APR 5 2007

The Honorable Keith Rheault
Superintendent of Public Instruction
Nevada Department of Education
700 East 5th Street
Carson City, Nevada 89701-5096

Dear Superintendent Rheault:

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 provide a fair, reliable, and innovative mechanism for holding schools accountable for ensuring that all students reach grade-level proficiency in reading and mathematics by 2013–14.

As you know, the panel of peer experts reviewed Nevada's growth model on March 15-16, 2007. During this review, the peers raised a number of substantive concerns with the structure of Nevada's model. I am enclosing a copy of the peer report for your consideration. Based on the significance of the peers' concerns, the Department has decided not to approve Nevada's proposal for implementation in the 2006–07 school year. I anticipate, however, that there will be other opportunities for Nevada to implement a growth model in the future. As noted in the *Building on Results: A Blueprint for Strengthening the No Child Left Behind Act,* the Department's reauthorization proposal would permit States to include a growth model to measure adequate yearly progress, provided the model is approved by the Department. I urge you to consider carefully the peer reviewers' feedback as you work to refine your growth model for the future. My staff and I are willing to discuss the peer's concerns with you to help refine your model.
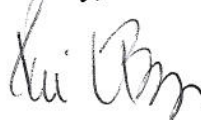
The peers identified several strengths in the Nevada proposal, noting the approach would be easily understood by the public and professional educators and fully transparent. The peers commended Nevada's commitment to the measurement of academic growth as evidenced by the efforts undertaken by the Nevada Department of Education to involve the education community in the development of the proposed growth model. The peers also noted that Nevada's work to begin collecting longitudinal test data on successive cohorts of students could be used for further development and evaluation of a growth model system.

However, the peers noted specific concerns with several fundamental components of Nevada's proposed model. While believing a value table is one possible approach to a

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successful growth model, the peers did not feel that Nevada's value table, as presently constituted, properly accounts for student growth. The peers were particularly concerned about inconsistencies in the proposed value table where, in some cases, larger amounts of growth are awarded fewer value points than smaller amounts of growth. In addition, providing additional value points for achievement above proficiency would mask the lack of growth of low-achieving students. As a result, the growth model proposal did not support the goal of ensuring all students reach grade-level standards in reading and mathematics by 2013–14. In addition, Nevada did not provide a sufficient explanation for its decision to exclude students with the most significant cognitive disabilities taking an alternate assessment based on alternate achievement standards from the growth model determinations. The peers also noted concerns regarding Nevada's data system to track students across schools and over time. (Please refer to the enclosed peer report for details.)

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

Sincerely,

Kerri L. Briggs, Ph.D.
Acting Assistant Secretary

Enclosure

cc: Governor Jim Gibbons
        Paul LaMarca

PEER REVIEW
NCLB GROWTH MODEL PILOT
U. S. Department of Education
March 15-16, 2007

PEER REPORT

State: Nevada

Clarifying Call to State
No call necessary
Questions and responses (please note within each question if the State will provide additional information) [X]
1.

(Does not apply)

Overall Recommendation

Recommend to Accept	Recommend to Accept with Conditions	Recommend to Resubmit	Recommend not to Accept
0	0	0	16

<u>Comments to support recommendation:</u>

The Peer Reviewers unanimously recommended not to accept the Nevada growth proposal. In summary, the Reviewers were concerned about the complexity of the proposed methodology, the lack of experience with the comprehensive assessment program, the criteria defined in the values tables, and the inability to include all students with disabilities in the system (i.e., those in the alternate assessment). Assuming that the state wishes to revise its proposal, the following general recommendations are made.

Since the idea of growth models in the context of AYP decisions under NCLB is relatively new, and often the procedures proposed are complex and may be untested, the panel is concerned about the prediction validity of the system proposed. We would like your resubmission to include the following:

1. Please provide in one place in the proposal all of the necessary rules, procedures, statistical models and estimation procedures (if you are employing a statistical model), AMO information and so on required to operationalize your proposed system. The detail should be sufficient such that an independent third party could, in principle, build a system that reproduces your AYP growth results. It should describe how all children will be handled including: those that change schools; change LEAs; are retained in grade; transition for one school type to another (e.g. elementary to high school); and who participate in alternate assessments or with the use of accommodations. A resubmitted proposal that does not meet this standard will be considered unacceptable. Provide multiple illustrations/simulations of how individual students beginning at different test levels and grades, and progressing at different rates over time would be judged under this system. These examples should be chosen to illustrate a diverse range of the data patterns that might occur AND SHOULD FOLLOW THE SAME STUDENT OVER TIME.

2. Additionally, the simulations should include students whose scores may be treated differently under the proposed model (i.e., retained students, students with missing scores, and students who participated in an alternate assessment). Please detail if there are cases where scores for some groups of students might be treated differently in the model or in an alternative growth model.

