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Consolidated State Application Accountability Workbook

for State Grants under Title IX, Part C, Section 9302 of the Elementary and Secondary Education Act (Public Law 107-110)

REVISED: July 21, 2008



U. S. Department of Education Office of Elementary and Secondary Education Washington, D.C. 20202

Instructions for Completing Consolidated State Application Accountability Workbook

By January 31, 2003, States must complete and submit to the Department this Consolidated State Application Accountability Workbook. We understand that some of the critical elements for the key principles may still be under consideration and may not yet be final State policy by the January 31 due date. States that do not have final approval for some of these elements or that have not finalized a decision on these elements by January 31 should, when completing the Workbook, indicate the status of each element which is not yet official State policy and provide the anticipated date by which the proposed policy will become effective. In each of these cases, States must include a timeline of steps to complete to ensure that such elements are in place by May 1, 2003, and implemented during the 2002-2003 school year. By no later than May 1, 2003, States must submit to the Department final information for all sections of the Consolidated State Application Accountability Workbook.

Transmittal Instructions

To expedite the receipt of this Consolidated State Application Accountability Workbook, please send your submission via the Internet as a .doc file, pdf file, rtf or .txt file or provide the URL for the site where your submission is posted on the Internet. Send electronic submissions to conapp@ed.gov.

A State that submits only a paper submission should mail the submission by express courier to:

Celia Sims U.S. Department of Education 400 Maryland Ave., SW Room 3W300 Washington, D.C. 20202-6400 (202) 401-0113

PART I: Summary of Required Elements for State Accountability Systems

Instructions

The following chart is an overview of States' implementation of the critical elements required for approval of their State accountability systems. States must provide detailed implementation information for each of these elements in Part II of this Consolidated State Application Accountability Workbook.

For each of the elements listed in the following chart, States should indicate the current implementation status in their State using the following legend:

- **F:** State has a final policy, approved by all the required entities in the State (e.g., State Board of Education, State Legislature), for implementing this element in its accountability system.
- **P:** State has a proposed policy for implementing this element in its accountability system, but must still receive approval by required entities in the State (e.g., State Board of Education, State Legislature).
- W: State is still working on formulating a policy to implement this element in its accountability system.

Summary of Implementation Status for Required Elements of State Accountability Systems

	inciple	1: All Schools
F	1.1	Accountability system includes all schools and districts in the state.
F	1.2	Accountability system holds all schools to the same criteria.
F	1.3	Accountability system incorporates the academic achievement standards.
F	1.4	Accountability system provides information in a timely manner.
F	1.5	Accountability system includes report cards.
F	1.6	Accountability system includes rewards and sanctions.
Pri	inciple	2: All Students
F	2.1	The accountability system includes all students
F	2.2	The accountability system has a consistent definition of full academic year.
F	2.3	The accountability system properly includes mobile students.
	inciple :	3: Method of AYP Determinations
F	3.1	Accountability system expects all student subgroups, public schools, and LEAs to reach proficiency by 2013-14.
F	3.2	Accountability system has a method for determining whether student subgroups, public schools, and LEAs made adequate yearly progress.
F	3.2a	Accountability system establishes a starting point.
F	3.2b	Accountability system establishes statewide annual measurable objectives.
F	3.2c	Accountability system establishes intermediate goals.
Pri	inciple /	4: Annual Decisions

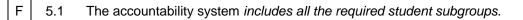
4.1 The accountability system *determines annually the progress* of schools and districts.

STATUS Legend:

F – Final state policy
 P – Proposed policy, awaiting State approval
 W – Working to formulate policy

CONSOLIDATED STATE APPLICATION ACCOUNTABILITY WORKBOOK

Principle 5: Subgroup Accountability



- F 5.2 The accountability system holds schools and LEAs accountable for the progress of student subgroups.
- F 5.3 The accountability system includes students with disabilities.
- F 5.4 The accountability system includes *limited English proficient students*.
 - 5.5 The State has determined the minimum number of students sufficient to yield statistically reliable information for each purpose for which disaggregated data are used.
 - 5.6 The State has strategies to protect the privacy of individual students in reporting achievement results and in determining whether schools and LEAs are making adequate yearly progress on the basis of disaggregated subgroups.

Principle 6: Based on Academic Assessments

6.1 Accountability system is based *primarily on academic assessments*.

Principle 7: Additional Indicators

F

F

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F

F

F

- 7.1 Accountability system includes graduation rate for high schools.
- F 7.2 Accountability system includes an *additional academic indicator for elementary and middle schools*.
- F 7.3 Additional indicators are valid and reliable.

Principle 8: Separate Decisions for Reading/Language Arts and Mathematics

F 8.1 Accountability system holds students, schools and districts separately accountable for *reading/language arts* and *mathematics*.

Principle 9: System Validity and Reliability

- F 9.1 Accountability system produces *reliable decisions*.
 - 9.2 Accountability system produces *valid decisions*.
 - 9.3 State has a plan for addressing *changes in assessment and student population*.

Principle 10: Participation Rate

- F 10.1 Accountability system has a means for calculating the *rate of participation* in the statewide assessment.
 - 10.2 Accountability system has a means for applying the 95% assessment criteria to student subgroups and small schools.

STATUS Legend: F – Final policy P – Proposed Policy, awaiting State approval W– Working to formulate policy

PART II: State Response and Activities for Meeting State Accountability System Requirements

Instructions

In Part II of this Workbook, States are to provide detailed information for each of the critical elements required for State accountability systems. States should answer the questions asked about each of the critical elements in the State's accountability system. States that do not have final approval for any of these elements or that have not finalized a decision on these elements by January 31, 2003, should, when completing this section of the Workbook, indicate the status of each element that is not yet official State policy and provide the anticipated date by which the proposed policy will become effective. In each of these cases, States must include a timeline of steps to complete to ensure that such elements are in place by May 1, 2003, and implemented during the 2002-2003 school year. By no later than May 1, 2003, States must submit to the Department final information for all sections of the Consolidated State Application Accountability Workbook.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
1.1 How does the State Accountability System include every public school and LEA in the State?	Every public school and LEA is required to make adequate yearly progress and is included in the State Accountability System. State has a definition of "public school" and "LEA" for AYP accountability purposes. The State Accountability System produces AYP decisions for all public schools, including public schools with variant grade configurations (e.g., K- 12), public schools that serve special populations (e.g., alternative public schools, juvenile institutions, state public schools for the blind) and public charter schools. It also holds accountable public schools with no grades assessed (e.g., K-2).	A public school or LEA is not required to make adequate yearly progress and is not included in the State Accountability System. State policy systematically excludes certain public schools and/or LEAs.

PRINCIPLE 1. A single statewide Accountability System applied to all public schools and LEAs.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

lowa Code subsection 257.2 defines a public school district as "a school corporation organized under chapter 274." lowa Code subsection 279.39 and 281-lowa Administrative Code (IAC) 12.3(9) requires local boards to establish attendance centers (buildings) and grade-level organizations for the buildings under their jurisdiction. In addition, lowa Code subsection 256.7(21)(c) requires school districts, as accredited in lowa, to annually report the progress of student achievement. Therefore, each school district and public school shall be accountable to report progress under AYP. For accountability purposes, a public school that does not house the required grades must back map student results from the school or schools into which its students feed for AYP determination.

Achievement scores for students in any facility or center that is not currently designated as an accredited public school district, but the district provides the educational program for lowa resident students whose total educational program is supported by state school aid formula (lowa Code 257), shall provide the scores for accountability purposes to the public school district/attendance center that was the last recorded residence of the student. These scores must be transmitted to the resident district/attendance center under the following conditions: 1) if a student meets the full academic year requirement for proficiency, and 2) if the resident district was part of the decision-making team to place the student in another setting for educational purposes. When students do not meet these two conditions, the assessment results for such students will only be included at the state level within the accountability system. Students in nonpublic schools are not included in the accountability system.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
1.2 How are all public schools and LEAs held to the same criteria when making an AYP determination?	All public schools and LEAs are systematically judged on the basis of the same criteria when making an AYP determination. If applicable, the AYP definition is integrated into the State Accountability System.	Some public schools and LEAs are systematically judged on the basis of alternate criteria when making an AYP determination.

In lowa, all public schools and LEAs will be held to the same process and criteria for making AYP toward 100% proficiency by the 2013-14 school year. For purposes of AYP accountability, all public schools and LEAs will be judged by performance and improvement on the lowa Tests of Basic Skills (ITBS) and the lowa Tests of Educational Development (ITED). These measures are the common comparable measures across all school districts, thus, ensuring fairness, validity, and reliability when making unbiased, rational, and consistent determinations of the annual progress of LEAs and schools within the state. All schools and districts will be expected to make improvement in student achievement. Currently, the AYP formula applies to all students in grades 3 through 8 and 11 in reading and mathematics.

