



What states can learn about state standards and assessment systems from No Child Left Behind documents and interviews with Central Region assessment directors



Institute of Education Sciences
U.S. Department of Education



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March 2008

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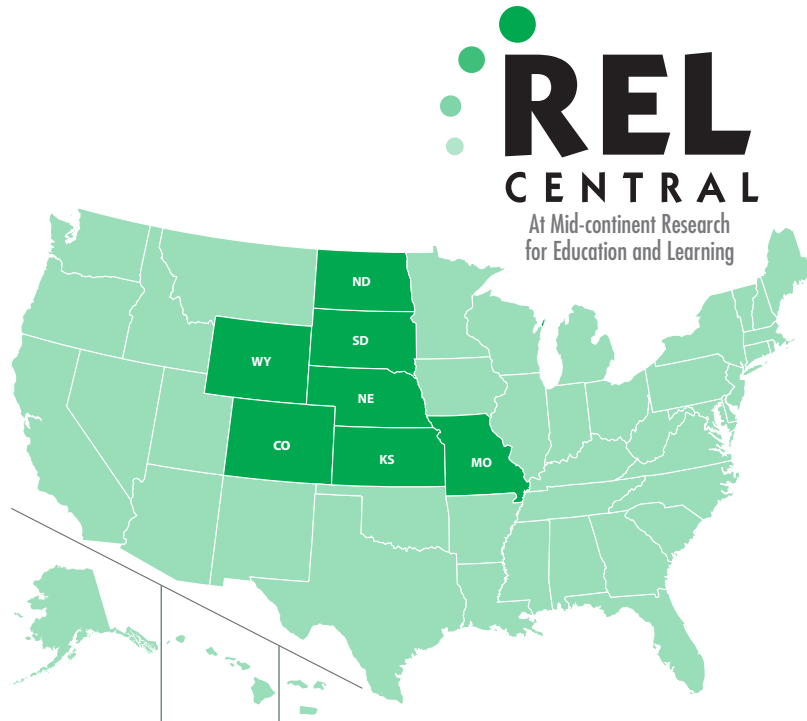
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Institute of Education Sciences

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Summary

What states can learn about state standards and assessment systems from No Child Left Behind documents and interviews with Central Region assessment directors

The purpose of this study is to describe the No Child Left Behind requirements for state standards and assessment systems. It examined official documents and peer review decision letters and included interviews with state assessment directors in the Central Region to highlight the challenges states face in developing and implementing approved systems.

For decades teachers have administered classroom assessments to grade students, and districts have administered assessments to monitor districtwide programs. The advent of statewide standards in the late 1980s and early 1990s has, however, led to more centralized assessment systems. Today, student assessments are the center piece of state systems for holding schools accountable, which raises the stakes for schools, teachers, and students.

The No Child Left Behind (NCLB) Act of 2001 added new federal requirements to existing local and state assessment programs. Practitioners and policymakers at the state, district, and classroom levels must address the challenge of understanding the new federal requirements and of devising systems that comply with them, while ensuring that their

assessment systems continue to meet state and local objectives.

The act requires that state systems incorporate seven components—academic content standards, academic achievement standards, statewide assessment system, technical quality, alignment, inclusion, and reporting. State systems must be approved through a formal peer review process. But as with any new legislation, turning directives into directions is no easy task.

Describing the assessment landscape is an important need for states in the Central Region. In a 2005 Gallup survey of principals and superintendents in the Central Region, 82 percent of respondents indicated that creating district assessment systems to support teaching and learning should be a high priority, and 85 percent rated data-based decisionmaking, which depends on a functional assessment system, as a high priority (Gallup, 2007). State educators and policymakers, in conversations with state liaisons from the Central Regional Educational Laboratory, also indicated a need to better understand how to develop and maintain state standards and assessment systems. The situation is clear. States want to develop assessment systems that meet federal requirements but that

are also mindful of state and local needs and capabilities. States with approved assessment systems want to refine and improve their systems in a way that aligns with the NCLB Act.

The purpose of this study is to describe the NCLB requirements on state standards and assessment systems and to highlight the issues and challenges states face in developing and implementing approved systems. The study examined all relevant official NCLB documents and peer review decision letters posted as of February 28, 2007, to summarize the requirements expressed both in the official U.S. Department of Education guidance and in requests of the peer review teams for additional documentation.

To highlight the components of states' peer review submissions that peer review teams were most likely to identify as needing further work or evidence, this report drew on the decision letters and on interviews with state assessment directors in the Central Region. Peer reviewers most frequently raised issues under the alignment, technical quality, and academic

achievement standards components. In the Central Region states inclusion and academic content standards were also significant issues.

