



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

The Honorable Judy A. Jeffrey
Director of Education
Iowa Department of Education
Grimes State Office Building
East 14th & Grand Streets
Des Moines, Iowa 50319-0146

JAN 15 2009

Dear Director Jeffrey:

I am writing regarding our review of Iowa's science assessments under Title I of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the No Child Left Behind Act of 2001 (NCLB).

As outlined in my letter of February 28, 2008, states had to meet four basic requirements in science for the 2007–08 school year. In particular, each state was required to: (1) have approved content standards in science; (2) administer a regular and alternate science assessment in each of three grade spans; (3) include all students in those assessments; and (4) report the results of the regular and alternate science assessments on state, district, and school report cards.

My staff has reviewed the evidence you submitted and determined that, based on the evidence submitted to date, it appears that Iowa has met the basic requirements for administering science assessments in 2007–08. However, Iowa has not yet submitted data from the spring 2008 science assessment demonstrating that all students were included in the science assessments, nor has Iowa yet submitted state, district, and school level sample science reports or report shells for the general and alternate assessments. Please let us know within 10 days of receipt of this letter when Iowa will have those data and sample science reports or report shells available so that we can confirm that Iowa has, in fact, met the basic requirements for administering science assessments in 2007–08. States that do not provide the outstanding evidence to verify that they have met the four criteria for the 2007–08 school year have not met the basic requirements of the statute and will be subject to consequences, such as withholding of Title I, Part A administrative funds.

In 2008–09, Iowa must provide evidence for peer review that demonstrates full compliance of its science standards and assessments. In anticipation of that required peer review, Iowa chose to participate in an optional technical assistance peer review in May 2008. I appreciate the efforts that were required to prepare for the technical assistance peer review and hope that the process provides useful feedback that will support Iowa's efforts to monitor student progress toward meeting challenging science standards.

Based on the evidence received from Iowa, which was reviewed by the peers and Department staff, we have concluded that Iowa's science standards and assessments do not yet meet all the statutory and regulatory requirements of sections 1111(b)(1) and 1111(b)(3) of the ESEA. Specifically, we have concerns with the academic achievement standards, technical quality, inclusion of all students, assessment reports, and alignment of the science component of the Iowa Tests of Basic Skills (ITBS) at grades 5 and

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8 and the Iowa Tests of Educational Development (ITED) at grade 11 to Iowa's grade-level science content standards, as well as the academic achievement standards, technical quality, and assessment reports for the science component of the Iowa Alternate Assessment (IAA). The complete list of evidence needed to address these concerns is enclosed with this letter. We have scheduled the next peer review for states' science assessments for the week of March 23 through 27, 2009. All materials for review must be provided to the Department three weeks before the scheduled peer review.

Please keep in mind that science assessments represent one piece of a state's complete standards and assessment system, which also includes regular and alternate assessments for reading and mathematics. As stated in my letter to you on November 29, 2006, Iowa's standards and assessment system is currently designated Full Approval. In order to maintain the Full Approval status, Iowa must demonstrate that its general and alternate assessments for science comply with all ESEA requirements for standards and assessment systems as administered in 2008-09.

We look forward to working with Iowa to support a high-quality standards and assessment system, of which science standards and assessments are an integral part. If you would like to discuss this further, please do not hesitate to contact David J. Harmon (David.Harmon@ed.gov) or Abigail Rogers (Abigail.Rogers@ed.gov) of my staff.

Sincerely,



Kerri L. Briggs, Ph.D.

Enclosure

cc: Governor Chet Culver
Kevin Fangman
Paul Cahill
Tom Deeter

SUMMARY OF ADDITIONAL EVIDENCE THAT IOWA MUST SUBMIT TO MEET ESEA REQUIREMENTS FOR SCIENCE STANDARDS AND ASSESSMENTS

2.0 – ACADEMIC ACHIEVEMENT STANDARDS

1. Evidence of formal approval/adoption of academic achievement standards for the ITBS/ITED and the IAA.
2. Evidence of notification to parents of the consequences (if any) of taking the IAA.
3. Score reports showing the number and percent of students with disabilities assessed against alternate achievement standards, and those included in the regular assessment (including those administered with appropriate accommodations).

4.0 – TECHNICAL QUALITY

1. The science standard setting report for the ITBS/ITED including the selection of judges, methodology employed, and final results.
2. A complete IAA technical manual for science including test and item development, rating procedures, test validity, reliability, classification consistency, bias among IAA items, and meaningfulness of IAA scores with and without accommodations.
3. Evidence of ITBS/ITED score consistency with Iowa student scores including reliability, classification consistency, and score generalizability derived from scores of Iowa students. DIF analyses and bias reviews performed with Iowa results are also required.
4. Documentation that the ITBS/ITED academic achievement standards reflect the same knowledge and skills regardless of when the tests are administered (fall, midyear, or spring).
5. Procedures that ensure test security for the ITBS/ITED given the State administration of the same ITBS/ITED test form (A or B) at different times (fall, midyear, or spring) within a single school year.
6. Test study report that evaluates the inferences made from accommodated scores among students with disabilities and evidence that Iowa monitors the implementation of accommodations during testing.

5.0 – ALIGNMENT

1. A plan and timeline for improving the mismatch between the cognitive complexity of the science ITBS/ITED items and cognitive complexity of the Iowa Core Standards and Benchmarks.

6.0 – INCLUSION

1. State participation reports that show all students by grade and subgroup were included in science assessments for 2007-08.

7.0 – ASSESSMENT REPORTS

1. State, district, and school level sample science reports or report shells for the ITBS/ITED and alternate assessments.
2. Summary report that includes the number of students enrolled and the percent that participated in the assessments or the number of students tested/not tested as evidence that all students are tested.
3. Report(s) for science ITBS/ITED and IAA science on participation and assessment results for all students and for each of the required subgroups at the school, district, and State levels.
4. Student-level reports (sent to parents) that provide the achievement levels along with content-based competency descriptors for science.