



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

JAN 08 2009

The Honorable Jim Rex
State Superintendent of Education
South Carolina Department of Education
1006 Rutledge Building
1429 Senate Street
Columbia, South Carolina 29201

Dear Superintendent Rex:

As we approach our seventh year of implementing the accountability provisions of the Elementary and Secondary Education Act, I want to take a moment to thank you and your colleagues for all your hard work to help realize the goals of the *No Child Left Behind Act of 2001* (NCLB), which has led to real and meaningful improvements in student achievement. These outcomes are due, in no small part, to the efforts of the dedicated educators in your state. We have seen an increased attention on high expectations for every child, an improvement in student performance across the board and a decrease in achievement gaps.

As Secretary Spellings is fond of saying, "what gets measured, gets done." With that in mind, I want to take this opportunity to update you on the status of some NCLB cornerstones with respect to South Carolina. Detailed information on specific components of your state's assessment and accountability system is contained in an attachment to this letter.

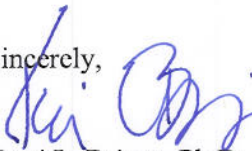
- Assessment system: An assessment system that produces valid and reliable results is fundamental to an accountability system that holds schools and districts accountable for educating all students. Please accept my congratulations on South Carolina's standards and assessment system meeting all statutory and regulatory provisions required for reading/language arts, mathematics, and science as of 2007-08.
- Accountability components: The Department's new Title I regulations provide for greater scrutiny to states' accountability systems, including establishing a uniform and more accurate measure of calculating high school graduation rates that is comparable across states and requiring that states ensure that statistical measures maximize the inclusion of students and student subgroups in accountability determinations. Hence, the regulations also require that all states submit portions of their Accountability Workbook for peer review. In the attachment to this letter you will find information on South Carolina's minimum group size, annual measurable objectives, confidence interval, full academic year definition, and graduation rate.
- Departmental flexibilities: Over the past several years, the Secretary has offered several flexibilities to states, such as growth model and differentiated accountability pilots, assessing students with disabilities, and discretionary grant programs, such as the Teacher Incentive Fund, Enhanced Assessment Grants, and State Longitudinal Data System Grants. I am pleased to note that South Carolina is participating in several of these endeavors.
 - Two percent transition flexibility: South Carolina was approved in 2007-08 to include a proxy calculation for any school or district that did not make AYP due to the students with disabilities subgroup in grades 3-8. South Carolina is eligible for this flexibility because the SEA is developing an alternate assessment based on modified academic achievement standards for students with certain disabilities.

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- In 2006, South Carolina received an Enhanced Assessment Grant of \$1,119,620. South Carolina also received grants in 2005 of \$1,325,076, in 2003 of \$1,016,376, and in 2002 of \$1,719,821.
- In 2006, South Carolina received a Statewide Longitudinal Data System Grant of \$5,795,603.
- General Supervision Enhancement Grantee: South Carolina is working towards the development of an alternate assessment based on modified academic achievement standards. (Year 1: \$298,737; Year 2: \$ 297,990; and Year 3: \$291,982)
- Teacher Incentive Fund Grants:
 - South Carolina Department of Education, Total: \$20,914,321, Year 1: \$7,503,051, Year 2: \$5,965,279, Year 3: \$7,445,991
 - Florence County School District Three, Total: \$2,906,509, Year 1: \$1,950,250, Year 2: \$956,259
- South Carolina-specific issues: Finally, I'd like to take this opportunity to note that South Carolina will be developing new assessments in the next few years. Please do not hesitate to let us know if we can be of assistance in this process.

In addition, for your information, I am enclosing a file that provides information across all states on the current assessment status, participation in flexibilities offered by the Department, AYP information, and discretionary grants. I wish you continued success in raising the achievement in South Carolina. NCLB has focused our attention on closing achievement gaps and increasing the awareness of those students who have often been left behind: economically disadvantaged, limited English proficient, and students with disabilities. I have enjoyed the opportunity to work with you and all your colleagues across the country on such important issues.

Sincerely,



Kerri L. Briggs, Ph.D.

Enclosures

cc: Governor Mark Sanford
Nancy Busbee
Teri Siskind

Assessment System

Your assessment system met the requirements to be considered *Fully Approved with Recommendations*. This means that South Carolina meets requirements for an assessment system that includes assessments in grades 3-8 and high school in reading/language arts and mathematics. I encourage you to consider whether there are any areas in which the Department can provide or facilitate technical assistance to South Carolina in meeting the statutory or regulatory requirements or as you consider changes to your current assessment system.