3. Provide an assurance to the Peer Review Panel that you have carefully considered the overall prediction validity of your system. That is, the growth accountability option involves making predictions, based on children's past academic growth, about the likelihood that children will in fact achieve proficiency at some future time point. We are particularly concerned about the possibility that the system might over predict subsequent proficiency rates in very low achieving schools. We would appreciate any information that you can provide that addresses this concern. If some extant prior years' data permit, you could apply the system detailed under one above to student results, say in 2004, to make predictions about status attainment, to say in 2006, and then compare the prediction to the actual status attained. An unbiased system would not result in systematic discrepancies between predictions and actual attainments.

4. Some members of the panel were particularly concerned about growth model formulas that do not take into account the possibility that some students who may be judged proficient in the current year may regress below that threshold in subsequent years. If growth projections are not made for "currently proficient students" how does your system take this consideration into account? (This consideration is especially relevant to the issue of prediction validity noted under three above.)

5. Please indicate if there are any sub-groups of students for which you will be unable to apply your prediction model in 2006-2007. Note an acceptable growth proposal must detail a strategy that includes predictions for all students tested in 2006-07. To be successful your resubmission must address all subgroups.

An additional peer comment:

(Use additional space as necessary)

Specific Strengths in the Proposal

Using your notes from the Peer Review Guidance, please note areas where the proposal was especially strong, ingenious, high quality, or exceeded the Peer Review criteria. Please cite specific aspects of the proposal and include references to the Peer Review Guidance criteria (e.g., B.1.2.1) and the proposal (e.g., page numbers).

1. Nevada is committed to the measurement of academic growth as evidenced by the efforts undertaken by the State Department of Education to involve the educational community in the creation of the proposed system.

2. Nevada proposes use of an index system rather than one based on a regression or HLM model. Such an approach has the advantage of having good transparency and understandability with lay and professional education audiences.

3. Nevada has implemented a statewide assessment program in all grades required by NCLB and has begun collecting longitudinal test data on successive cohorts of students. These data can form the basis for further development and evaluation of any proposed growth model.

4. Nevada has implemented a student identification numbering system and a data warehouse capability.

5. Nevada has made an initial attempt to create a values table that defines growth expectations. The current values table was developed with the extensive involvement of the educational community.

6. Nevada has plans to incorporate growth measures in its student and school level assessment reports.

Dissenting comments:

(Use additional space as necessary)

Specific Weaknesses in the Proposal

Using your notes from the Peer Review Guidance, please note areas where the proposal was unclear, incomplete, or did not meet the Peer Review criteria. Please cite specific aspects of the proposal and include references to the Peer Review Guidance criteria (e.g., B.1.2.1) and the proposal (e.g., page numbers).

The proposed model is complex. The development of the values table through involvement of standard-setting committees is not clear. The proposed values are inconsistent. (For example, in some cases, greater amounts of growth are awarded fewer points than lesser amounts of growth.) The performance of high-achieving students can mask the performance of low-achieving students. The NCLB system is oriented toward attaining Proficiency. A school should not be given additional credit because of students who are above that level.

The State should consider an approach other than the value table *as it has been proposed*. The current plan is based upon values defined by committees, but it is not clear the basis upon which the individual committee members were making their decisions and recommendations. The derivation of values in this application appears to be quite different from the ordinary way in which cut-scores are created for an assessment test where participants can "anchor" their judgments in terms of specific test items (i.e., the "bookmark" procedure). As an alternative, Nevada could consider an approach based on probabilities to create growth targets.

The value table appears to place higher value on "exceeding" proficiency than in "meeting" proficiency.

The State does not provide a sufficient explanation for its decision to exclude students who are taking alternate assessments even though these students' performance apparently can participate in the calculation of Safe Harbor.

The proposed model does not provide for 100% proficiency by 2013-14 and merely states that it will be more rigorous than the existing Safe Harbor provisions.

Imputation of missing scores is problematic, particularly because the student will be automatically assigned the lowest possible performance classification. Such students will be highly likely to demonstrate growth the following year simply by taking the test and scoring any level above the lowest level.

The proposed use of a confidence interval is problematic and should not be proposed.

The proposal does not adequately address the consequences for schools that under-perform and what alternative support services the State will provide.

The State has little experience with the implementation of the statewide assessment at all grades 3–8 and high school, and it will not have growth data from "live" tests until the spring 2007. The proposal could be improved with analyses of real data across the relevant grades and subgroups so that the consequences of the procedures and criteria can be better understood. This also would permit greater understanding of the success of the student ID and matching system. The current proposal did not discuss the degree of success attained with the task of matching student ID numbers within the various population subgroups.

The student ID system does not appear to adequately control for students who leave the public school system (or the state) and who may re-appear at a later time with a different ID number.

Dissenting comments:

(Use additional space as necessary)