All public school buildings and districts will also be accountable for subgroup performance as required by federal law provided the subgroup meets the minimum size requirement (30) as determined by the state.

All public school buildings and districts will make progress towards or maintain (within the bounds of statistical similarity) the state average for other academic indicators. For graduation rate, the State Board of Education has identified a graduation rate of 95% as the end-goal. School districts and schools with a graduation rate less than the state average will be expected to increase each year at a minimum (for each group below the state average). The same expectations will be applied to elementary and middle schools for attendance rates. School districts and schools with K-8 attendance rates less than the state average will be expected to increase their rates each year at a minimum (for each group below the state average) until they reach the state average. LEAs will be encouraged to exercise their local control flexibility to establish more rigorous goals for these other academic indicators. Group size of an n of 30 will apply to the other academic indicators.

Failure to meet AYP (relative to the state annual goals) by a school or school district for two consecutive years on any of the following indicators will result in a "need of improvement" designation:

- Participation rate in reading assessment and AMO
- Participation rate in mathematics assessment and AMO
- K-8 attendance rates (by building and district)
- Graduation rate (by building and district). Graduation rate data will be one year in arrears, to allow schools to include summer graduates in their total counts. For example, the 2001-2002 graduation rate will be used for 2002-2003 AYP decisions, and the 2002-2003 graduation rate will be used for 2003-2004 AYP decisions.
- If any school district fails to meet AYP (using annual data for the AMO) for two consecutive years in either the "all students" group or one of the subgroups at all the required grade levels it shall be identified as in need of improvement.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
1.3 Does the State have, at a minimum, a definition of <i>basic</i> , <i>proficient</i> and <i>advanced</i> student achievement levels in reading/language arts and mathematics?	State has defined three levels of student achievement: <i>basic</i> , <i>proficient</i> and <i>advanced</i> . ¹ Student achievement levels of <i>proficient</i> and <i>advanced</i> determine how well students are mastering the materials in the State's academic content standards; and the <i>basic</i> level of achievement provides complete information about the progress of lower-achieving students toward mastering the <i>proficient</i> and <i>advanced</i> levels.	Standards do not meet the legislated requirements.

To develop achievement standards, Iowa Testing Programs developed an achievement-levels reporting system to assist Iowa school districts in meeting Title I reporting requirements. The score report districts receive (Achievement Levels Report) shows the test score scale broken into three main segments called "Low," "Intermediate," and "High." The percent of students in a given grade (e.g., grade 8) who score in each achievement level in a certain subject area (e.g., reading comprehension) is reported. The number of students who score in the Intermediate and High level determines proficiency.

¹ System of State achievement standards will be reviewed by the Standards and Assessments Peer Review. The Accountability Peer Review will determine that achievement levels are used in determining AYP.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
1.4 How does the State provide accountability and adequate yearly progress decisions and information in a timely manner?	State provides decisions about adequate yearly progress in time for LEAs to implement the required provisions before the beginning of the next academic year. State allows enough time to notify parents about public school choice or supplemental educational service options, time for parents to make an informed decision, and time to implement public school choice and supplemental educational services.	Timeline does not provide sufficient time for LEAs to fulfill their responsibilities before the beginning of the next academic year.

lowa school districts have been required to submit Annual Progress Reports (APRs) to the DE, their area education agencies (AEAs), and local communities since the year 2000. The APR contains all required achievement data for state and federal reporting. The DE revises APR requirements on an annual basis to comply with any new federal and state legislation. The APR must contain the student achievement results from the past school year for the required academic indicators. Each school district, according to lowa law, is required to report the results of multiple assessments for reading and mathematics. Each local district is also required to demonstrate alignment of assessments to their standards. It is expected that the district's assessment system provides the information needed for a district to determine needed changes in curriculum and professional development to improve instructional practices. This type of rich and deep assessment system also provides frequent data to teachers and buildings for needed adjustments and modifications to assist in improving student learning. They also provide a basis for districts to anticipate if their students will attain proficiency on the comparable measure across districts, the ITBS and the ITED.

The DE will assist school districts in identifying schools in need of improvement during each summer before the school year begins. This identification will be completed around August 1 of each year.

All public districts with schools identified as in need of improvement for two consecutive years are required to offer school choice for their enrolled students during the school year in which they are identified.

All public districts with Title I schools identified as missing AYP for three or more consecutive years are required to offer school choice and supplementary services and take corrective actions, as required by NCLB, during the school year in which they are identified.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
1.5 Does the State Accountability System produce an annual State Report Card?	The State Report Card includes all the required data elements as stipulated in No Child Left Behind. The State Report Card is available to the public at the beginning of the academic year. The State Report Card is accessible in languages of major populations in the State, to the extent possible. Assessment results and other academic indicators (including graduation rates) are reported by student subgroups	The State Report Card does not include all the required data elements. The State Report Card is not available to the public.

Each year the DE will publish and disseminate a state report card that contains all NCLB reporting requirements. This report card will be accessible through the DE's Web site. This report will be in addition to the comprehensive annual state report, *The Annual Condition of Education Report.* This report contains statewide demographic and student achievement data. The state report card is distributed to every LEA, AEA, policymakers, and community leaders and is downloadable from the DE's Web site. A list of current Iowa schools in need of improvement is published in the state report card. Graduation rates for gender and race/ethnicity are also reported. All federal reporting requirements will be included in the state report card.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
1.6 How does the State Accountability System include rewards and sanctions for public schools and LEAs? ²	 State uses one or more types of rewards and sanctions, where the criteria are: Set by the State; Based on adequate yearly progress decisions; and, Applied uniformly across public schools and LEAs. 	State does not implement rewards or sanctions for public schools and LEAs based on adequate yearly progress.

Currently, the state collects information on the academic progress of all schools and districts that house the required grades for testing by Iowa Iaw and in compliance with the '94 ESEA. In the past, only Title I schools have been identified as schools in need of improvement if the school failed to make AYP in reading and/or mathematics. Identified schools implement local action plans for improvement and receive technical assistance in the areas of reading and mathematics to successfully implement those plans. All school districts have been required by Iowa Code 256.7 and 281-IAC 12.8(4) to establish annual student achievement improvement goals. If the goals are not met for two consecutive years, a school district is required to file a corrective action plan with the DE and inform the community. Continued failure to meet the goals can result in a district self-study in consultation with the DE, revised school improvement plans, site visits by the DE, and institution of a Phase II accreditation visit by the DE which can result in sanctions up to and including the loss of accreditation. 281-IAC 8(4)

Public school buildings and districts will be identified if the required growth established by AYP is not met for two consecutive years and the corrective actions and sanctions required by federal code will be implemented in Title I buildings.

The lowa State Board of Education will annually recognize school districts and schools that have significantly reduced achievement gaps in reading and mathematics for the required subgroups.

² The state must provide rewards and sanctions for all public schools and LEAs for making adequate yearly progress, except that the State is not required to hold schools and LEAs not receiving Title I funds to the requirements of section 1116 of NCLB [§200.12(b)(40)].

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
2.1 How does the State Accountability System include all students in the State?	All students in the State are included in the State Accountability System. The definitions of "public school" and "LEA" account for all students enrolled in the public school district, regardless of program or type of public school.	Public school students exist in the State for whom the State Accountability System makes no provision.

All students enrolled in public schools will be included in the calculation of AYP at the school, district, and state level. All public school students in the state are currently required by 281-IAC 12.8 (1)(f) to be assessed in reading and mathematics at least once a year. By Iowa policy, 281-IAC 41.3(2) the state holds each district responsible for either providing or making provisions for appropriate special education and related services to meet the requirement of state and federal statutes and rules. Iowa policy requires the attending district to report progress to the resident district. For accountability purposes, the assessment results will be included within the resident district's accountability system under the following conditions: 1) if a student meets the full academic year requirement for proficiency calculations; and 2) if the resident district was part of the decision-making team to place the student in another setting for educational purposes. When students do not meet these two conditions, the assessment results for such students will only be included at the state level within the accountability system.

lowa has implemented a student level management information system to collect the necessary accountability information. This system enables districts and the state to provide accountability information in the aggregate and by subgroup, where appropriate.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
2.2 How does the State define "full academic year" for identifying students in AYP decisions?	The State has a definition of "full academic year" for determining which students are to be included in decisions about AYP. The definition of full academic year is consistent and applied statewide.	LEAs have varying definitions of "full academic year." The State's definition excludes students who must transfer from one district to another as they advance to the next grade. The definition of full academic year is not applied consistently.

The electronic record system described in the previous section has enabled districts and the state to determine students who have been enrolled for a full academic year.