- South Carolina's science assessments are not yet fully compliant.
 - In 2007–08, the Department required that the state meet four minimal criteria related to the content area of science: have science content standards; have a general and alternate science assessment; include all students in one of the science assessments (i.e., either the general or alternate); and report the results of the science assessments. South Carolina appears to have met these requirements.
 - In 2008–09, the Department will conduct peer reviews of science assessments and expects the assessments to be fully compliant. Beginning with the 2008–09 school year, science assessments will be included in the states' assessment status. For additional detail, please see the enclosed fact sheet. Because South Carolina did not submit evidence of its science assessments for the October 2008 peer review, it must submit evidence for the March 23-27, 2009 peer review. Evidence for this review is due three weeks prior to the review.

Accountability System

- Minimum group size (the state-defined minimum number of students necessary to have valid and reliable AYP determinations): South Carolina's minimum group size is 40. (The average across all states is approximately 30 students.)
- Annual measurable objectives (AMO) (the yearly target for the percentage of students required to be proficient or above for a school to make AYP):
 - 2008–09: South Carolina's goal for this year is 59 percent of students scoring proficient in grades 3-8 and 71 percent in high school in reading/language arts and 58 percent for grades 3-8 and 70 percent for high school in mathematics.
 - AMO type: South Carolina set its AMOs consistent with the statutory requirements, using a stair-step method. This means that AMOs increase in equal increments every three years.
- Confidence interval: The state does not use a confidence interval, but does use a standard error of measure in its calculations.
- Full academic year definition (for purposes of determining whether a student's score must be included in AYP determinations): In South Carolina, a student must be continuously enrolled in the district at the time of the 45-day enrollment count and remain until the time of testing in order to be included in AYP determinations.
- Graduation rate:
 - Currently, South Carolina is using a graduation rate that can be described as a completer rate, which means Connecticut divides the number of graduates by the number of graduates plus the dropouts from each of the previous four years.
 - As required by the recently issued Title I regulations, states must report graduation rate data, in the aggregate and disaggregated by subgroup, using the four-year adjusted cohort graduation rate beginning with report cards providing assessment results for the 2010-11 school year.
 - The graduation rate target South Carolina requires for the district or school to make AYP is 88.3 percent or improvement from the previous year in the current rate or the 3-year average.
 - According to the National Governor's Association 2008 report *Implementing Graduation Counts: State Progress to Date, 2008*, South Carolina had capability of calculating the 4-year rate in 2007.

- South Carolina uses a performance index when calculating AYP, where the numbers of student scoring in a category are multiplied by weights: scores of Proficient or Advanced are weighted 100; scores of Basic, 75; Below Basic 2, 50; and Below Basic 1, 25. The results are summed and divided by the total number of scores. South Carolina's AMOs were not set based on this performance index.

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

2.0 – ACADEMIC ACHIEVEMENT STANDARDS

1. Complete achievement level descriptors for both the Palmetto Achievement Challenge Tests (PACT) and the End-of-Course Program–Physical Science (EOCEP-PS) that cover the full range of the performance level and not just the cut-score descriptors are required.
2. Technically sound standard setting for the EOCEP-PS that produces the required descriptors and cut-scores. Currently, the standards appear to be only pass/fail and lack the required number of levels of achievement.
3. Acceptable descriptors for the South Carolina Alternate Assessment (SC-Alt) that do not reference process tasks (such as participate, attend, observe) and contain sufficient description of content.

3.0 – FULL ASSESSMENT SYSTEM

1. Evidence that the PACT and EOCEP-PS science assessments address higher thinking skills, as per the recommendation of the Education Oversight Committee.

4.0 – TECHNICAL QUALITY

1. Evidence of consequential and discriminant/convergent validity for all tests. Criteria for the selection of judges for the PACT standard setting are also required.
2. Evidence regarding the reliability of scores for subpopulations for the PACT and EOCEP-PS, the conditional standard error of measurement (CSEMs) for the EOCEP-PS and the SC-Alt, as well as a plan to increase the overall reliability of assessments.
3. A plan to remedy the alignment gap noted by the Education Oversight Committee that assures the integrity of equating of the EOCEP-PS and addresses the alignment gaps related to the Inquiry and Physics standard.
4. The Technical Manual for 2008 for the PACT and EOCEP-PS assessments, including CSEMs at all levels, as well as a description of the linking and equating methodology.
5. Equating and calibration details for the SC-Alt.
6. A revised copy of page five of the PACT manual reflecting the elimination of the reference to out-of-level testing.

5.0 – ALIGNMENT

1. A comprehensive independent alignment study for the PACT and the EOCEP-PS.
2. A plan for addressing the concerns/findings from the SC-Alt alignment study.
3. Additional explanation of the SC-Alt linking design and the use of the Student Placement Questionnaire in determining starting tasks for the students.

6.0 – INCLUSION

1. Data that show that all students in the grades tested are included in the assessment system for both the PACT and EOCEP-PS.

7.0 – REPORTING

1. PACT and EOCEP-PS score reports that include performance descriptors, and guidance for interpretation and use.
2. PACT and EOCEP-PS summary reports that include the numbers of students tested/not tested or the total number of students enrolled/tested.