



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

JUL 10 2007

The Honorable Lyonel Tracy
Commissioner of Education
New Hampshire Department of Education
101 Pleasant Street
Concord, New Hampshire 03301

Dear Commissioner Tracy:

Thank you for submitting a proposal for the U.S. Department of Education's (Department) growth-based accountability pilot project. I appreciate the work you and your staff put into your proposal. The Department continues to believe that this pilot project can help determine whether growth models represent a fair and reliable way to hold schools accountable while supporting the ultimate goal of all students proficient by 2013–14.

As you know, the Department submitted New Hampshire's proposal to a group of peer reviewers who evaluated it on March 15-16, 2007, and again on May 4, 2007. During these reviews, the peers raised a number of substantive concerns. Specifically, the peers noted concerns with the technical structure of New Hampshire's proposed model. During the March 15-16 review, the peers noted several inconsistencies in the formulas used to determine student growth targets. As a result, the peers requested New Hampshire provide all the statistical models and procedures required to operationalize its model. During the May 4 review of New Hampshire's revised proposal, there remained inconsistencies between the policy goals stated in the narrative of the proposal and the mathematical mechanics. For example, the proposal stated that a student scoring one standard deviation below proficient has three years to reach proficiency. However, according to Table 7 in the proposal, a student who scores 300 in grade 3 could meet the projected growth target every year and not reach proficiency until grade 11. In this and several other instances, the actual number of years it takes to achieve proficiency as shown in Table 7 does not match the number of years in the narrative of the proposal. (Please refer to the enclosed peer report for details.)

Following the second peer review, the Department offered an opportunity for New Hampshire to meet with Department staff and several peer reviewers. This meeting would have provided an opportunity for New Hampshire to further explain its model and to address the peers' concerns. If New Hampshire had been able to address the peers' concerns, the Department was prepared to approve New Hampshire to implement its growth model for the 2006–07 school year. Unfortunately, New Hampshire declined this opportunity. Consequently, the Department cannot approve New Hampshire's proposal.

As you review the peer reports for the two rounds of review, please note that the peers identified several strengths in the New Hampshire proposal, particularly the model's use of standard deviation units to set growth targets for students. The peers commended New Hampshire for including in its growth model students who are currently proficient but whose performance is decreasing. The peers also noted that New Hampshire's match rates for individual students is quite high, accounting for all but 1-2 percent of students.

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While the Department is unable to approve New Hampshire's growth model for the 2006-07 school year, I anticipate that there will be other opportunities for New Hampshire to implement a growth model. As noted in *Building on Results: A Blueprint for Strengthening the No Child Left Behind Act*, the Department's reauthorization proposal would permit States to include a growth model to measure adequate yearly progress, provided the model is approved by the Department. I urge you to consider carefully the peer reviewers' feedback if you decide to refine your growth model for the future. Please let me know if you would like technical assistance from a member of the peer review panel. As always, my staff and I are available to further discuss the peers' concerns and the Department's decision.

Sincerely,

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

Kerri L. Briggs, Ph.D.

Enclosure

cc: Governor John Lynch
Tim Kurtz