While some states only needed to tweak their existing assessment systems to meet the NCLB requirements, others have had to build a system from scratch. The three greatest, and often unexpected, challenges identified by the state assessment directors were promoting assessment literacy, coordinating the development and review process, and identifying internal and external expertise.

These findings indicated that states might benefit from a summary of the requirements that could inform the development, implementation, and ongoing revision of their state assessment systems. To that end, the authors created seven detailed checklists, one for each of the required components, which summarize their understanding of the NCLB requirements for each component of a state standards and assessment system.

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WHY THIS STUDY?

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The No Child Left Behind (NCLB) Act of 2001 added new federal requirements to existing local and state assessment programs. Practitioners and policymakers at the state, district, and classroom levels must address the challenge of understanding the new federal requirements and of devising systems that comply with them, while ensuring that their assessment systems continue to meet state and local objectives.

The act requires that state systems incorporate seven components—academic content standards, academic achievement standards, statewide assessment system, technical quality, alignment, inclusion, and reporting. State systems must be approved through a formal peer review process. But as with any new legislation, turning directives into directions is no easy task.

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but that are also mindful of state and local needs and capabilities. States with approved assessment systems want to refine and improve their systems in a way that aligns with the NCLB Act.

The purpose of this study is to describe the NCLB requirements on state standards and assessment systems and to highlight the issues and challenges states face in developing and implementing approved systems. The study examined all relevant official NCLB documents and peer review decision letters posted as of February 28, 2007, to summarize the requirements expressed both in the official U.S. Department of Education guidance and in requests of the peer review teams for additional documentation (see appendix A).¹

To highlight the components of states' peer review submissions that peer review teams were most likely to identify as needing further work or evidence, this report drew on the decision letters and on interviews with state assessment directors in the Central Region. Peer reviewers most frequently raised issues under the alignment, technical quality, and academic achievement standards components. In the Central Region states inclusion and academic content standards were also significant issues.

While some states only needed to tweak their existing assessment systems to meet the NCLB requirements, others have had to build a system from scratch. The three greatest, and often unexpected, challenges identified by the state assessment directors were promoting assessment literacy, coordinating the development and review process, and identifying internal and external expertise.

These findings indicated that states might benefit from a summary of the requirements that could inform the development, implementation, and ongoing revision of their state assessment systems. To that end, the authors created seven detailed

checklists, one for each of the required components, which summarize their understanding of the NCLB requirements for each component of a state standards and assessment system (see appendix B for the checklists).

STATE STANDARDS AND ASSESSMENT SYSTEMS

The NCLB Act built on the 1994 reauthorization of the Elementary and Secondary Education Act, which required states to develop standards and administer annual assessments of reading and mathematics at three grade levels (Commission on No Child Left Behind, 2007). Under the NCLB Act states are required to develop a statewide standards and assessment system around seven components:

- *Academic content standards.* States must develop challenging academic content standards for each of grades 3–8 and for the 10–12 grade span for mathematics and for reading and language arts.
- *Academic achievement standards.* States must develop a set of challenging academic achievement standards for every grade and content area assessed.
- *Statewide assessment system.* States must develop a single statewide system of high quality assessments.
- *Technical quality.* States must employ the processes described in Standards for Educational and Psychological Testing (American Psychological Association, 1999) in developing and administering the assessments.
- *Alignment.* States must align academic content standards, academic achievement standards, and assessments.
- *Inclusion.* States must decide how individual students will participate in the system, not whether each student will participate.

- **Reporting.** State assessment systems must include adequate reporting.

The peer review process

States were required to submit evidence to a formal peer review process that their statewide standards and assessment systems complied fully with NCLB requirements. The often substantial state submissions were reviewed by teams of peer reviewers and national standards and assessment experts. States then received a letter noting whether their system had been approved or, if not, what additional issues needed to be addressed.

The peer review process for state standards and assessment systems began with a training session in fall 2004. Peer reviews were held quarterly from February 2005 to May 2007. States could

choose their review date but were expected to have a fully approved system in place by July 1, 2007.² Four states were fully approved after their first submission; all other states were required to submit additional evidence to address outstanding issues.

