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Henry L. Johnson
Assistant Secretary for Elementary and Secondary Education
United States Department of Education
Federal Office Building 6, Room 3W315
400 Maryland Avenue
Washington D.C. 20202

Dear Mr. Johnson:

We have carefully and thoroughly reviewed the information and guidance recently released by Secretary Spellings and the U.S. Department of Education relative to Growth Model Pilot Applications. Maryland is very interested in this model to recognize the work and progress of students, schools, and school systems as they strive to ensure that every child attains grade level proficiency by 2013-14. We commend Secretary Spellings and the Department for offering the opportunity to states to develop and submit proposals for this flexibility.

Maryland is requesting the opportunity to submit a proposal in the near future to implement a Growth Model, effective with the 2007 assessments, rather than with the 2006 assessments. By the 2006-07 school year, we believe we will have the necessary tools in place to track individual student progress statewide, use a growth model in making AYP determinations, ensure that achievement gaps are closing for all groups of students, and ensure that all students will be proficient by 2013-14, consistent with NCLB statute and regulations.

Because Maryland has 24 large school systems, each local school system already has in place a system to track students within the individual school system. We believe we will be able to link to these local data base systems and implement tracking for students statewide by the 2007 testing. A statewide system of tracking student data will be in place no later than 2008. We are specifically interested in developing a growth model based on the use of status, safe harbor, and growth to determine AYP status for schools and to identify schools that are in need of improvement.

Our proposal will also include producing separate accountability decisions about student achievement in reading/language arts and in mathematics; include all students and school districts, consistent with NCLB requirements; and include student participation rates and attendance/dropout rates as the other required academic indicator.



How Maryland Will Adhere to the Seven Core Principles

Core Principle 1: 100% Proficiency by 2014 and Incorporating Decisions about Student Growth into School Accountability

- 1.1 How does the State accountability model hold schools accountable for universal proficiency by 2013-14?** *The current accountability plan for Maryland includes the requisite Annual Measurable Objectives through 2014, when all targets call for 100% proficiency. Per existing federal law, Maryland would set the 2014 targets for those schools measured by the growth model as 100% as well. However, for schools with grades three through eight demonstrating acceptable growth in state reading and mathematics assessments and in the other academic measure (attendance rate) through the 2013 school year, there will be a requirement that all students are performing at the proficient level by 2014. If the 2007 reauthorization of No Child Left Behind alters the existing rules for annual targets through 2014, then Maryland would alter its rules for calculating Adequate Yearly Progress accordingly.*
- 1.1.1** *Does the State use growth alone to hold schools accountable for 100% proficiency by 2013-2014? Maryland anticipates using the growth model along with status and safe harbor. In any given year, the school's AYP status would be determined by computing its ability to meet the Annual Measurable Objective, first by the status model, then by applying safe harbor, and then finally by applying the computation for growth of individual students within a school over the previous school year. Maryland anticipates conducting studies to compare and evaluate accountability decisions using status and growth models. The growth model would not be available for high schools since there is only one year's data available for a typical four-year high school, and therefore effectively no ability to show progress.*
- 1.2 Has the State proposed technically and educationally sound criteria for “growth targets” for schools and subgroups?**
- 1.2.1** *What are the State’s “growth targets” relative to the goal of 100% of students proficient by 2013-14? Maryland expects to use an approvable process for establishing growth targets. We currently believe that for each student whose growth is tracked, there should be an expectation that proficiency should be attained within no more than three years.*
- 1.2.2** *Has the State adequately described the rules and procedures for establishing and calculating “growth targets? Maryland is not currently prepared to describe in detail the expected rules and procedures for establishing and calculating “growth targets,” but we anticipate using generally accepted approaches as modeled by other states that begin with a pilot in the 2005-2006 school year.*
- 1.3 Has the State proposed a technically and educationally sound method of making annual judgements about school performance using growth?**

