



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

OCT 29 2008

The Honorable Robert Scott  
Commissioner  
Texas Education Agency  
1701 North Congress  
Austin, Texas 78701

Dear Commissioner Scott:

Thank you for submitting a proposal for consideration to participate in the Secretary's growth model pilot, which would enable Texas to implement a growth-based accountability model for the 2008–09 school year to meet the goals of the No Child Left Behind Act (NCLB). Each proposal is being reviewed internally to determine how well it meets the seven core principles laid out in the Secretary's letter on November 21, 2005, making it eligible to advance to peer review.

An initial review of Texas' proposal indicates that some additional information is needed to determine how it meets the seven core principles. Please provide information to answer the following questions found in the Department's peer review guidance (please see [www.ed.gov/policy/elsec/guid/growthmodelguidance.doc](http://www.ed.gov/policy/elsec/guid/growthmodelguidance.doc) for that information). The reference in parenthesis is to the particular element in the guidance document.

Principle 1. Universal proficiency

- Has the state proposed technically and educationally sound criteria for “growth targets” for schools and subgroups? (Principle 1.2)
  - Has the state adequately described the rules and procedures for establishing and calculating “growth targets”? (Principle 1.2.2)
    - How does the state plan to establish growth targets between grades 8 and 11 and does the assessment system support such an approach?
    - Please provide additional information to support the model description on pages 11-12 and in table 5 of the proposal that a one-year model is as accurate as a model using multiple years of data. Specifically, please provide any available information on the reliability of the Texas model to accurately predict scores two and three years out compared to the more complex model. What are the reliabilities for all relevant subgroups?
- Has the state proposed a technically and educationally sound method of making annual judgments about school performance using growth? (Principle 1.3)
  - Has the state adequately described how annual accountability determinations will incorporate student growth? (Principle 1.3.1)
    - Please clarify whether Texas intends to apply a confidence interval to the growth model calculations for small schools, as noted on page 18. Please

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note that the Department has not approved the application of a confidence interval with the growth model in any state that has been approved to include a growth model in its accountability system.

#### Principle 2. Establishing appropriate growth model targets at the student level

- Has the state proposed a technically and educationally sound method of depicting annual student growth in relation to growth targets? (Principle 2.1)
  - Has the state adequately described a sound method of determining student growth over time? (Principle 2.1.1)
    - Please provide additional evidence that the assessment system is stable enough to use prior year scores as predictors for the growth model, as explained on pages 27-28.
    - Please provide additional documentation of the accuracy of growth projections two and three years out when the model uses only one year of data.
    - Please indicate whether the proposed growth model includes any predictor variables other than a student's reading and mathematics score and the campus-level mean scores for reading and mathematics.

#### Principle 4. Inclusion of all students

- Does the state's growth model address the inclusion of all students, subgroups, and schools appropriately? (Principle 4.1)
  - Does the state's growth model address the inclusion of all students appropriately? (Principle 4.1.1)
    - Please clarify how growth model data will be attributed for AYP purposes when a student moves from one school to another or one district to another.
    - Please provide evidence for the percentage of students, by subgroup, that have two assessment scores in the current year; please explain how Texas will mitigate against any possible bias in the model.

#### Principle 5. State assessment system and methodology

- How will the state report individual student growth to parents? (Principle 5.2)
  - How will an individual student's academic status be reported to his or her parents in any given year? What information will be provided about academic growth to parents? Will the student's status compared to the state's academic achievement standards also be reported? (Principle 5.2.1)
    - Please provide additional information about how growth will be reported to parents and the public.
- Does the statewide assessment system produce comparable information on each student as he/she moves from one grade level to the next? (Principle 5.3)
  - If the State uses a variety of end-of-course tests to count as the high school level NCLB test, how would the State ensure that comparable results are obtained across tests? (Principle 5.3.2)
    - Please provide further rationale for why students taking the general assessment in different languages across years cannot be included in the growth model calculations. How will such students be included in the growth

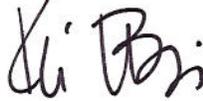
model? (i.e., will the student be considered “not making growth” for the purposes of the model or removed from the calculation altogether?)

- Please provide further information about the various tests used in the Texas assessment system, particularly distinctions between the TAKS and the TAKS (Accommodated).

I hope you will consider the suggestions provided in this letter and submit a revised proposal. The additional information you provide will be considered an addendum to Texas’ October 15 submission and will be included in the review process for this pilot. The information should be submitted no later than November 12, 2008. Please provide the information to Patrick Rooney ([Patrick.Rooney@ed.gov](mailto:Patrick.Rooney@ed.gov)).

I appreciate your interest in the growth model pilot. If you have any questions regarding this request, please contact Patrick Rooney at the email address above or by calling (202) 205-8831.

Sincerely,



Kerri L. Briggs, Ph.D.

cc: Governor Rick Perry  
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