



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

JUN 10 2008

The Honorable Alice Seagren  
Commissioner  
Minnesota Department of Education  
1500 Highway 36 West  
Roseville, Minnesota 55113

Dear Commissioner Seagren:

Thank you for submitting a proposal for the U.S. Department of Education's (Department) growth-based accountability model pilot project. I appreciate the work you and your staff have done to participate in this effort so far. The Department continues to believe that this pilot project can help determine whether growth models will, most importantly, provide a fair, reliable, and innovative mechanism for holding schools accountable for ensuring that all students reach grade-level standards in reading and mathematics by 2013–14.

As you know, a panel of peer experts reviewed Minnesota's growth model on April 24-25, 2008. During this review, the peers raised a number of substantive concerns with the structure of Minnesota's model. The peers identified several strengths in Minnesota's proposal, noting, for example, that the approach you proposed would be easily understood by the public and professional educators and that Minnesota plans to evaluate its growth model against models currently used in several districts in the state. However, the peers noted specific concerns with several fundamental components of Minnesota's proposed model. Specifically, the peers were concerned about the "compounding growth" component of the Minnesota value table and the rationale and justification for the values in that table. More specifically, the value table would allow students to maintain their same performance level but to receive points for progress toward proficiency. I am enclosing a copy of the peer report for your consideration.

Based on the significance of the peers' concerns, the Department has decided not to approve Minnesota's proposal for implementation in the 2007–08 school year. I anticipate, however, that there will be other opportunities for Minnesota to implement a growth model in the future. The Department's recently released notice of proposed regulations would codify the existing growth model pilot in regulations. Moreover, the Department is planning to convene another peer review of state growth model proposals this fall and I invite Minnesota to consider the peer reviewers' feedback and submit a revised proposal for that review. The heart of the peers' concerns relates to the interaction of Minnesota's existing performance index with the value table. The Department has concerns about the appropriateness of allowing a state to include both a performance index and a growth model in its accountability system. I will task the Department's recently announced National Technical Advisory Council to review this issue and provide feedback on if, and when, it may be reasonable for a state to include both components in its accountability system. We will provide additional guidance on this question this summer so

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that Minnesota may take this guidance into account when developing a revised proposal. If Minnesota's subsequent proposal is successful, and assuming Minnesota's assessment system as administered in 2008–09 meets all requirements, Minnesota's growth model could be approved for implementation for the 2008–09 AYP determinations. More information about this next round of review will be forthcoming. I urge you to consider carefully the peer reviewers' feedback as you work to refine your growth model for the future. My staff and I are available to discuss the peers' concerns with you to help refine and improve your model.

Again, I appreciate your interest in the growth model pilot project and your continued efforts to ensure quality education for all children.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Briggs', written over a faint, illegible typed name.

Kerri L. Briggs, Ph.D.

Enclosure

cc: Governor Tim Pawlenty  
Christy Hovanetz-Lassila