For accountability purposes, a full academic year will be determined for each individual student who was enrolled on the first day of the testing period for ITBS and ITED in the previous school year and enrolled through the academic year to the first day of the testing period for ITBS and ITED for the current school year.

For those students using the portfolio process to demonstrate achievement through the alternate assessment, March 31 is the "official" due date for the alternate assessment (i.e., due date for completion of portfolios and date for full academic year determinations). If a student is enrolled, even if not for a full academic year, teachers are to collect evidence for a portfolio and submit it for scoring (this way, the student will count in the participation rate). If a student moves during the year, the portfolio must follow the student to the new district. Those who were continuously enrolled from the prior March 31 will be counted as having been enrolled for a Full Academic Year, and those results will be included with the AMO determinations.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
2.3 How does the State Accountability System determine which students have attended the same public school and/or LEA for a full academic year?	State holds public schools accountable for students who were enrolled at the same public school for a full academic year. State holds LEAs accountable for students who transfer during the full academic year from one public school within the district to another public school within the district.	State definition requires students to attend the same public school for more than a full academic year to be included in public school accountability. State definition requires students to attend school in the same district for more than a full academic year to be included in district accountability. State holds public schools accountable for students who have not attended the same public school for a full academic year.

Since 1999, all students in a school are to be tested if enrolled on the testing date. School districts have been required to report to the DE on an annual basis the number of students enrolled on the date of testing and the number who participated in the test. All students' status for enrollment will be coded on the test forms for ITBS and ITED. This will provide each school district and the state with the scores for students who have been in attendance for a full academic year at the district and state level. Thus, each student score will be calculated into the proficiency levels for the school, district, and state level to determine AYP. Each public school building and each public school district will be held accountable for those students who have been enrolled for a full academic year.

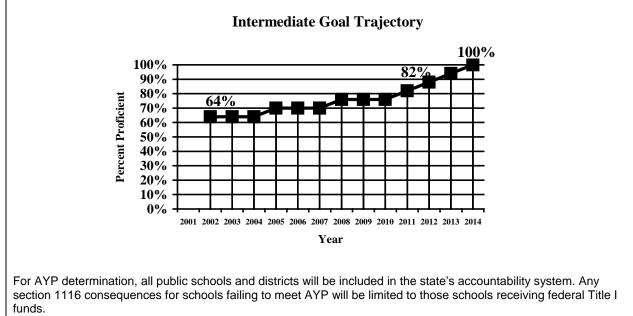
PRINCIPLE 3. State definition of AYP is based on expectations for growth in student achievement that is continuous and substantial, such that all students are proficient in reading/language arts and mathematics no later than 2013-2014.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
How does the State's definition of adequate yearly progress require all students to be proficient in reading/language arts and mathematics by the 2013-2014 academic year?	The State has a timeline for ensuring that all students will meet or exceed the State's proficient level of academic achievement in reading/language arts ³ and mathematics, not later than 2013-2014.	State definition does not require all students to achieve proficiency by 2013-2014. State extends the timeline past the 2013-2014 academic year.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

The state has defined AYP to require all students to be proficient in both reading and mathematics by the end of the 2013-2014 academic year. Proficiency for reading and mathematics will be determined separately for each content area and grade span (3-5, 6-9, and 10-12), and will be operationally defined as those students who achieve the 41st percentile (national student norms) or higher on the ITBS or the ITED.

The same mathematical formula will be used to determine the extent to which all LEAs, buildings within an LEA, and subgroups within buildings and LEAs have met AYP. Pursuant to 34CFR 200.17(a) and (b), the state's trajectory will consist of six equal, incremental increases for student proficiency levels. (Also see Appendix A: The Iowa Model)



If an assessment that is included in the state's determination of AYP is taken more than once by a student, the results of the initial administration of that test will be the result that will be included in the AYP determination.

³ If the state has separate assessments to cover its language arts standards (e.g., reading and writing), the State must create a method to include scores from all the relevant assessments.

	CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF <i>NOT</i> MEETING REQUIREMENTS
3.1	How does the State Accountability System determine whether each student subgroup, public school and LEA makes AYP?	For a public school and LEA to make adequate yearly progress, each student subgroup must meet or exceed the State annual measurable objectives, each student subgroup must have at least a 95% participation rate in the statewide assessments, and the school must meet the State's requirement for other academic indicators. However, if in any particular year the student subgroup does not meet those annual measurable objectives, the public school or LEA may be considered to have made AYP, if the percentage of students in that group who did not meet or exceed the proficient level of academic achievement on the State assessments for that year decreased by 10% of that percentage from the preceding public school year; that group made progress on one or more of the State's academic indicators; and that group had at least 95% participation rate on the statewide assessment.	State uses different method for calculating how public schools and LEAs make AYP.

AYP for student subgroups will be determined at the school level by content area and grade.

AYP at the district level will be determined by content area and when all required grade levels (4, 8, and 11) have either the "all students" group or one of the subgroups that do not meet AYP state targets.

Schools and districts will be held to the following requirements:

- A minimum of 95% of all students and each subgroup (meeting the minimum-n requirements) included in the assessment program,
- Meet or exceed the annual measurable objectives and intermediate goals, or be within the confidence interval for statistical significance, or meet the safe harbor requirement, and
- Meet or exceed the state's requirement for other academic indicators. For graduation rate, the State Board of Education has identified a graduation rate of 95% as the end-goal. School districts and schools with graduation rates less than the state average will be expected to increase their rates (for each group below the state average) until they reach the state average. The same expectations will be applied to elementary and middle schools for Average Daily Attendance. School districts and schools with K-8 attendance rates less than the state average will be expected to increase their rates (for each group below the state average will be expected to increase their local control flexibility to establish more rigorous goals for these other academic indicators.

Participation Rate: Participation rates will be calculated for each school by combining the number of students assessed in each tested grade, and dividing by the combined enrollment for the tested grades at each site. As up to two prior years of participation data are examined to determine if a school meets participation rate, the state will utilize a weighted averaging procedure to average the data over time. Iowa will continue to use annual data to monitor participation rates for all included grades, with a minimum-n of 40 as the threshold for AYP decisions. For schools not meeting the 95% required participation rate, IDE will average up to three years of (weighted) data (for Grade 4, 8, and 11 only) to evaluate the extent to which participation rate requirements have been met.

Proficiency Rate: Using annual data, AMOs have been calculated for each of grades 3-8 and 11, for each content area and subgroup (Appendix B). The minimum-n size will be 30 (full academic year students) for AYP decisions based on proficiency. Iowa will continue to implement safe harbor provisions, as well as uniform averaging of up to three years of data, and a 98% confidence interval for AYP decisions.

As school-level decisions are required to be made, IDE will implement a Proficiency Index to determine AMOs achievement rates. The following method will be used:

- 1. We will calculate the amount (percent) that a grade in a school is above or below the current grade level AMO.
- A weighting constant (WC) will be calculated for each grade level, and will equal the proportion of Full Academic Year (FAY) students in each tested grade. The calculation will be done for each grade, and will be the sum of the tested FAY students in each tested grade divided by the sum of the tested FAY students in all tested grades combined.
- 3. We will multiply the WC by the distance from the AMO for each grade level. The sum of these portions will constitute a Proficiency Index for the school.
- 4. If the Proficiency Index is equal to or greater than zero, the school will meet the AMO. If the Proficiency Index is less than zero, the school will not meet the AMO, and the 98%, one-tailed Confidence interval will be applied. If the sum of the confidence interval and the Proficiency Index is equal to or greater than zero, the school/group meets the AMO.
- 5. The number of students tested for all tested grades combined will serve as the n-count for the confidence interval calculation.

If a school misses AYP (AMO) at the elementary level (Grades 3-5), lowa will use the two years of data available for Grade 4 to determine if Safe Harbor has been met. If not, lowa will use uniform averaging of two or three years of data (with a 98% confidence interval) to determine if student achievement targets have been met. If Grade 4 meets AYP, in the absence of available data for Grades 3 and 5, the school will make AYP. There will be some variance with this interpretation since some elementary schools include Grade 6 as part of their elementary configuration.

If a school misses AYP (AMO) at the middle level (Grades 6-8), Iowa will use the two years of data available for Grade 8 to determine if Safe Harbor has been met. If not, Iowa will use uniform averaging of two or three years of data (with a 98% confidence interval) to determine if student achievement targets have been met. If Grade 8 meets AYP, in the absence of available data for Grades 6 and 7, the school will make AYP. There will be some variance with this interpretation since some middle schools include different grades as part of their middle school configuration.

lowa will continue to use up to three years of Grade 11 data (current year and two years in arrears) to determine if Safe Harbor has been met (using past year and current year), or if AYP has been met through uniform averaging of two or three years of data (with a 98% confidence interval).

