



# UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

JAN 8 2009

The Honorable Hank M. Bounds  
Superintendent  
Mississippi Department of Education  
P. O. Box 771  
Jackson, Mississippi 39205-0771

Dear Superintendent Bounds:

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

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

- **Assessment system:** An assessment system that produces valid and reliable results is fundamental to an accountability system that holds schools and districts accountable for educating all students. Information regarding both the reading/language arts and mathematics assessment system used in determining adequate yearly progress for schools and districts in your state as well as details of the 2007–08 administration of science assessments are attached.
- **Accountability components:** The Department's new Title I regulations provide for greater scrutiny to states' accountability systems, including establishing a uniform and more accurate measure of calculating high school graduation rate that is comparable across states and requiring that states ensure that statistical measures maximize the inclusion of students and student subgroups in accountability determinations. Hence, the regulations also require that all states submit portions of their Accountability Workbook for peer review. In the attachment to this letter you will find information on Mississippi's minimum group size, annual measurable objectives, confidence interval, full academic year definition, and graduation rate.
- **Departmental flexibilities:** Over the past several years, the Secretary has offered several flexibilities to states, such as growth model and differentiated accountability pilots, assessing students with disabilities and recently arrived limited English proficient students, and discretionary grant programs, such as the Teacher Incentive Fund, Enhanced Assessment Grants, and State Longitudinal Data System Grants. I am pleased to note that Mississippi is participating in several of these endeavors.
  - **General Supervision Enhancement Grant (GSEG):** Mississippi is working towards the development of an alternate assessment based on alternate academic achievement standards. (Year 1: \$395,863.09; Year 2: \$299,571.41; and Year 3: \$281,981.41).

In addition, for your information, I am enclosing a file that provides information across all states on the current assessment status, participation in flexibilities offered by the Department, AYP information, and

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discretionary grants. I wish you continued success in raising the achievement in Mississippi. NCLB has focused our attention on closing achievement gaps and increasing the awareness of those students who have often been left behind: economically disadvantaged, limited English proficient, and students with disabilities. I have enjoyed the opportunity to work with you and all your colleagues across the country on such important issues.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kerri L. Briggs".

Kerri L. Briggs, Ph.D.

Enclosures

cc: Governor Haley Barbour  
Kris Kaase  
Steve Hebbler

## Assessment System

Your assessment system has been designated *Approval Pending*. This means that Mississippi's assessment system does not include fully compliant assessments in grades 3-8 and high school in reading/language arts and mathematics. Mississippi recently entered into a Memorandum of Agreement with the Department regarding its plan and timeline to complete work on its reading/language arts and mathematics assessments. I encourage you to consider whether there are any areas in which the Department can provide or facilitate technical assistance to Mississippi in meeting the statutory or regulatory requirements or as you consider changes to your current assessment system.

- I know that Mississippi submitted evidence regarding your general and alternate reading and math assessments for review from October 25 through November 2. My staff will be sharing the peer notes and formal feedback as soon as possible. Enclosed with this letter is the most recent list of evidence that Mississippi must submit from the letter I sent you on June 13, 2008.
- Mississippi's science assessments are not yet fully compliant.
  - In 2007–08, the Department required that the state meet four minimal criteria related to the content area of science: have science content standards; have a general and alternate science assessment; include all students in one of the science assessments (i.e., either the general or alternate); and report the results of the science assessments. Mississippi has not yet met these requirements.
  - In 2008–09, the Department will conduct peer reviews of science assessments and expects the assessments to be fully compliant. Mississippi must submit evidence of its science assessments for the peer review on March 23-27, 2009. Evidence for this review is due three weeks prior to the review. Beginning with the 2008–09 school year, science assessments will be included in the states' assessment status. For additional detail, please see the enclosed fact sheet.

