801 West Tenth Street, Suite 200
Juneau, Alaska 99801-1894

Dear Commissioner Sampson:

Thank you for submitting a proposal for the U.S. Department of Education's (Department) growth-based accountability model pilot project. I appreciate the work you and your staff have done to participate in this effort so far. The Department continues to believe that this pilot project can help determine whether growth models will, most importantly, ensure that all students reach grade-level standards in reading and mathematics by 2013-14 and also whether these models represent a fair, reliable, and innovative way to hold schools accountable.

As you know, the Department submitted the Alaska proposal to a group of peer reviewers who evaluated Alaska's proposal on October 16, 2006. Based on peer input, we have determined that the Alaska proposal cannot currently be approved without significant revisions. However, with this letter, I am inviting Alaska to consider this feedback and submit a revised proposal by December 1, 2006. This revised proposal will be submitted for peer review, along with other State proposals submitted on November 1. If successful, Alaska's revised growth model could be approved for implementation for the 2006-07 school year, subject to the limit of 10 approved State growth models. To help you with this effort, I am enclosing the peer report for Alaska. My staff and I are willing to discuss this information with you to help refine the proposal.

While reviewing Alaska and the other State proposals, the peers raised several general concerns about the appropriateness of wide confidence intervals (e.g., 95 or 99 percent) in a growth model. Because a growth model is measuring the gains over time of individual students, it does not need to account for volatility due to changes in cohorts, such as may be the case with standard adequate yearly progress determinations. The Alaska growth model proposal included a confidence interval of 99 percent, which was outside the range of appropriate confidence intervals suggested by the peers and was not sufficiently justified.

In addition to this general concern, the peers raised significant specific concerns regarding the Alaska proposal (please refer to the included peer report for details). The peers believed that the Alaska assessment system, while adequate for the "status" determination of adequate yearly progress, could not support the type of growth model proposed. Although the Alaska proposal stated that Alaska's standards are vertically coherent, the technical manual for the assessment, included as an attachment to the growth model proposal, states that "the scale scores associated with the standards based assessments are not vertically equated. Therefore, interpretation of the individual score differences between the assessments is not appropriate. Because the scale scores are established independently by grade/subject combination, a comparison of scale scores between subjects is also inappropriate" (*Spring 2005 Alaska Standards Based Assessments (SBAs) Operational and Field Test Technical Report*, page 55). Given Alaska's model's reliance

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on scale scores to measure growth over time, the peers felt that the assessment system would not be able to support the type of student growth model proposed by Alaska.

The peers also expressed concern that growth measures were included in the calculation of safe harbor. Alaska's proposal included the students on track to be proficient as part of the decrease in the percentage of students who score below proficient for the safe harbor calculation. In addition, the Alaska model only applies growth calculations to students who are not proficient; as a result, the model effectively ignores students who are currently proficient but whose growth estimates put them at risk for becoming non-proficient. These and additional concerns are presented in the peer report that is attached.

The Department will rigorously evaluate the approved proposals, review information on how the pilot project is working, and share the results with other States, policymakers, and the public. With the knowledge gained from the approved growth models, the Department will be able to make an informed decision about whether to expand the pilot project in the future. Again, I appreciate your interest in the growth model pilot project and your continued efforts to ensure quality education for all children.

Sincerely,



Henry L. Johnson

Enclosure

cc: Governor Frank Murkowski
Les Morse