District AYP: Under the 3 through 8 structure, in order to miss AYP at the district level, a district would have to miss AYP at the elementary level, at the middle school level, and at high school (Grade 11). Grades 3-5 will be combined and used to make the elementary level AYP determination for the district. Grades 6-8 will be combined used to make the middle school level AYP determination for the district.

For district-level decisions, IDE will utilize the Proficiency Index system described earlier to determine appropriate proficiency rates. The following method will be used:

- 1. We will calculate the amount (percent) that a grade in a district is above or below the current grade level AMO.
- 2. A weighting constant (WC) will be calculated for each grade level, and will equal the proportion of Full Academic Year (FAY) students in each tested grade. The calculation will be done for each grade, and will be the sum of the tested FAY students in each tested grade divided by the sum of the tested FAY students in all tested grades combined.

- 3. We will multiply the WC by the distance from the AMO for each grade level. The sum of these portions will constitute a Proficiency Index for the district.
- 4. If the Proficiency Index is equal to or greater than zero, the district will meet the AMO. If the Proficiency Index is less than zero, the district will not meet the AMO, and the 98%, one-tailed Confidence interval will be applied. If the sum of the confidence interval and the Proficiency Index is equal to or greater than zero, the district/group meets the AMO.
- 5. The number of students tested for all tested grades combined will serve as the n-count for the confidence interval calculation.

If the elementary level (Grades 3-5) misses AYP (AMO), IDE will use the two years of data available for Grade 4 to determine if Safe Harbor has been met. If not, IDE will use uniform averaging of two or three years of data (with a 98% confidence interval) to determine if student achievement targets have been met. If Grade 4 meets AYP, in the absence of available data for Grades 3 and 5, the level (and also the district) will make AYP.

If the middle school level (Grades 6-8), misses AYP (AMO), IDE will use the two years of data available for Grade 8 to determine if Safe Harbor has been met. If not, IDE will use uniform averaging of two or three years of data (with a 98% confidence interval) to determine if student achievement targets have been met. If Grade 8 meets AYP, in the absence of available data for Grades 6 and 7, the level (and also the district) will make AYP.

For the high school level AYP determination, lowa will continue to use up to three years of Grade 11 data (current year and two years in arrears) to determine if Safe Harbor has been met (using past year and current year), or if AYP has been met through uniform averaging of two or three years of data (with a 98% confidence interval).

Additionally, for a district to be identified for missing AYP, if a school meets the participation or proficiency targets, the district will have to miss the other academic indicator for all levels. In other words, if a district makes AYP on the primary assessment, they will be identified as missing AYP if they miss both the Graduation rate target and the Average Daily Attendance rate target.

lowa's Approved Growth Model

The IDE incorporates growth determinations into the current AYP model. Accountability determinations maintain the current status determinations, but incorporate student growth during the AYP decision process. Briefly, we conduct two parallel AYP processes built to incorporate Iowa's approved accountability plan for status.

Status process:

- The first step is to evaluate school performance by examining status gauged against the current AMO, using a proficiency index established at the state level.
- The second step is to evaluate safe harbor. For schools/districts who do not meet the AMO, the IDE would determine if the school/district qualifies for safe harbor. This is done by a school/district reducing the percent of non-proficient students by at least 10 percent from year 1 to year 2, for example, Grade 3 in year 1 to Grade 3 in year 2. If that occurs, the reduction in the percent of non-proficient students would enable the school/district to meet AYP through safe harbor.
- The third step is to utilize two years of uniformly averaged data using a proficiency index, to determine if the school/district met AYP.
- The fourth step is to utilize three years of uniformly averaged data calculating a weighted percent proficient, to determine if the school/district met AYP.

Growth process:

- The IDE incorporates the following growth model: Iowa currently utilizes three achievement levels (Low, Intermediate, and High) for AYP decisions. The Intermediate and High achievement levels are considered proficient. The Low achievement level is further divided into two achievement levels: Weak and Marginal. The Marginal level contains two regions: Low Marginal (containing the lowest part of the Marginal level) and High Marginal (a region that contains the scale score points that are within one standard error of measurement below the cut score for proficient). This process would begin with the percent of students' proficient from, for example, Grade 3 to Grade 4. Non-proficient students who make "Adequate Yearly Growth" or AYG (defined as a movement from the Weak achievement level to the Marginal level, or from the Low Marginal region to the High Marginal region) will be counted as proficient for AYP purposes.
- In the growth model, students have four consecutive years to attain proficient status, beginning with their initial participation in the statewide assessment. Under the model, a particular student may only count for AYG a maximum of two times in their entire testing history.

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AYP determination:

 The number of students meeting status AYP is added to the number of students making AYG. A percent of students meeting AYP/AYG is then calculated. This percent is then compared to the state target for AYP status decisions. A school/district that met the proficiency Index (within the confidence interval) through the combination of AYP status proficiency and AYG would make AYP.

A full description is available at http://www.iowa.gov/educate/component/option.com_docman/task.doc_download/gid.3817/

	EXAMPLES FOR	EXAMPLES OF
CRITICAL ELEMENT	MEETING REQUIREMENTS	NOT MEETING REQUIREMENTS
3.2a What is the State's starting point for calculating Adequate Yearly Progress?	Using data from the 2001-2002 school year, the State established separate starting points in reading/language arts and mathematics for measuring the percentage of students meeting or exceeding the State's proficient level of academic achievement.	The State Accountability System uses a different method for calculating the starting point (or baseline data).
	Each starting point is based, at a minimum, on the higher of the following percentages of students at the proficient level: (1) the percentage in the State of proficient students in the lowest-achieving student subgroup; or, (2) the percentage of proficient students in a public school at the 20 th percentile of the State's total enrollment among all schools ranked by the percentage of students at the proficient level.	
	A State may use these procedures to establish separate starting points by grade span; however, the starting point must be the same for all like schools (e.g., one same starting point for all elementary schools, one same starting point for all middle schools).	
STATE RESPONSE AND STATE	ACTIVITIES FOR MEETING REQU	IREMENTS
The state's initial starting points, for ea percent of students proficient at the 20 proficient. Using the 2000-2001 and 20 Grade Level (3-5) (6-9) (10-12)	ich content area and level, determined in t ^h percentile in enrollment with schools ra 001-2002 biennium data, these were: Reading Mathematics 65 64 61 63 69 69	anked from high to low by percent
The current starting points were calculated using Grade 4, Grade 8, and Grade 11 results, (these are the only grades currently required by Iowa Administrative Code). Local education agencies were required to administer tests in the additional grades (3, 5, 6, and 7), during 2005-2006, and these additional grades are included in the AYP determinations. Results across the required grades within a building will be collapsed to create a single target for reading and mathematics at each school building, pursuant to section 3.1.		
Administrative Code), 40 as the thresh 30 as the threshold for establishing ba- who have been enrolled for at least on	be using 10 as the threshold for reportin old for participation rates in the district-w selines for the reportable groups for AYF e full academic year (enrolled at the beg in the AYP calculations, at the building, L	A construction of the testing period during testing period during the testing period during

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF <i>NOT</i> MEETING REQUIREMENTS
3.2b What are the State's annual measurable objectives for determining adequate yearly progress?	State has annual measurable objectives that are consistent with a state's intermediate goals and that identify for each year a minimum percentage of students who must meet or exceed the proficient level of academic achievement on the State's academic assessments. The State's annual measurable objectives ensure that all students meet or exceed the State's proficient level of academic achievement within the timeline. The State's annual measurable objectives are the same throughout the State for each public school, each LEA, and each subgroup of students.	The State Accountability System uses another method for calculating annual measurable objectives. The State Accountability System does not include annual measurable objectives.

lowa's current accountability system requires all LEAs to annually demonstrate improvement toward their long-range goals in reading and mathematics. In the model described in section 3.1, the annual measurable objective is to accelerate, or, at a minimum, maintain the trajectory established by the mathematical formula. Because of the use of unified accountability trajectories by the state, all LEAs, grades within LEAs, subgroups within LEAs, and all buildings will be expected to attain the state's trajectory. During years 3, 6, 9, 10, 11, and 12 of the plan, the intermediate goals are also the annual measurable objectives. During the other years (1, 2, 4, 5, 7, and 8), the annual measurable objective is not met, confidence interval determination and safe harbor notwithstanding.

Pursuant to section 3.1, data will be combined for all grades at a school site for AYP decisions. For district AYP decisions, proficiency indices will be determined by level (elementary, 3-5; middle, 6-8, high, 11). This process will also increase the number of students, narrow the width of the confidence band, and reduce the number of subgroups that are excluded from AYP determinations.