## Accountability System

- Minimum group size (the state-defined minimum number of students necessary to have valid and reliable AYP determinations): Mississippi's minimum group size is 40 students. (The average across all states is approximately 30 students.)
- Annual measurable objectives (AMO) (the yearly target for the percentage of students required to be proficient or above for a school to make AYP):
  - 2008–09: Mississippi's goals for this year are:

Subject	Grade	AMO
Math	3	56%
	4	55%
	5	53%
	6	53%
	7	53%
	8	49%
Algebra I	8	85%
	9	55%
	10	43%
	11	36%
Reading	3	53%
	4	50%
	5	50%
	6	49%
	7	46%
	8	48%

	High School	49%
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- AMO type: Mississippi set its AMOs consistent with the statutory requirements, using a stair-step method. This means that AMOs increase in equal increments every two years.
- Confidence interval: The state uses a confidence interval of 99 percent.
- Full academic year definition (for purposes of determining whether a student’s score must be included in AYP determinations): In Mississippi, a student must be enrolled in the same school on six of seven “end of month” records in order to be included in AYP determinations.
- Graduation rate:
  - Currently, Mississippi is using a graduation rate that can be described as a longitudinal cohort rate, meaning that it divides the number of students that graduated by the number of 1st-time entering 9th graders four years previously, accounting for transfers in and out and deaths. This is similar to the graduate rate states will be required to report beginning in the 2010–11 school year.
  - As required by the recently issued Title I regulations, states must report graduation rate data, in the aggregate and disaggregated by subgroup, using the four-year adjusted cohort graduation rate beginning with report cards providing assessment results for the 2010-11 school year.
  - The graduation rate target Mississippi requires for the district or school to make AYP is 72 percent or improvement from the previous year.
  - According to the National Governor’s Association 2008 report *Implementing Graduation Counts: State Progress to Date, 2008*, Mississippi had the capability to calculate the NGA Compact 4-year graduation rate in 2006.
- Mississippi uses a performance index. It uses three levels: proficient and advanced students receive 1.0 points; students scoring at basic receive 0.5 points; and students scoring “minimal” receive 0 points. Mississippi based its AMOs on the performance index.

## **SUMMARY OF ADDITIONAL EVIDENCE REGARDING MISSISSIPPI'S ALTERNATE ASSESSMENTS THAT MISSISSIPPI MUST SUBMIT TO MEET ESEA REQUIREMENTS FOR THE MISSISSIPPI ASSESSMENT SYSTEM**

**NOTE: The following list of evidence pertains to the Mississippi alternate assessments based on alternate academic achievement standards, the MAAECF and the High School Alternate Assessment.**

### **1.0 – ACADEMIC CONTENT STANDARDS**

1. Documentation showing stakeholder diversity, especially expertise in students with disabilities and limited English proficiency, in the panels that developed the frameworks in language arts, mathematics and science.

### **2.0 – ACADEMIC ACHIEVEMENT STANDARDS**

1. Evidence that the state has approved/adopted alternate academic achievement standards in reading/language arts and mathematics for each of grades 3 through 8 and high school.
2. Evidence that the academic achievement standards include, for each content area:
  - a. At least three levels of achievement, including two levels of high achievement (proficient and advanced) that determine how well students are mastering a State's academic content standards, and a third level of achievement (basic) to provide information about the progress of lower-achieving students toward reaching the proficient and advanced levels of achievement;
  - b. Descriptions of the competencies associated with each achievement level; and
  - c. Assessment scores ("cut scores") that differentiate among the achievement levels.
3. Evidence that the state has documented the involvement of diverse stakeholders in the development of its alternate achievement standards.

### **4.0 – TECHNICAL QUALITY**

1. Has the state documented the issue of validity (in addition to the alignment of the assessment with the content standards), as described in the Standards for Educational and Psychological Testing (AERA/APA/NCME, 1999), with respect to all of the following categories:
  - a. Has the state specified the purposes of the assessments, delineating the types of uses and decisions most appropriate to each? Has the state ascertained that the decisions based on the results of its assessments are consistent with the purposes for which the assessments were designed?; and
  - b. Has the state ascertained whether the assessment system produces intended and unintended consequences?
2. For each assessment:
  - a. Has the state ascertained that the scoring and reporting structures are consistent with the subdomain structures of its academic content standards (i.e., are item interrelationships consistent with the framework from which the test arises)?;
  - b. Has the state ascertained that test and item scores are related to internal or external variables as intended (e.g. scores are correlated strongly with relevant measures of academic achievement and are weakly correlated, if at all, with irrelevant characteristics, such as demographics)?; and
  - c. For each assessment, provide documentation of the standards-setting process. Describe the selection of judges, methodology employed, and final results.