- 1.3.1 Has the State adequately described how annual accountability determinations will incorporate student growth? *Maryland is currently determining how it can construct and apply appropriate annual measurements of growth that will work in concert with the fixed standards used in Maryland's current status model. The intent would be to use standard acceptable practices that are verifiable and replicable as necessary.*
- 1.3.2 Has the State adequately described how it will create a unified AYP judgment considering growth and other measures of school performance at the subgroup, school, district, and state level? *While Maryland is yet to determine how to make a unified AYP judgment for a school, we are committed to ensure that such determinations mirror the methods used for school, school system, state, and subgroup AYP determinations using both the status and safe harbor approaches. The suite of AYP determination tools must operate in concert and provide accurate and fair results that can be reasonably understood by users at the school and system level.*
- 1.4 **Does the State proposed growth model include a relationship between consequences and rate of student growth consistent with Section 1116 of ESEA?**
- 1.4.1 Has the State clearly described consequences the State/LEA will apply to schools? *Maryland sees no reason that the current procedures for assigning consequences for AYP results should be disparate from those used with the growth model it develops. A school's inability to achieve AYP via the status model should be treated in an identical fashion with those failing to achieve AYP as measured by a growth model or safe harbor.*

Core Principle 2: Establishing Appropriate Growth Targets at the Student Level

- 2.1 **Has the State proposed a technically and educationally sound method of depicting annual student growth in relation to growth targets?**
- 2.1.1 Has the State adequately described a sound method of determining student growth over time? *Maryland plans to study the growth models that are approved in the current round of pilots to be certain our target-setting approach is sound. However, we envision our approach to be a coherent one that parallels the target-setting approaches used for the status model we plan to continue.*

Core Principle 3: Accountability for Reading/Language Arts and Mathematics Separately

- 3.1 **Has the State proposed a technically and educationally sound method of holding schools accountable for student growth separately in reading/language arts and mathematics?**

- 3.1.1 Are there any considerations in addition to the evidence presented for Core Principle 1?
(To be determined.)

Core Principle 4: Inclusion of All Students

4.1 Does the State’s growth model proposal address the inclusion of all students, subgroups and schools appropriately?

4.1.1 Does the State’s growth model address the inclusion of all students appropriately?
Maryland’s growth model will include all students as with the current status model, and the planned state longitudinal data system will be used by 2008 to ensure that individual students are tracked, even as they transfer between school systems in Maryland.

4.1.2 Does the State’s growth model address the inclusion of all subgroups appropriately?
Maryland’s current status model fully encompasses all students, including students with disabilities and English Language Learners—subgroups that frequently “disappear” in some accountability systems by the use of large subgroups. Maryland will continue to use five students as the minimum subgroup size when the growth model is applied.

4.1.3 Does the State’s growth model address the inclusion of all schools appropriately?
Maryland has worked with local school systems to include all schools in its accountability programs and to ensure that measures are appropriate to all school grade configurations.

Core Principle 5: State Assessment System and Methodology

5.1 Has the State designed and implemented a Statewide assessment system that measures all students annually in grades 3-8 and one high school grade in reading/language arts and mathematics in accordance with NCLB requirements for 2005-06, and have the annual assessments been in place since the 2004-05 school year?

5.1.1 Provide a summary description of the Statewide assessment system with regard to the above criteria. *A more detailed description of Maryland’s assessment system is available in its Accountability Workbook, accessible on the Maryland State Department of Education website at www.marylandpublicschools.org. The assessment tests students at all grades from grade three through grade eight in each of reading and mathematics. At the high school level, students are tested using end-of-course examinations that are part of our graduation assessments—the Maryland High School Assessments. Algebra/Data Analysis and English II, both typically taken in grade ten, fulfill the NCLB requirement*

for assessments at the high school level. Assessments are fully aligned to state content standards and represent a coordinated effort to put all students on the trajectory for success at the high school level and ultimately for graduation.

Maryland also operates a parallel set of alternative assessments for students that are compliant with federal requirements and which have been reviewed along with our standard assessments in Peer Review. Maryland is currently developing modified assessments for submission in a few months for 2% of students with disabilities, per guidelines from USDE. At an appropriate time, Maryland will submit the modified assessments for review as well.

- 5.1.2 Has the State submitted its Statewide assessment system for NCLB Peer Review and, if so, was it approved for 2005-2006? *Maryland's assessment system was reviewed by the USDE in 2005 and received a result of "deferred approval." Maryland is expected to submit remaining information to the Department so that it can achieve full approval by the May 2006 Peer Review series.*

5.2 How will the State report individual student growth to parents?

- 5.2.1 How will an individual student's academic status be reported to his or her parents in any given year? What information will be provided about academic growth to parents? Will the student's status compared to the State's academic achievement standards also be reported? *The individual student performance on State assessments is reported to each parent each year. The reporting instrument compares the student with the state result. We are currently looking to improve the current reporting system for all students. In terms of reporting individual student growth, we plan to report to parents in a clear fashion with appropriate comparisons. However, we will need to await final design of the growth system to develop the reports to parents.*

5.3 Does the Statewide assessment system produce comparable information on each student as he/she moves from one grade level to the next?

