



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

MAY 17 2006

The Honorable Tom Horne  
Superintendent of Public Instruction  
Arizona Department of Education  
1535 W. Jefferson Street, Bin 2  
Phoenix, AZ 85007

Dear Superintendent Horne:

Thank you for submitting a proposal for the U.S. Department of Education's (Department) growth-based accountability model pilot project. I realize that our timelines were tight and sometimes inconvenient; 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 will represent a fair, reliable, and innovative method for holding schools accountable.

As you know, the Department determined that Arizona's growth model proposal seemed poised to meet the seven core principles outlined by Secretary Spellings in her letter on November 21, 2005, and was forwarded to a group of peer reviewers who met on April 17–18, 2006. The peer reviewers indicated that the Arizona model was acceptable provided several changes were made. However, the Secretary's announcement made clear that approval of a growth model for the pilot would also be contingent upon meeting several "bright line" principles. As part of the Department's Title I monitoring program conducted last year, the Department issued a monitoring report with a finding that Arizona approves the appeals of schools that fail to make adequate yearly progress (AYP) based on results from limited English proficient students served less than three years, effectively removing these students' scores from AYP determinations. Since this issue has yet to be resolved, the Department is unable to approve the Arizona model for the pilot this year. Were Arizona to address this concern, the Department would have been able to approve Arizona for the pilot for the 2005–06 school year, as Arizona had already agreed to address the issues raised by peers that were identified as necessary changes required for approval.

To help you with this effort, in addition to the information in this letter, I am providing two pieces of information: 1) the peer report for Arizona; and 2) a document produced by the peer review team that outlines several general themes and cross-cutting concerns raised during the peer review, although not necessarily specific to Arizona's proposal.

My staff and I are willing to discuss this information with you to help refine Arizona's proposal.

The peers identified several strengths in the Arizona proposal – growth is calculated for all students (even though the growth of proficient students is not used in determining AYP), the aggressive timeframe for which students must reach proficiency (3 years or 8th grade, whichever comes sooner), and the fact that the proposal excludes any groups whose match rate is not small in AYP determinations.

That said, the peers also raised specific concerns regarding Arizona's proposal (please refer to the included peer report for details). Again, it is my understanding that Arizona had agreed to address these changes which, based on peer input, were deemed important but not equivalent to writing a new proposal. These concerns include the application of a wide confidence interval. Confidence intervals (e.g., 99 percent) are inappropriate in a growth model. Because a growth model measures 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 AYP determinations. The peers also expressed concern that there were no provisions for including non-proficient students with only one measurement point. In addition, the peers expressed reservations that the model did not include the growth trajectories of proficient students in the determinations of AYP, though the peers noted that growth was calculated for all students. However, the peers were ultimately willing to entertain a model that calculated growth for all students even if growth was not used for proficient students.

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 on whether to expand the pilot project beyond the 2006–07 school year. If Arizona decides to address the monitoring finding regarding the inclusion of limited English proficient students in accountability determinations and the peers' concerns regarding the growth model, the Department would be willing to reconsider Arizona's growth model for the 2006–07 school year. As stated in November 2005, the limit of approved plans through this pilot project will remain at ten.

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

cc: Governor Janet Napolitano  
Robert Franciosi