The state will continue to use the trajectories, annual measurable objectives, and intermediate goals that were determined using baseline data. Annual data will be used for the following reasons:

- Schools that reorganize would be able to be included in the accountability system immediately, This would also enable a smoother transition from testing in Grades 4 and 8 to testing in Grades 3 through 8.
- Change in the percent of proficient students would be based on data from adjacent years. The technical
 issues surrounding "annualizing" results could be avoided, in favor of examining actual change from one
 year to the next.
- The confidence interval currently in place serves as a mechanism to account for sampling error, and is the preferred method over biennium averaging.

Full academic year will be defined as the time from the first day of a testing window in the previous school year to the first day of the testing window in the current school year. For example, if a student was enrolled on the first day of the testing window during the previous year (whether or not that student took the test), he/she will be counted as having been enrolled for a full academic year. The only way a student could be excluded from the test is if that student had a medical excuse. Pursuant to recent federal guidance, in the event that a student is unable to participate in the assessment due to a significant medical emergency, that student may be able to be excluded from the participation and proficiency rates. This will be handled on a case-by-case basis through the AYP appeal process.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF <i>NOT</i> MEETING REQUIREMENTS
3.2c What are the State's intermediate goals for determining adequate yearly progress?	 State has established intermediate goals that increase in equal increments over the period covered by the State timeline. The first incremental increase takes effect not later than the 2004-2005 academic year. Each following incremental increase occurs within three years. 	The State uses another method for calculating intermediate goals. The State does not include intermediate goals in its definition of adequate yearly progress.

The state has established six intermediate goals of equal increments. To make AYP, LEAs, schools, and subgroups must demonstrate at a minimum, a rate of change determined by the same mathematical formula that will keep those entities "on target" so that all students are proficient by 2013-2014.

Using six equal increments, for example, using 64% proficiency as a 2000-2001 baseline, for 36% points improvement in non-linear fashion:

First goal:	2004-2005: 6% points more of the total number of students proficient
Second goal:	2007-2008: 6% points more of the total number of students proficient
Third goal:	2010-2011: 6% points more of the total number of students proficient
Fourth goal:	2011-2012: 6% points more of the total number of students proficient
Fifth goal:	2012-2013: 6% points more of the total number of students proficient
Sixth goal:	2013-2014: 6% points more of the total number of students proficient
TOTAL:	36% points improvement, 100% proficient

To make AYP, LEAs, schools, and subgroups must demonstrate student proficiency at the state's target for that time period, fall within the confidence band for the number of students tested and the target proficiency level, or meet safe harbor requirements as specified by regulation. For example, by referring back to the chart in Appendix B., the 2000-2001 starting point will remain the same for three years, until 2004-2005, the time at which the intermediate goal must be reached. This will remain the same for the next three years, until 2008, when the intermediate goal will be achieved. This will remain the same for the next three years until 2011, when the intermediate goal will be achieved. The annual measurable objectives and the intermediate goals for 2012, 2013, and 2014 are the same (See Appendix B for specific grade level AMOs for reading and mathematics.)

PRINCIPLE 4. State makes annual decisions about the achievement of all public schools and LEAs.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS	
4.1 How does the State Accountability System make an annual determination of whether each public school and LEA in the State made AYP?	AYP decisions for each public school and LEA are made annually. ⁴	AYP decisions for public schools and LEAs are not made annually.	
STATE RESPONSE AND STATE	ACTIVITIES FOR MEETING REQU	JIREMENTS	
Based on the concept of continuous improvement for all schools, the proposed model integrates AYP into the state's current accountability system. Iowa's current accountability system requires that every LEA must establish annual improvement goals in reading, mathematics, and science. Also, current identification procedures stipulate that if a school achieves below the state target for two consecutive years, they are identified as in need of improvement. Two criteria to meet were that the model must not let any entity (school, district, state) escape responsibility for improvement as per state expectations, and ensure 100% proficiency by 2014, as per federal expectations. The proposed model fulfills both of these criteria.			
 If a school is achieving at or above the state's trajectory, and their rate of change is on track for 100% in 2014, they meet AYP for that year. If a school is achieving at or above the state's trajectory, and their rate of change is not on track for 100% in 2014, they meet AYP for that year but they will need to file a corrective action plan with the lowa Department of Education. If a school is not achieving at the state's trajectory, but their proportion of proficient students falls within the confidence interval, or if they meet the safe harbor requirements as specified in regulations, they meet AYP for 			
 If a school is not achieving at the confidence interval, and they fail AYP for that school year. If they grade span the school will be ide If a school does not achieve atterval 	confidence interval, and they fail to meet safe harbor requirements as specified in regulations, they do not meet AYP for that school year. If they do not meet AYP for two consecutive years within the same content area and grade span the school will be identified as a school in need of improvement.		
 as a school in need of improvement. If a school does not test 95% of all students in the aggregate and by required subgroups they will not meet AYP for that school year. If they do not meet AYP for two consecutive years the school will be identified as a school in need of improvement. 			
If an entity does not achieve an annual measurable objective or an intermediate goal, the SEA will implement a method to consider student-sampling error to investigate the extent to which the students tested are similar or dissimilar (in percent proficiency). This calculation will utilize a 98% (one-tailed) confidence band for the significance test.			
If an entity whose proportion of proficient students is statistically significantly different from (below) the state's trajectory target, the SEA will determine if the entity qualifies for safe harbor. The entity will need to have reduced the percent of non-proficient students by 10% or more, need to have met the target for the other academic indicator (for the disaggregated group), and have tested not less than 95% of the students enrolled in each eligible group.			

 $^{^4}$ Decisions may be based upon several years of data and data may be averaged across grades within a public school [§1111(b)(2)(J)].

In lowa, a school would be considered a new school if the enrollment change (due to realignment of grade structures) results in 50 percent or more new students from the previous year or enrollment decreases resulting in 50 percent or fewer of the former students remaining. In such situations, Adequate Yearly Progress (AYP) determinations will begin anew. In the event of mergers of schools containing the same grades, IDE will consider the AYP history of the buildings merging.

- a. If the receiving site has a majority of students, and the site was previously identified as missing AYP, that status will continue, regardless of the status of the sending site.
- b. If the sending site has a majority of students, and that site was previously identified as missing AYP, that status will continue, regardless of the current status of the receiving site.
- c. If a new physical facility is opened, the AYP status of that site will be that of the sending site with the majority of students. Simply opening a new school does not enable districts to avoid AYP identification.

PRINCIPLE 5. All public schools and LEAs are held accountable for the achievement of individual subgroups.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
	Identifies subgroups for defining adequate yearly progress: economically disadvantaged, major racial and ethnic groups, students with disabilities, and students with limited English proficiency. Provides definition and data source of subgroups for adequate yearly progress.	State does not disaggregate data by each required student subgroup.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

The subgroup reporting requirements, by state law, currently in force are more rigorous than the federal reporting requirements, and align with ESEA '94. As such, all LEAs have implemented systems that enable them to monitor the progress of each subgroup of students.

Regarding participation rates, Iowa Administrative Code currently requires all students to be accounted for under each LEAs district-wide assessment plan. Most are in the general academic assessment, while others participate in an alternate assessment.

The data for each group of students meeting the minimum-n of requirements and full academic year will be included in the AYP determinations.

To enable subgroup reporting at the state level, the DE electronically collects and maintains a database of individual student records. Each record contains the appropriate demographic information to enable subgroup aggregation for accountability measures. This serves as the infrastructure to append additional data elements/fields, which then would facilitate the establishment of a student-unit database for state level reporting. Additional information is currently collected from LEAs via a web-based data entry and verification system.

	CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
5.2	How are public schools and LEAs held accountable for the progress of student subgroups in the determination of adequate yearly progress?	Public schools and LEAs are held accountable for student subgroup achievement: economically disadvantaged, major ethnic and racial groups, students with disabilities, and limited English proficient students.	State does not include student subgroups in its State Accountability System.

The subgroup accountability requirements will be those required by NCLB. As such, all LEAs have implemented systems that enable them to report the progress of each subgroup of students for both reporting and accountability purposes. Minimum-n for reporting results to the community is ten. Participation rates, as well as additional information, are required to be included in each LEA's annual progress report.

The other academic indicators will be:

- Graduation rate (high school graduation with a regular diploma in the standard number of years)
- Average daily attendance (elementary and middle school).

If any public school fails to meet AYP (using annual data for the AMO everything to annual data beginning 2004-05) for two consecutive years in the same content area and grade levels combined, it shall be identified as in need of improvement. Full academic year and minimum-n of 30 applies. Confidence interval for statistical significance and safe harbor provisions apply as appropriate.

