



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

JUN 29 2009

The Honorable Tom Horne  
Superintendent of Public Instruction  
Arizona Department of Education  
1535 West Jefferson Street, Bin 2  
Phoenix, Arizona 85007

Dear Superintendent Horne:

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 March 2009.

In a letter to you on June 30, 2006, we approved your standards and assessment system with recommendations. However, since that time, you implemented new science standards and assessments. Outside peer reviewers and Department staff have evaluated Arizona's submission. Based on that review, I have determined that Arizona's general science assessments still do not meet all the statutory and regulatory requirements of section 1111(b)(1) and (3) of the ESEA. Specifically, I cannot approve these assessments due to issues of technical quality and alignment. Moreover, absent these concerns, I could not approve Arizona's full standards and assessment system because Arizona submitted no evidence regarding its alternate science assessment based on alternate academic achievement standards. The enclosed list provides greater detail about the evidence Arizona must submit to the Department to demonstrate full compliance of its general assessments for science. In addition, I have also enclosed detailed comments from the peer review team that evaluated Arizona's submission, which I hope will help you in gathering the additional required evidence.

Because Arizona was not able to demonstrate that its general science standards and assessments and alternate assessment based on alternate academic achievement standards for science are fully compliant, Arizona's standards and assessment system is now designated *Approval Pending* and a condition will be placed on Arizona's Title I, Part A grant award. In addition, Arizona is now under Mandatory Oversight, as authorized under 34 C.F.R. § 80.12. Accordingly, Arizona must submit a timeline demonstrating how it will complete the work necessary to implement a fully compliant standards and assessment system in the 2009–10 school year and must submit quarterly reports regarding its progress along that timeline. Arizona may request reconsideration of its Mandatory Oversight status by submitting in writing to me, within 10 days of receipt of this letter, the reasons Arizona believes this status is not justified.

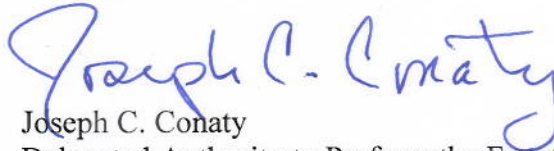
I appreciate the steps Arizona has taken toward meeting the requirements of the ESEA, and I know you are eager to receive full approval of your standards and assessment system. We are

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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 Clayton Hollingshead of my staff at [clayton.hollingshead@ed.gov](mailto:clayton.hollingshead@ed.gov).

Sincerely,



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

Enclosure

cc: Jan Brewer  
Roberta Alley

## **SUMMARY OF ADDITIONAL EVIDENCE THAT ARIZONA MUST SUBMIT TO MEET ESEA REQUIREMENTS FOR ARIZONA'S SCIENCE STANDARDS AND GENERAL ASSESSMENT FOR SCIENCE**

### **3.0 FULL ASSESSMENT SYSTEM**

1. The State must provide evidence demonstrating that the general science assessment measures higher-order thinking skills and understanding of challenging content (3.6).

### **4.0 TECHNICAL QUALITY**

1. The State must provide evidence that it has ascertained that the scoring and reporting structures for the general science assessment are consistent with the subdomain structures of its academic content standards (*i.e.*, item interrelationships are consistent with the framework from which the test arises) (4.1(d)).
2. The State must provide evidence that it has ascertained whether the general science assessment produces intended and unintended consequences (4.1(g)).
3. The State must provide evidence of having determined the reliability of the scores and subdomain scores for the general science assessment that it reports based on data for its own student population and for each reported subpopulation (4.2(a)).
4. The State must provide evidence that it has ensured that appropriate accommodations are available for the general science assessment to LEP students, students with disabilities and students covered by Section 504, and that these accommodations are used in a manner that is consistent with instructional approaches for each student, as determined by a student's IEP or 504 plan or (for LEP students) that these accommodations are used as necessary to yield accurate and reliable information about what LEP students know and can do (4.6(a), (c)).
5. The State must provide evidence that it has determined that scores on the general science assessment for students with disabilities and LEP students 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 (4.6(b), (d)).

### **5.0 ALIGNMENT**

1. The State must provide evidence that the general science assessments and the standards for science are aligned comprehensively, meaning that the assessments reflect the full range of the State's academic content standards; that the assessments are as cognitively challenging as the standards; that the assessments and standards are aligned to measure the depth of the standards; and that the assessment reflects the degree of cognitive complexity and level of difficulty of the concepts and processes described in the standards (5.2).

2. The State must provide evidence that the general science assessments and the standards for science are aligned in terms of both content (knowledge) and process (how to do it), as necessary, meaning that the assessments measure what the standards state students should both know and be able to do (5.3).

## **6.0 INCLUSION**

1. The State must provide evidence of participation data that indicate that all students in the tested grade levels or grade ranges are included in the science assessments (*e.g.*, students with disabilities, LEP students, economically disadvantaged students, students of each major racial and ethnic group, migrant students) (6.1.1).
2. The State must report separately the number and percent of students with disabilities assessed on the regular science assessment without accommodations, on the regular science assessment with accommodations, on an alternate science assessment against grade-level standards, and, if applicable, on an alternate science assessment against alternate achievement standards and/or on an alternate science assessment against modified academic achievement standards (6.1.2).
3. The State must provide evidence that it has developed, disseminated information on, and promoted use of appropriate accommodations to increase the number of students with disabilities who are tested in science against academic achievement standards for the grade in which they are enrolled (6.2.1(a)).
4. The State must provide evidence that it has ensured that general and special education teachers and other appropriate staff know how to administer science assessments, including making use of accommodations, for students with disabilities and students covered under Section 504 (6.2.2(b)).
5. The State must document that students with the most significant cognitive disabilities are, to the extent possible, included in the general science curriculum (6.2.4).

## **7.0 REPORTING**

1. The State must provide evidence of a reporting system that facilitates appropriate, credible, and defensible interpretation and use of its assessment data (7.1).
2. The State must report participation and assessment results for science for all students and for each of the required subgroups in its State reports, including students tested vs. total enrollment (7.2).
3. The State must provide complete individual student reports that provide information for parents, teachers, and principals to help them understand and address a student's specific academic needs for science, including information displayed in a format and language that is understandable to parents, teachers, and principals and that the reports are accompanied by interpretive guidance for these audiences (7.3(b)).
4. The State must provide copies of itemized score analyses so that parents, teachers, and principals can interpret and address the specific academic needs of students for science (7.5).

## **EVIDENCE FOR ARIZONA'S ALTERNATE SCIENCE ASSESSMENT**

Arizona must submit a complete set of evidence for the alternate science assessment based on alternate achievement standards.