3. For each assessment, has the state considered the issue of reliability, as described in the Standards for Educational and Psychological Testing (AERA/APA/NCME, 1999), with respect to all of the following categories:
  - a. Has the state determined the reliability of the scores it reports, based on data for its own student population and each reported subpopulation?;
  - b. For all assessments, has the state reported the conditional standard error of measurement and student classification that are consistent at each cut score specified in its academic achievement standards?; and
  - c. Has the state reported evidence of generalizability for all relevant sources, such as variability of groups, internal consistency of item responses, variability among schools, consistency from form to form of the test, and inter-rater consistency in scoring?
4. Evidence that the state has ensured that its assessment system is fair and accessible to all students, including students with disabilities and students with limited English proficiency, including a DIF analysis or bias review of items to ensure fairness in the development of the assessments.
5. When different test forms or formats are used, evidence that the state has taken steps to ensure consistency of test forms over time to ensure that the meaning and interpretation of results are consistent.
6. Evidence of a system for monitoring and improving the on-going quality of its assessment system.
7. Evidence that the state has evaluated its use of accommodations.

## **5.0 – ALIGNMENT**

1. Documentation of the alignment of student work on the alternate assessments with the extended curriculum frameworks.
2. Evidence that the state has developed ongoing procedures to maintain and improve alignment between the alternate assessments and standards over time, particularly if gaps have been noted.

## **SUMMARY OF ADDITIONAL EVIDENCE REGARDING MISSISSIPPI'S GENERAL ASSESSMENTS THAT MISSISSIPPI MUST SUBMIT TO MEET ESEA REQUIREMENTS FOR THE MISSISSIPPI ASSESSMENT SYSTEM**

**NOTE: The following list of evidence pertains to the Mississippi general assessments, the MCT2 and the MSATP.**

## **2.0 – ACADEMIC ACHIEVEMENT STANDARDS**

1. Evidence that the state has approved/adopted academic achievement standards in reading/language arts and mathematics for each of grades 3 through 8 and high school.
2. Evidence that the academic achievement standards include, for each content area:
  - a. At least three levels of achievement, including two levels of high achievement (proficient and advanced) that determine how well students are mastering a state's academic content standards, and a third level of achievement (basic) to provide information about the progress of lower-achieving students toward reaching the proficient and advanced levels of achievement;
  - b. Descriptions of the competencies associated with each achievement level; and
  - c. Assessment scores ("cut scores") that differentiate among the achievement levels.
3. Evidence that the state has documented the involvement of diverse stakeholders in the development of its achievement standards.