Additionally, if any school district fails to meet AYP (using annual data for the AMO), for two consecutive years in either the "all students" group or one of the subgroups at all the required grade levels (elementary, middle, high) it shall be identified as in need of improvement. Full academic year does not apply; minimum-n of 30 applies.

If a public school fails to meet the 95% participation rate (using annual participation rate data) for its building-wide assessment program (by content area and grade level), it fails to meet AYP. Full academic year does not apply; minimum-n of 40 applies.

If a school district fails to meet the 95% participation rate (using combined participation rate data) for its district-wide assessment program (by content area and in the all students group or one of the subgroups at all of the required grade levels (elementary, middle, high), it fails to meet AYP. Full academic year does not apply; minimum-n of 40 applies.

As described earlier in section 3.1, for any school or district not meeting participation rate or proficiency targets, the state will implement uniform averaging procedures, incorporating up to three years of data (current year and up to two years in arrears) to evaluate the extent to which the school or district meets AYP.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
How are students with disabilities included in the State's definition of adequate yearly progress?	All students with disabilities participate in statewide assessments: general assessments with or without accommodations or an alternate assessment based on grade level standards for the grade in which students are enrolled. State demonstrates that students with disabilities are fully included in the State Accountability System.	The State Accountability System or State policy excludes students with disabilities from participating in the statewide assessments. State cannot demonstrate that alternate assessments measure grade-level standards for the grade in which students are enrolled.

Local education agencies are responsible for the inclusion of all students in their district-wide assessment programs. Local education agencies are expected to test every student. This can be done in the general assessment, the general assessment with accommodations, or an alternate assessment. Beginning with the 2006-2007 school year, all students are expected to participate in the appropriate grade-level assessment. Any student taking an out-of-level test below their grade level peers will be counted as an exclusion for participation rate calculations for AYP.

Students tested in the general assessment with or without accommodations are included in the AYP determination. Students with significant disabilities who participate in the alternate assessment will be counted in the participation rate calculation. Proficiency scores of students participating in any alternate assessment that compares student performance with alternate achievement standards will be included as part of the 1% cap on proficiency at the district and state levels, as per regulations. Alternate assessment proficient scores for students, not to exceed 1% of the student enrollment in the tested grades, will be aggregated with the general education assessment for AMO determinations.

The revised regulation (34 CFR, Part 200, Federal Register, Tuesday, December 9, 2003) specifies an allowance of being able to combine the proficient scores from the alternate assessment for students with significant disabilities of up to 1% of all students in the grades assessed, with the proficiency scores of students in the general education assessment, for purposes of determining AYP. Iowa utilizes this provision in the calculation of proficiency rates for the AMOs and Intermediate Goals (IG).

We would encourage the USDE to reconsider the position on out-of-level tests. Testing students out-of-level either at levels below or above grade level peers is appropriate when standards are articulated across levels and vertical linkages of scale scores can allow a raw score to be translated so that it is comparable with grade level peers.

Pursuant to Secretary Spellings' flexibility for students with disabilities, Iowa will continue the interim flexibility for schools and districts identified for missing AYP solely on the basis of the students with disabilities subgroup. The proxy will continue to be 16 percent, and will be appended to the subgroup proficiency, and will not include use of the confidence interval for such schools or districts.

	CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
5.4	How are students with limited English proficiency included in the State's definition of adequate yearly progress?	All LEP student participate in statewide assessments: general assessments with or without accommodations or a native language version of the general assessment based on grade level standards.	LEP students are not fully included in the State Accountability System.
		State demonstrates that LEP students are fully included in the State Accountability System.	

Local education agencies are responsible for the inclusion of all students in their district-wide assessment programs. Local education agencies are expected to test every student. This could be done in the general assessment, the general assessment with accommodations, or an alternate assessment. Students tested in the general assessment with or without accommodations, as well as the alternate assessment based on alternate academic achievement standards, are included in the AYP determination.

Currently, an English language learners (ELL) assessment committee comprised of SEA, AEA, and LEA staff are participating in the development of an English language proficiency test, and an alternate assessment process for reading and mathematics. For English language proficiency, the committee is scheduled to participate in the LEP-SCASS pilot, and is also investigating the work of states that have developed their own English language assessments. For alternate assessment in reading and mathematics, the committee is investigating the implementation of a process that is similar to the alternate assessment for students with severe disabilities.

Development of an alternate assessment for ELL is in the beginning stages. Until this assessment is implemented, LEAs will have all ELL students attempt to take the ITBS/ITED with or without accommodations and thus they will be counted as participating. English language learners who participate in the alternate assessment will be counted in the participation rate and AMO calculations. After implementation of the alternate assessment, students for whom other documentation is provided (and who did not participate in the alternate assessment) will continue to be counted as a part of the exclusion rate.

Based on current federal guidance,

- All ELL will participate in an English language proficiency assessment annually, as per Title III guidelines.
 - For ELL in their first year of enrollment in US schools (defined as up to 180 school days of enrollment):
 - The English language proficiency assessment will constitute their participation in reading for AYP purposes (participation rate calculation).
 - Students will participate in the state's accountability assessment in mathematics, which will constitute their participation in mathematics for AYP purposes (participation rate calculation).
 - These students will not be included in AMO calculations for reading or mathematics in any appropriate membership subgroups (as per US ED guidance).

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
5.5 What is the State's definition of the minimum number of students in a subgroup required for reporting purposes? For accountability purposes?	State defines the number of students required in a subgroup for reporting and accountability purposes, and applies this definition consistently across the State. ⁵ Definition of subgroup will result in data that are statistically reliable.	State does not define the required number of students in a subgroup for reporting and accountability purposes. Definition is not applied consistently across the State. Definition does not result in data that are statistically reliable.

Related to items 3.2a and 5.2, the SEA will be using 10 as the threshold for reporting to the public (as per 281-IAC 12 .8(3)(b)(1)), 40 as the threshold for participation rates in the district-wide assessment system, and 30 as the threshold for the AMO/IG for the reportable groups. Only the scores for those students who have been enrolled for at least one full academic year will be included in the AMO/IG calculations, at the building, LEA, or state levels.

If a subgroup is below the minimum-n for the AMO part of AYP (30), that subgroup will be excluded from the AYP determination (because minimum-n for participation rate (40) for that group is also not met). However, the data from that subgroup will be aggregated at (rolled-up to) the next higher level for participation rate, AMO, and AYP purposes.

If the "all students" group is still less than the minimum-n, SEA will use a 98% confidence interval based on a tdistribution for small samples to determine AYP. For schools falling outside of the confidence band, the SEA will determine if safe harbor provisions, as specified in regulation, will enable such schools to meet AYP.

Student test and participation data used to determine AYP for alternative high schools will roll-up to the district level when:

- 1. The alternative high school enrolls students from a neighboring district(s), as well as their own resident students and
- 2. The minimum-n of resident students at the 11th grade in the "all students" group is less than the 30 required to calculate AMO.

In such a case, the district AYP decision will be attributed to the alternative school.

⁵ The minimum number is not required to be the same for reporting and accountability.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS	
5.6 How does the State Accountability System protect the privacy of students when reporting results and when determining AYP?	Definition does not reveal personally identifiable information. ⁶	Definition reveals personally identifiable information.	
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS			

Currently, when LEAs create their APRs for their communities, they suppress any results that are based on fewer than ten students. The DE will not release any results that identify an individual student. State and local reports will be in compliance with the provisions of FERPA. The SEA will continue to use an n-size of ten for reporting unless it violates confidentiality. Results will also be masked if all students, in the aggregate or within a subgroup, scores fall within one performance level.

⁶ The Family Education Rights and Privacy Act (FERPA) prohibits an LEA that receives Federal funds from releasing, without the prior written consent of a student's parents, any personally identifiable information contained in a student's education record.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
6.1 How is the State's definition of adequate yearly progress based primarily on academic assessments?	Formula for AYP shows that decisions are based primarily on assessments. ⁷ Plan clearly identifies which assessments are included in accountability.	Formula for AYP shows that decisions are based primarily on non-academic indicators or indicators other than the State assessments.

Student proficiency in reading and mathematics are the primary method to determine progress for AYP. Iowa has determined that proficiency for students in reading and mathematics is defined by the performance level descriptors contained in the ITBS and the ITED. These levels will be used to determine AYP determinations for reading and mathematics. These tests are academic assessments that are valid and reliable. Iowa will also determine the objectives for the additional indicators required by NCLB Section 1111 (b)(2)(C)(vi) as part of the annual AYP identification for schools/districts in need of improvement. These additional indicators are graduation and attendance rate.

⁷ State Assessment System will be reviewed by the Standards and Assessments Peer Review Team.