- 5.3.1 Does the State provide evidence that the achievement score scales have been equated appropriately to represent growth accurately between grades 3-8 and high school? If appropriate, how does the State adjust scaling to compensate for any grades that might be omitted in the testing sequence? *Maryland's assessments are not vertically equated from year to year. While Maryland's assessments are not vertically equated, we have developed moderated achievement standards in third grade through eighth grade. Current research from various national groups indicate that it is possible to develop an approvable plan with moderated achievement standards rather than vertically equated standards from grade to grade. Details on how we might complete this critical aspect of the growth model will be fully developed once we have clear guidance from the USDE and from national experts on this.*

- 5.3.2 If the State uses a variety of end-of-course tests to count as the high school level NCLB test, how would the State ensure that comparable results are obtained across tests? *(Not*

applicable since Maryland does not plan to include high schools in the growth model option.)

5.3.3 How has the State determined that the cut-scores that define the various achievement levels have been aligned across the grade levels? What procedures were used and what were the results? *The methodology to be used for setting cut-scores will likely mirror that used for our Maryland School Assessments and appropriate statistical tools. However, we are not yet at the stage that we can identify our procedures.*

5.3.4 Has the State used any “smoothing techniques” to make the achievement levels comparable and, if so, what were the procedures? *We are not at a point we can address the use of “smoothing techniques” but will have more information on statistical tools used once our model is finalized for proposal to USDE.*

5.4 Is the Statewide assessment system stable in its design?

5.4.1 To what extent has the Statewide assessment system been stable in its overall design during at least the 2004-05 and 2005-06 academic terms with regard to grades assessed, content assessed, assessment instruments, and scoring procedures? *Grades three through eight assessments currently administered in reading and mathematics were first administered in the spring of 2003 and have remained in place since that time as has the alternative assessment. Maryland separately has been working on modified assessments for grades three through high school for implementation as early as the 2006-2007 school year. Currently, in absence of the modified assessments, Maryland utilizes an appeals process to give schools benefit of the estimated impact of the new assessments on the Adequate Yearly Progress for the 2004-2005 and 2005-2006 school year. A request is currently on file with the USDE for the permission to use the modified assessment appeals with the spring 2006 assessment cycle.*

5.4.2 What changes in the Statewide assessment system’s overall design does the State anticipate for the next two academic years with regard to grades assessed, content assessed, assessment instruments, scoring procedures, and achievement level cut-scores? *Maryland does not anticipate any changes in the next two years in its assessment other than the introduction of the modified assessments in reading and mathematics in 2007. Given the design of Maryland’s current modified assessment appeals system, we believe that the introduction of the modified assessments to the system in 2007 will complete our standard assessments.*

Core Principle 6: Tracking Student Progress
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6.1 Has the State designed and implemented a technically and educationally sound system for accurately matching student data from one year to the next?

- 6.1.1 Does the State utilize a student identification number system or does it use an alternative method for matching student assessment information across two or more years? If a numeric system is not used, what is the process for matching students? *Maryland does not currently use a system to track student assessment information because we do not currently have a unique student identifier. The award of a USDE grant to Maryland was made beginning December 1, 2005 for the purpose to put in place a statewide student data base with a unique student identifier in place. In the interim, we are aware that local school systems have their own identification and tracking system for all students and are capable of tracking students over time. Maryland believes it can initiate procedures in 2007 as it starts implementation of its statewide database that will give us the capacity to implement a growth model. In the course of developing our initiative, we have begun discussing the employment of a matching system for those students migrating between school systems. Several matching systems are used nationally to ensure students are not dropped from tracking procedures, and we are studying those carefully for a system that will do this most accurately.*
- 6.1.2 Is the system proposed by the State capable of keeping track of students as they move between schools or school districts over time? What evidence will the State provide to ensure that match rates are sufficiently high and also not significantly different by subgroup? *Maryland is developing a student data system that will provide for longitudinal tracking of students within school systems and between school systems. We are studying matching rates from various sources and will employ one which provides an acceptable rate of match and will employ quality control systems to ensure the maintenance of those high rates.*
- 6.1.3 What quality assurance procedures are used to maintain accuracy of the student matching system? *We will develop a quality assurance system within the design of the tracking and matching system, but we are not prepared to detail those procedures at this early stage.*
- 6.1.4 What studies have been conducted to demonstrate the percentage of students who can be “matched” between to academic years? Three years or more years? *(See the response to 6.1.3.)*
- 6.1.5 Does the State student data system include information indicating demographic characteristics (e.g., ethnic/race category), disability status, and socio-economic status (e.g., participation in free/reduced price lunch)? *Maryland’s local school systems currently have complete data tracking systems that include all of the requisite race/ethnicity and special services information. Maryland’s statewide data base system will minimally include these features.*
- 6.1.6 How does the proposed State growth accountability model adjust for student data that are missing because of the inability to match a student across time or because a student moves out of a school, district, or the State before completing the testing sequence? *Maryland’s detailed proposal will provide detail on this procedure once it is developed.*