### 3.0 – FULL ASSESSMENT SYSTEM

1. Documentation of the results of alignment studies of the assessments to show higher-order thinking skills.

### 4.0 - TECHNICAL QUALITY

1. Has the state documented the issue of validity (in addition to the alignment of the assessment with the content standards), as described in the Standards for Educational and Psychological Testing (AERA/APA/NCME, 1999), with respect to all of the following categories:
  - a. Has the state specified the purposes of the assessments, delineating the types of uses and decisions most appropriate to each? Has the State ascertained that the decisions based on the results of its assessments are consistent with the purposes for which the assessments were designed?; and
  - b. Has the state ascertained whether the assessment system produces intended and unintended consequences?
2. For each assessment:
  - a. Has the state ascertained that the scoring and reporting structures are consistent with the subdomain structures of its academic content standards (i.e., are item interrelationships consistent with the framework from which the test arises)?;
  - b. Has the state ascertained that test and item scores are related to internal or external variables as intended (e.g., scores are correlated strongly with relevant measures of academic achievement and are weakly correlated, if at all, with irrelevant characteristics, such as demographics)?; and
  - c. For each assessment, provide documentation of the standard setting process. Describe the selection of judges, methodology employed, and final results.
3. For each assessment, has the state considered the issue of reliability, as described in the Standards for Educational and Psychological Testing (AERA/APA/NCME, 1999), with respect to all of the following categories:
  - a. Has the state determined the reliability of the scores it reports based on data for its own student population and each reported subpopulation?;
  - b. For all assessments, has the state reported the conditional standard error of measurement and student classification that is consistent at each cut score specified in its academic achievement standards?; and
  - c. Has the state reported evidence of generalizability for all relevant sources, such as variability of groups, internal consistency of item responses, variability among schools, consistency from form to form of the test, and inter-rater consistency in scoring?
4. Has the state ensured that its assessment system is fair and accessible to all students, including students with disabilities and students with limited English proficiency, with respect to each of the following issues:
  - a. Has the state ensured that the assessments provide an appropriate variety of accommodations for students with disabilities?;
  - b. Has the state ensured that the assessments provide an appropriate variety of linguistic accommodations for students with limited English proficiency?;
  - c. Has the state taken steps, such as DIF analysis or bias review of items, to ensure fairness in the development of the assessments?; and
  - d. Does the use of accommodations and/or alternate assessments yield meaningful scores?
5. When different test forms or formats are used, the state must ensure that the meaning and interpretation of results are consistent.
  - a. Has the state taken steps to ensure consistency of test forms over time?; and

- b. If the state administers both an online and paper and pencil test, has the state documented the comparability (achievement level for individual student) of the electronic and paper forms of the test?
6. Does the state have a system for monitoring and improving the on-going quality of its assessment system?
7. Has the state evaluated its use of accommodations?
  - a. How has the state determined that scores for students with disabilities that are based on accommodated administration conditions will allow for valid inferences about these students' knowledge and skills and can be combined meaningfully with scores from non-accommodated administration conditions?
8. If appropriate accommodations are available to limited English proficient students has the state documented that these accommodations are used to yield accurate and reliable information about what limited English proficient students know and can do? Does the state monitor availability of accommodations during test administration?
9. How has the state determined that scores for limited English proficiency students that are based on accommodated administration circumstances will allow for valid inferences about these students' knowledge and skills and can be combined meaningfully with scores from non-accommodated administration circumstances?
10. What actions has the state taken to monitor the implementation of accommodations during testing?

## **5.0 – ALIGNMENT**

1. What ongoing procedures does the state use to maintain and improve alignment between the assessments and standards over time, particularly if gaps have been noted?
2. Are the assessments and the standards aligned comprehensively, meaning that the assessments reflect the full range of the state's academic content standards? Are the assessments as cognitively challenging as the standards? Are the assessments and standards aligned to measure the depth of the standards? Do the assessments reflect the degree of cognitive complexity and level of difficulty of the concepts and processes described in the standards?
3. Do the assessments reflect both the content knowledge and procedural or process skills (such as the application of knowledge to solve problems, or understanding of scientific method) as represented in the state's academic content standards?
4. Do the assessments reflect the same degree and pattern of emphasis as are reflected in the state's academic content standards?
5. Has the state provided detailed assessment specifications and/or a description of the test development process to illustrate how the assessment system reflects both the content knowledge and skills specified in the academic achievement standards? For instance, if the standards require "writes in different genres," does the assessment require writing samples from different genres?

## **6.0 – INCLUSION**

1. Evidence that shows that all students in the grades tested are included in the assessment system (e.g., students with disabilities, students with limited English proficiency, economically disadvantaged students, all race/ethnicity groups, migrant students, homeless students, etc.).

## **7.0 – REPORTING**

1. Evidence that the state's reporting system facilitates appropriate, credible, and defensible interpretation and use of its assessment data.



2. Evidence that the state has provided, for each content area, grade and subgroup, a summary report that includes the number of students enrolled or number tested/not tested as evidence that all students are tested.
3. Evidence that the state has provided final copies of individual interpretive, descriptive, and [non-clinical] diagnostic reports that indicate relative strengths and instructional needs.