PRINCIPLE 7. State definition of AYP includes graduation rates for public High schools and an additional indicator selected by the State for public Middle and public Elementary schools (such as attendance rates).

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
7.1 What is the State definition for the public high school graduation rate?	 State definition of graduation rate: Calculates the percentage of students, measured from the beginning of the school year, who graduate from public high school with a regular diploma (not including a GED or any other diploma not fully aligned with the state's academic standards) in the standard number of years; or, Uses another more accurate definition that has been approved by the Secretary; and Must avoid counting a dropout as a transfer. Graduation rate is included (in the aggregate) for AYP, and disaggregated (as necessary) for use when applying the exception clause⁸ to make AYP. 	State definition of public high school graduation rate does not meet these criteria.
STATE RESPONSE AND STAT	E ACTIVITIES FOR MEETING REQU	JIREMENTS

⁸ See USC 6311(b)(2)(I)(i), and 34 C.F.R. 200.20(b)

CRITICAL ELEMENT		AMPLES FOR	EXAMPLES OF NOT MEETING REQUIREMENTS			
	n order to use graduation rate as an Other Academic Indicator (OAI) for high school, the IDE will apply a three-year cohort					
	raduation rate, modeled after the NGA compact rate, which is only minimally different (0.9%) from the currently approved NCES eaver rate" for each high school, as defined in Iowa's approved NCLB Accountability Workbook. Of Iowa's 364 school districts, only					
			from the high school graduation rate for the			
			and for all subgroups. For the 2008-2009			
school year, lowa will use the NGA comp	act cohort grad	uation rate determination, which	h tracks students as entering 9th graders			
	chanics of the c	alculations continue to be finalize	zed, and will be implemented for the 2008-			
2009 school year.						
lowa's State Board of Education has ider	ntified a graduat	ion rate of 95% as the end goal	I. The state average for the 2002-2003			
			state average will be expected to increase			
each year. A school or district can meet t			<u> </u>			
 a) Meeting the state target; b) Increasing the graduation 	rate over the p	rovious voor: or				
b) Increasing the graduation	Tale Over the p	levious year, or				
The following targets have been identified	d as annual targ	ets for graduation rates:				
	2002-2003:	89.4%				
	2003-2004:	<mark>89.4%</mark>				
	2004-2005:	<mark>90.3%</mark>				
	2005-2006:	<mark>90.3%</mark>				
	2006-2007:	<mark>90.3%</mark>				
	2007-2008:	<mark>91.3%</mark>				
	2008-2009:	<mark>91.3%</mark>				
	2009-2010:	91.3%				
	2010-2011:	92.2%				
	2011-2012:	93.1%				
	2012-2013:	94.1%				
	2013-2014:	95.0%				
The trajectory defined by these terrets is	agingidant with	the trainestories for the Annual	Measurable Objective (AMO) (achievement			
targets). These targets, like AMOs, will be						
argeis). These largers, like AMOS, WII D	e useu to gauge	the progress for all students, a	as well as for each subgroup.			

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
7.2 What is the State's additional academic indicator for public elementary schools for the definition of AYP? For public middle schools for the definition of AYP?	State defines the additional academic indicators, e.g., additional State or locally administered assessments not included in the State assessment system, grade-to-grade retention rates or attendance rates. ⁹ An additional academic indicator is included (in the aggregate) for AYP, and disaggregated (as necessary) for use when applying the exception clause to make AYP.	State has not defined an additional academic indicator for elementary and middle schools.

The lowa State Board of Education approved an additional indicator for elementary and middle schools on January 16, 2003. This indicator is the average daily attendance rate for elementary and middle school students and also reported by gender, race/ethnicity, socioeconomic status, students with disabilities, and other subgroups as required by state or federal law.

lowa uses the attendance files from the student management information systems (Project EASIER). These calculations are done at the school and district level. Average daily attendance is defined as the aggregate days of student attendance in a school or school district divided by the aggregate days of enrollment. Any LEA whose K-8 attendance rate is less than the state average and has not made progress toward achieving the state average, will work with the Iowa Department of Education to examine school level 4th and 8th grade group and subgroup attendance rates to see if safe harbor applies for AYP determination. Each school and district will be required to report the data on an annual basis and is responsible for making progress toward the state target. If progress is not evident, the state will identify the district as not making AYP and a district will be required to identify a school as not making AYP. If they do not meet AYP for two consecutive years they will be identified as in need of improvement.

⁹ NCLB only lists these indicators as examples.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
7.3 Are the State's academic indicators valid and reliable?	State has defined academic indicators that are valid and reliable. State has defined academic indicators that are consistent with nationally recognized standards, if any.	State has an academic indicator that is not valid and reliable. State has an academic indicator that is not consistent with nationally recognized standards. State has an academic indicator that is not consistent within grade levels.

The DE will review the data submitted by school districts relative to the graduation rate and attendance rates. Iowa Department of Education personnel on an annual basis will audit this evidence.

The graduation rate calculation is consistent with the methodology recommended by the National Center for Education Statistics.

PRINCIPLE 8. AYP is based on reading/language arts and mathematics achievement objectives.

CRITICAL EI	EMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
8.1 Does the state n achievement in reading/languag mathematics sep determining AYF	e arts and parately for	State AYP determination for student subgroups, public schools and LEAs separately measures reading/language arts and mathematics. ¹⁰ AYP is a separate calculation for reading/language arts and mathematics for each group, public school, and LEA.	State AYP determination for student subgroups, public schools and LEAs averages or combines achievement across reading/language arts and mathematics.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

lowa has consistently identified schools for AYP by determining the progress of students separately in reading and mathematics. Districts have been required to report the percentage of students proficient by the tested grade levels and required subgroups for reading and mathematics. Iowa school districts have consistently, over time, used ITBS/ITED data to report district and school proficiency levels. Iowa Code 256.8 and 281-IAC 12.8(3) require separate reporting. In determining whether or not each subgroup, each building, each school district, and the state meets the annual measurable objectives, the percent of students who achieve proficiency in reading and mathematics will be calculated and reported separately.

¹⁰ If the state has more than one assessment to cover its language arts standards, the State must create a method for including scores from all the relevant assessments.

	CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF <i>NOT</i> MEETING REQUIREMENTS
9.1	How do AYP determinations meet the State's standard for acceptable reliability?	State has defined a method for determining an acceptable level of reliability (decision consistency) for AYP decisions. State provides evidence that decision consistency is (1) within the range deemed acceptable to the State, and (2) meets professional standards and practice. State publicly reports the estimate of decision consistency, and incorporates it appropriately into accountability decisions. State updates analysis and reporting of decision consistency at appropriate intervals.	State does not have an acceptable method for determining reliability (decision consistency) of accountability decisions, e.g., it reports only reliability coefficients for its assessments. State has parameters for acceptable reliability; however, the actual reliability (decision consistency) falls outside those parameters. State's evidence regarding accountability reliability (decision consistency) is not updated.

PRINCIPLE 9. State Accountability System is statistically valid and reliable.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

As the new accountability system is implemented, the state will evaluate the accuracy of the AYP decisions made within the current context of school improvement, using information from on-site visits, comprehensive school improvement plans, and Annual Progress Reports (APRs) to the community as collateral evidence. This will help determine if, indeed, the schools that need improvement are those being identified. This will help refine the system as appropriate.

- The state will use annual data and will combine data across grades at a site to reduce sampling error.
- The state will establish a minimum-n size of 30 to balance the statistical reliability and increased inclusion of subgroups. The state will establish a minimum-n size of 40 for participation rate. The state will establish a minimum-n size of 10 for reporting.
- The state will use consecutive years of not making AYP in the same content area (reading or mathematics) and grade level for school identification.
- The state will use consecutive years of not making AYP in the same content area (reading or mathematics) and in either "all students" or one of the subgroups at each of the required grade levels (elementary, middle, high) for district identification.
- The state will use a statistical test to determine the extent to which a group of students is similar (or different) from the target (in terms of proportion of students who are achieving proficiency)
- The state will utilize safe harbor provisions as defined by regulation as appropriate.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF <i>NOT</i> MEETING REQUIREMENTS	
9.2 What is the State's process for making valid AYP determinations?	State has established a process for public schools and LEAs to appeal accountability decision.	State does not have a system for handling appeals of accountability decisions.	
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS The SEA is responsible for identification of LEAs in need of improvement. The LEA is responsible for identification of individual school sites. The ultimate responsibility for the integrity of the data belongs to the LEA and the individual school sites. In order to ensure and maintain a school improvement environment, schools may request a clarification of their identification status at any time. If an LEA desires to appeal an identification, they must be able to provide substantial evidence regarding: 1) extenuating circumstances, 2) dramatic demographic changes, and/or 3) additional evidence regarding student achievement in the content area in question. Appropriate DE staff will review this evidence. A written communication to the LEA superintendent and building principal will provide information regarding status of identification, and further courses of action.			