6.2 Does the State data infrastructure have the capacity to implement the proposed growth model?

- 6.2.1 What is the State’s capability with regard to a data warehouse system for entering, storing, retrieving, and analyzing the large number of records that will be accumulated over time? *Maryland is currently in a good position to expand its data-management system to include student data, given the \$5.7 million grant from USDE over the next three years, which was awarded to put a longitudinal data system in place. The project builds well on a very sophisticated educational data warehouse (EDW) at the state level and the currently used local data systems in Maryland.*
- 6.2.2 What experience does the State have in analyzing longitudinal data on student performance? *The introduction of the longitudinal data system will permit us to work with individual student performance growth in much the same way we are currently tracking school system and school growth.*
- 6.2.3 How does the proposed growth model take into account or otherwise adjust for decreasing student match rates over three or more years? How will this affect the school accountability criteria? *Maryland’s longitudinal data system will include procedures for matching student data over time, but the specific methodology for dealing with decreasing match rates is yet to be addressed until the final plan is in place.*

Core Principle 7: Participation Rates and Additional Academic Indicator
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7.1 Has the State designed and implemented a Statewide accountability system that incorporates the rate of participation as one of the criteria?

- 7.1.1 How do the participation rates enter into and affect the growth model proposed by the State? *Maryland currently anticipates no technical issues that would require a modification in our current participation rate calculation procedures. However, once our new data system is completed, we believe that we can evaluate any incremental procedural changes that may be suggested.*
- 7.1.2 Does the calculation of a State’s participation rate change as a result of the implementation of a growth model? *At this point, there is no indication that Maryland would seek a change in its participation rate procedure.*

7.2 Does the proposed State growth accountability model incorporate the additional academic indicator?

- 7.2.1 What are the “additional academic indicators” used by the State in its accountability model? What are the specific data elements that will be used and for which grade levels will they apply? *Maryland uses attendance rate at the elementary and middle school*

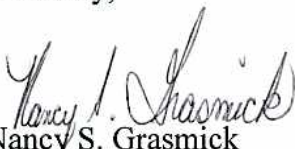
levels. Though we use graduation rate as the additional academic indicator at the high school level, we do not believe that this data element will be part of the system since high schools are not anticipated to be in the growth model proposal from the State.

- 7.2.2 How are the data from the additional academic indicators incorporated into accountability determinations under the proposed growth model? *It will take some study on the part of the Maryland State Department of Education staff to determine how attendance rate would be included in a growth model proposal. We will be watching carefully the progress in the states that go before Maryland for best practices that can be incorporated into the Maryland design.*

The Maryland State Department of Education has a long recognized history of holding schools and school systems accountable for the academic performance of all students, and we are genuinely committed to delivering the best educational opportunities to our children. We are grateful to the Department for the rapid response and consideration given to our previous requests and look forward to having the opportunity to present a growth model proposal to you in the near future. At this time we wish to express our interest in implementing a growth model in 2006-2007 and would seek preliminary approval to proceed toward that goal. We would like to be engaged in any support activities from USDE as we move forward.

Please contact me or Dr. Ronald Peiffer, Deputy State Superintendent for Academic Policy, at 410-767-0473 if you have any questions.

Sincerely,


Nancy S. Grasmick
State Superintendent of Schools

NSG:sks