



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

JUN 25 2009

Honorable Kerri Briggs, Ph.D.
State Superintendent of Education
441 4th Street NW
Suite 350 North
Washington, DC 20001

Dear Superintendent Briggs:

Congratulations on your new role. We wish you the best in working on behalf of students, teachers, and families in the District of Columbia. Thank you for submitting additional assessment materials for peer review under the standards and assessment requirements of the *Elementary and Secondary Education Act of 1965* (ESEA), as amended. We appreciate the efforts that were required to prepare for the latest peer review that occurred in April 2009.

As you know, the District of Columbia entered into a memorandum of agreement (MOA) with the Department on October 3, 2008 because of the outstanding issues with the District of Columbia's general assessments in reading/language arts and mathematics. In the MOA, we enumerated the evidence required for the District of Columbia's standards and assessments for reading and mathematics to be fully approved. In addition to providing the evidence required by the MOA, the District of Columbia was also obligated to submit evidence regarding its science standards and assessments for peer review in 2008–09. Outside peer reviewers and Department staff have evaluated the District of Columbia's science submission. On the basis of the peer review, I have determined that the District of Columbia's general assessments and alternate assessments based on alternate academic achievement standards in science for grades 5, 8 and high school do not meet all the statutory and regulatory requirements of section 1111(b)(1) and (3) of the ESEA. Specifically, I cannot approve the standards and assessment system due to the lack of required evidence in several areas, primarily technical quality, alignment, inclusion and reports. The enclosed list provides greater detail about the evidence the District of Columbia must submit to the Department to demonstrate full compliance.

In addition, I have also enclosed detailed comments from the peer review team that evaluated the District of Columbia's submission, which I hope will help you in gathering the additional required evidence.

Please note that, notwithstanding these concerns, the District of Columbia may include the results of its reading and mathematics general assessments and alternate assessments based on alternate academic achievement standards in adequate yearly progress (AYP) determinations for the 2008-2009 school year, so long as the percentage of proficient and advanced scores on the alternate assessment based on alternate achievement standards does not exceed 1.0 percent of all students in the grades assessed at the district or state level.

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The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

Because the District of Columbia was not able to demonstrate that its general standards and assessments and alternate assessments based on alternate academic achievement standards are fully compliant, the District of Columbia's standards and assessment system remains *Approval Pending* and the condition on the District of Columbia's Title I, Part A grant award will continue. In addition, the District of Columbia remains obligated to comply with the terms of its MOA.

I appreciate the steps the District of Columbia has taken toward meeting the requirements of the ESEA, and I know you are eager to receive full approval of your standards and assessment system. We are committed to helping you accomplish that goal and remain available to provide technical assistance. We will schedule a peer review, either in the fall of 2009 or earlier, if you have evidence available to further evaluate your system. If you have any questions or would like to discuss this further, please do not hesitate to contact Sue Rigney (sue.rigney@ed.gov) of my staff.

Sincerely,

Joseph C. Conaty
Delegated Authority to Perform the Functions and
Duties of the Assistant Secretary for Elementary
and Secondary Education

Enclosures

cc: Alex Harris

SUMMARY OF ADDITIONAL EVIDENCE THAT THE DISTRICT OF COLUMBIA MUST SUBMIT TO MEET ESEA REQUIREMENTS FOR DISTRICT OF COLUMBIA STANDARDS AND ASSESSMENT SYSTEM

3.0 FULL ASSESSMENT SYSTEM

1. Clarification of the DC CAS test design with appropriate technical documentation of equivalent forms. (3.3)
2. Documentation showing that both the DC CAS and DC CAS-Alt science assessments include challenging academic content appropriate to the student population tested. (3.6)

4.0 TECHNICAL QUALITY

1. A plan and timeline to examine consequential validity (4.1g)
2. Correlations of test and item data with external variables such as demographics. (4.1e)

DC CAS:

1. Subgroup reliabilities. (4.2a)
2. The scoring rubrics for science constructed-response items, state standards and procedures to ensure reliable scoring. (4.5)
3. Documentation of actions taken to date that shows the implementation of the DC improvement plan (document 52) and the results of the implementation. (4.5)
4. The results of the analyses planned for 2009 to evaluate the use of accommodations for limited English proficient (LEP) students. (4.6d)
5. A plan and a timeline for how DC will use the results of the data collected during monitoring to assure that appropriate accommodations are delivered during testing for students with disabilities (SWD) and LEP students. (4.6 a, 4.6c)
6. A plan and timeline for a study to confirm that use of accommodations on the science test yields meaningful scores for SWD and LEP students. (4.6b, 4.6d)
7. A detailed description of the item and test forms development procedure that includes:
 - a. A long-term test development plan that specifies field-test design, item development/acquisition procedures, and equating plan to support the development of test forms that are comparable.
 - b. Detailed test blueprints for grades 5 and 8 and for high school Biology that support the development of test forms that are comparable over time and that sample all of the relevant science standards. (4.1)

DC CAS-Alt:

1. Results from the planned decision consistency study. (4.2)
2. Documentation confirming that the state has implemented procedures (such as the ones listed in the Alternate Technical Manual on page 88) to ensure the consistency of scores over time. (4.4)

5.0 ALIGNMENT

DC CAS:

1. A plan and timeline for ensuring complete alignment of the science assessments and the content and achievement standards. (5.1)
2. Item specifications used to guide item writing (item content, format and scoring criteria). (5.1)
3. Procedures and rationale for item selection. (5.1)

DC CAS-Alt:

1. A clearly defined policy for teacher selection of prioritized skills for the DC CAS-Alt so that there is assurance that students do not repeat the same skills over time. (5.2)

6.0 INCLUSION

1. Documentation that parents are informed that their child's achievement will be based on alternate academic achievement standards and of any possible consequences resulting from local educational agency (LEA) or State policy (e.g., ineligibility for a regular high school diploma)]. (6.2.2(d))
2. Documentation that DC reports separately the number and percent of students with disabilities assessed on the regular assessment without accommodations, on the regular assessment with accommodations, and on the alternate assessment against alternate academic achievement standards. (6.1.2)
3. Data confirming participation of all high school students in the Biology test (DC CAS or DC CAS-Alt) at some point in their high school career. (6.1)
4. Evidence of clarification to the field that students may not participate in the DC CAS-Alt on the basis of a 504 plan. (6.2.2)

7.0 REPORTING

1. Actual reports that address all requirements in this section, including:
 - a. School, district and state summary reports that include results for all required reporting subgroups as well as the number enrolled and the number tested/not tested; (7.2)
 - b. An individual student report that includes results expressed as achievement levels with appropriate explanation of the meaning of the achievement levels accompanied by a detailed interpretive guide for parents in a language that is understandable to them; (7.1, 7.3)
 - c. Evidence that test results will be delivered to parents and educators as soon as possible after the assessment is completed (7.3); and
 - d. Itemized score analyses by subdomain or standards that provide useful instructional information to educators. (7.5)
2. Evidence that DC ensures that student-level assessment data are maintained securely to protect student confidentiality. (7.4)