Approval status of state assessment systems

All states administered assessments of mathematics and reading and language arts in grades 3–8 and once in high school in the 2005/06 school year (U.S. Department of Education, 2006, June 30). As of February 28, 2007, when this analysis was conducted, 20 states had received *full approval*—with or without recommendations—for their state assessment systems (table 1; box 1 defines the approval categories). Four were categorized as *approval expected* upon submission of final

TABLE 1

Approval status of state assessment systems as of February 28, 2007

| Full approval (N = 10) | Full approval with recommendations (N = 10) | Approval expected (N = 4) | Approval pending (N = 3) | Approval pending, mandatory oversight (N = 22) | Not approved (N = 2) |
|--|---|--|---|---|-------------------------|
| Alaska Iowa Maryland Massachusetts Michigan Ohio Oklahoma Tennessee West Virginia Texas | Arizona Arkansas Colorado Connecticut Delaware Idaho Indiana North Carolina South Carolina Utah | Louisiana Montana Pennsylvania Virginia | Kansas North Dakota South Dakota | Alabama California District of Columbia Florida Georgia Illinois Kentucky Minnesota Missouri Nebraska Nevada New Hampshire New Jersey New Mexico New York Oregon Puerto Rico Rhode Island Vermont Washington Wisconsin Wyoming | Hawaii Maine |

Note: Mississippi received a one-year extension because of Hurricane Katrina. Central Region states are in bold.

Source: Authors' analysis of U.S. Department of Education decision letters.

BOX 1

Approval categories for state assessment systems

The approval categories referenced in the state decision letters analyzed for this study are defined as follows in an April 24, 2006, letter from the U.S. Department of Education to chief state school officers (U.S. Department of Education, 2006, April 24):

Full approval was granted if a state's standards and assessment system met all statutory and regulatory requirements and no additional action was required.

Full approval with recommendations was granted if a state's system met all the statutory and regulatory requirements, but parts of the system could be improved. In this case, the U.S. Department of Education approved the system but recommended improvements.

Approval expected was granted if the state administered an assessment

in grades 3–8 and in high school in 2005/06 and provided evidence that the system was fully compliant with the statutory and regulatory requirements, but certain elements of the state's system could not be completed by July 1, 2006, because data from the first administration was needed to complete them (such as setting academic achievement standards). In this case the state had to provide the remaining required documentation before administering assessments in 2006/07. Conditions might be placed on a state's Title I grant award or on NCLB flexibility agreements.

Approval pending was granted if the standards and assessment system a state administered in 2005/06 had at least one missing component or did not meet the statutory and regulatory requirements, such as establishing alternate achievement standards for students with significant cognitive disabilities. Under *approval pending* the state must be able to administer a fully compliant system in the 2006/07 school year. States in this category

might also be given *mandatory oversight status*, which places specific conditions on a state's grant award, such as requiring more detailed reporting, restricting a state's authority to draw down its Title I funds, withholding a state's Title I Part A administrative funds, or significantly limiting flexibility requests.

Not approved status was granted if several fundamental components of a state's standards and assessment system were missing or did not meet the statutory or regulatory requirements. Assessments might not have been based on grade-specific content standards or grade-level equivalents, for example, which might prevent a state from implementing a fully compliant system in 2006/07. States in this category must agree with the U.S. Department of Education to bring their systems into full compliance as soon as possible but within two years. States' Title I Part A administrative funds might be withheld and significant limitations put on flexibility requests.

documentation (such as actual participation data or technical data related to the assessment development). Twenty-five states were designated as *approval pending*, which requires the submission of further evidence for one or more fundamental components of the assessment system. (In most cases states designated as *approval pending* were also under *mandatory oversight*, which requires more detailed reporting for dispersal of grant funds while the state comes into full compliance.) Hawaii's and Maine's systems were not approved, and Mississippi was granted an additional year due to Hurricane Katrina. In the Central Region Colorado received *full approval with recommendations*, while the other states received *approval pending*.

That status of states continues to change as states revise their systems. Reexamination of the approval status of states as of January 4, 2008, showed that 29 states had received *full approval*—with or without recommendations—for their state assessment systems. Six states were categorized as *approval expected* upon submission of final documentation. Twelve states were designated as *approval pending*. In all cases states designated as *approval pending* were also under *mandatory oversight*, indicating significant issues only with an alternate assessment based on alternate achievement standards or an assessment for limited English proficiency students, or under a *compliance agreement*, a new category indicating significant issues with a state's general

assessments and possibly substantive issues with an alternative assessment. In the Central Region North Dakota had received *full approval*; Colorado, Kansas, and Missouri had received *full approval with recommendations*; Nebraska had received *approval pending under a compliance agreement*, and South Dakota and Wyoming had received ratings of *not approved*.

GUIDING STATES THROUGH THE APPROVAL PROCESS

This study describes the requirements for state standards and assessment systems established in the NCLB Act and the challenges that states in the Central Region have addressed in developing and implementing approved systems. The description is based on an examination of official guidance documents published by the U.S. Department of Education and of the peer review decision letters sent to individual states as part of the peer review process for obtaining U.S. Department of Education approval of a state's standards and assessment system. Key elements of the description are summarized in a series of checklists created by the authors (see appendix B). These checklists highlight specific elements that are noted in official guidance documents or in peer review decision letters requesting additional evidence on states' proposed systems.