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF <i>NOT</i> MEETING REQUIREMENTS
9.3 How has the State planned for incorporating into its definition of AYP anticipated changes in assessments?	State has a plan to maintain continuity in AYP decisions necessary for validity through planned assessment changes, and other changes necessary to comply fully with NCLB. ¹¹ State has a plan for including new public schools in the State Accountability System. State has a plan for periodically reviewing its State Accountability System, so that unforeseen changes can be quickly addressed.	State's transition plan interrupts annual determination of AYP. State does not have a plan for handling changes: e.g., to its assessment system, or the addition of new public schools.

Because LEAs have different grade configurations, the configuration of the LEA sites will determine the manner in which AYP will be determined for a specific site or for the LEA as a whole. For example, if an LEA merged its 3rd and 4th grade students into one site, 5th and 6th grade students into another site, and 7th and 8th grade students into yet another site, AYP would be determined for each site using the results for the two tested grades at each site. As such, then any identification would not only be at the building level, but also at the district level. District and State level reporting, however, will be in the traditional grade spans (3-5, 6-8, and 11).

¹¹ Several events may occur which necessitate such a plan. For example, (1) the State may need to include additional assessments in grades 3-8 by 2005-2006; (2) the State may revise content and/or academic achievement standards; (3) the State may need to recalculate the starting point with the addition of new assessments; or (4) the State may need to incorporate the graduation rate or other indicators into its State Accountability System. These events may require new calculations of validity and reliability.

PRINCIPLE 10. In order for a public school or LEA to make AYP, the State ensures that it assessed at least 95% of the students enrolled in each subgroup.

		NOT MEETING REQUIREMENTS
e's method for cipation rates essments for erminations?	State has a procedure to determine the number of absent or untested students (by subgroup and aggregate).	The state does not have a procedure for determining the rate of students participating in statewide assessments.
	State has a procedure to determine the denominator (total enrollment) for the 95% calculation (by subgroup and aggregate). Public schools and LEAs are held accountable for reaching the 95%	Public schools and LEAs are not held accountable for testing at least 95% of their students.
	cipation rates essments for	cipation rates essments for rminations?the number of absent or untested students (by subgroup and aggregate).State has a procedure to determine the denominator (total enrollment) for the 95% calculation (by subgroup and aggregate).Public schools and LEAs are held

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

To calculate participation rates, the state requires each LEA and school to report the total number of all students enrolled on the date of the general ITBS/ITED assessment, by grade level, content area, and subgroup, summed with the total number of students enrolled on the date of the lowa Alternate Assessment. To compute participation rates, the state compares the enrollment counts provided by LEAs with the ITBS/ITED and alternate assessment files used to populate the AYP website files.

The state will collect participation rates at the building level as well as district level. Determining participation rate as part of AYP, lowa will use a minimum size of 40 for all groups and subgroups at a school or district level. A school or district that reports fewer than 95% and has a subgroup of less than 40 will not be considered as failing to meet AYP on the basis of participation rate. The state will require school districts to report participation rates that include students whose scores are returning to the resident district (as described in section 1.1).

	CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF <i>NOT</i> MEETING REQUIREMENTS
	What is the State's policy for determining when the 95% assessed requirement should be applied?	State has a policy that implements the regulation regarding the use of 95% allowance when the group is statistically significant according to State rules.	State does not have a procedure for making this determination.
STAT	STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

School buildings and districts will be required to report participation rates for students included in the ITBS, the ITED, and alternate assessments for students with disabilities. School buildings and districts that meet the 95% participation rate will meet that AYP requirement. If a school or district meets the minimum n of 40 and does not meet 95% participation rate for two consecutive years they will be identified as a school or district in need of improvement. If a subgroup is less than 40 and there is a participation rate of less than 95%, then the AYP decision based on participation rate will not apply to that school or district.

APPENDICES

Appendix A: The Iowa Model

Appendix B: Annual Measurable Objectives

Appendix A

The lowa Model

Neither the "Catch up" model nor the "Equal contribution" model fulfills the purposes of holding all schools accountable for improvement, considering equity in the application of adequate yearly progress, and ensuring 100% proficiency by 2013-2014. Therefore, Iowa is proposing a model that the state believes fulfills the intent of NCLB, while integrating the provisions of NCLB into the state's current accountability system.

lowa calls this model a "Relative contribution" model. It is characterized by identifying each LEA whose percent proficient for the "all students" group is above the state's trajectory, establishing a trajectory that will ensure achieving 100% proficiency by 2013-2014, and comparing the change in percent of proficient to the state's trajectory and to their own trajectory. For any subgroup whose proficiency percentage falls below the state's trajectory, the NCLB AYP decision process will take precedence. In this way, an LEA must first meet the state's trajectory for NCLB for all subgroups, and then meet their own trajectory for lowa regulations.

Because NCLB stipulates a status model, the change in status for lowa is a function of how many *more* students (percent) need to achieve proficiency than achieved proficiency the previous year. To stipulate the "same" number is to apply formulas that are fundamentally inequitable. Iowa has chosen to achieve "sameness" for LEAs achieving above the state's trajectory by applying the same formula to each such LEA. Local education agencies then may, for schools that are above the state's trajectory, apply the LEA's trajectory to all schools within the LEA, or calculate the "relative contribution" of each school building toward the LEA's trajectory. As such, uniform application of the trajectory formula will continue to expect lower performing schools to "make up" more ground (in order to reach the state's trajectory) than higher achieving schools.

To illustrate this model, consider the following: If the state's goal is 5% a year for the 12-year period (40% proficient), a school that has 24% nonproficient students (76% proficient) would need to move 2% to the proficient level (or one student if the percentage yielded a fraction of a student) each year for 12 years. Any school with less than 40% proficiency (for any subgroup) would be expected to reach the state's trajectory (NCLB precedence). Each LEA's and building's trajectory goals could be set in the same way. While the percentage of change expected is not the same for each district, the formula is applied in the same way for all schools and districts. It is more equitable, such that those with the greatest number of proficiency within the timeline. This model reflects the intent of NCLB when the other two models do not, and in fact, is more rigorous for all schools, specifically for the high performing schools that are already achieving above the state's trajectory.

Appendix B

STATE PERFORMANCE TARGETS (ANNUAL MEASURABLE OBJECTIVES & INTERMEDIATE GOALS) (ANNUAL DATA)

Mathematics										
YEAR	G3	G4	G5	G6	G7	G8	G11			
2001-02	60.9	62.0	64.9	59.2	58.0	58.0	69.0			
2003	60.9	62.0	64.9	59.2	58.0	58.0	69.0			
2004	60.9	62.0	64.9	59.2	58.0	58.0	69.0			
2005	67.4	68.3	70.8	66.0	65.0	65.0	74.2			
2006	67.4	68.3	70.8	66.0	65.0	65.0	74.2			
2007	67.4	68.3	70.8	66.0	65.0	65.0	74.2			
2008	73.9	74.7	76.6	72.8	72.0	72.0	79.3			
2009	73.9	74.7	76.6	72.8	72.0	72.0	79.3			
2010	73.9	74.7	76.6	72.8	72.0	72.0	79.3			
2011	80.5	81.0	82.5	79.6	79.0	79.0	84.5			
2012	87.0	87.3	88.3	86.4	86.0	86.0	89.7			
2013	93.5	93.7	94.2	93.2	93.0	93.0	94.8			
2014	100.0	100.0	100.0	100.0	100.0	100.0	100.0			

Reading									
YEAR	G3	G4	G5	G6	G7	G8	G11		
2001-02	61.2	64.0	64.6	54.5	57.3	60.0	69.0		
2003	61.2	64.0	64.6	54.5	57.3	60.0	69.0		
2004	61.2	64.0	64.6	54.5	57.3	60.0	69.0		
2005	67.7	70.0	70.5	62.1	64.4	66.7	74.2		
2006	67.7	70.0	70.5	62.1	64.4	66.7	74.2		
2007	67.7	70.0	70.5	62.1	64.4	66.7	74.2		
2008	74.1	76.0	76.4	69.7	71.5	73.3	79.3		
2009	74.1	76.0	76.4	69.7	71.5	73.3	79.3		
2010	74.1	76.0	76.4	69.7	71.5	73.3	79.3		
2011	80.6	82.0	82.3	77.3	78.7	80.0	84.5		
2012	87.1	88.0	88.2	84.8	85.8	86.7	89.7		
2013	93.5	94.0	94.1	92.4	92.9	93.3	94.8		
2014	100.0	100.0	100.0	100.0	100.0	100.0	100.0		