State assessment directors from the seven Central Region states were interviewed to determine which issues raised by the peer reviewers had been resolved and which issues continued to require consideration. The interviews also provided insight into the challenges faced by states as they worked to meet the NCLB requirements, specifically the local challenges faced in the Central Region states.

This part of the study is thus organized around three research questions:

1. What are the key NCLB requirements for a state standards and assessment system?

2. What issues and assessment components have peer reviewers most often identified as requiring further action from states in order to meet NCLB requirements?
3. What challenges have Central Region states faced in developing and implementing state assessment systems that meet NCLB requirements?

FINDINGS

The findings from the review of official NCLB documents and peer review decision letters and from interviews with state assessment directors are organized around the study's three research questions.

What are the key NCLB requirements for a state standards and assessment system?

Two U.S. Department of Education documents provided definitive information to guide states through the assessment development process: *Standards and Assessments Peer Review Guidance: Information and Examples for Meeting Requirements of the No Child Left Behind Act of 2001* (U.S. Department of Education, 2004, April 28) and the *User's Guide to Preparing Submissions for the NCLB Standards and Assessments Peer Review* (U.S. Department of Education, 2005, May). The *User's Guide* was prepared after the initial round of peer reviews indicated that states often failed to submit adequate evidence to address a required component. This section summarizes the requirements for each of the seven components outlined in the official guidance and used by the peer review teams (see appendix B for checklists of the requirements). It reflects the authors' understanding of NCLB requirements for state standards and assessment systems

To establish a foundation for a high quality assessment system, states must develop challenging academic content standards in mathematics and reading and language arts

based on their reading of these official documents and their review of the results of the peer review process.

Academic content standards. To establish a foundation for a high quality assessment system, states must develop challenging academic content standards in mathematics and reading and language arts for each of grades 3–8 and for the 10–12 grade span. Academic content standards must also be developed in science for grade spans 3–5, 6–9, and 10–12.

The standards in these three content areas must specify both content (what children should know) and processes (what children should be able to do). They must encourage the teaching of advanced skills and be articulated across grade levels. The NCLB Act requires that the content standards be applied to all students in the state for every grade and content area assessed.

Academic achievement standards. States must develop a set of challenging academic achievement standards for every grade and content area assessed. These achievement standards must be aligned with the academic content standards and include at least three levels of achievement, two indicating high achievement or mastery of the content standards (proficient and advanced) and one indicating basic achievement (not yet proficient). They must also include clear descriptions of the competencies represented by each performance level and the cutscores that differentiate the levels. Because the achievement standards must be applied to all students in the state, states must

develop procedures for including students with disabilities and students not yet proficient in English (such as alternate assessments or alternate achievement standards for students with the most significant cognitive disabilities).

States must develop a set of challenging academic achievement standards for every grade and content area assessed

Statewide assessment system. To evaluate whether all students are achieving at high levels on an annual basis and whether all students are on track to

meet or exceed proficiency standards by 2013/14, states must develop a single statewide assessment system. The assessment system must include annual testing in the required content areas and grade levels, provide for the participation of all students, and meet NCLB criteria for technical quality and alignment.

States may use a variety of assessments to meet these requirements, including statewide assessments, a combination of statewide and local assessments, or local assessments only. Assessments may be either criterion-referenced or augmented norm-referenced tests that include additional items to accurately represent the state's content standards and report achievement standards across grade levels. Criterion-referenced tests indicate whether a student demonstrated specific knowledge or skills. Norm-referenced tests indicate how a student performed relative to other students. States must also have at least one alternate assessment for students who are unable to participate in the regular assessment.

Technical quality. To ensure that all assessments are high quality and that the use of results is appropriate, credible, and technically defensible, states must employ the processes described in *Standards for Educational and Psychological Testing* (American Psychological Association, 1999). States must demonstrate the validity³ of all assessments with special consideration of the intended use and interpretation as well as the potential misuse and/or misinterpretation of each assessment. States must also demonstrate the reliability⁴ of assessments using traditional methods and actual measures that show the precision of cutscores, the accuracy of score changes from year to year, and the consistency of student subgroup classifications.

To make sure the assessment system is accessible, fair, and unbiased, states must provide training for making testing accommodations and clear criteria for administering, scoring, analyzing, reporting, and quality monitoring. They must also frequently review the interpretation and use of

results to ensure that valid inferences are made. Finally, states must demonstrate the comparability of assessment forms (assessments translated into another language) and formats (computer, paper and pencil).

Alignment. To ensure that a state's standards and assessment system provides valid information for making accountability decisions and improving education, academic content standards and academic achievement standards and assessments must be aligned.

In other words, the state assessment system must reflect the full range of the achievement standards (basic, proficient, and advanced) and the difficulty, cognitive complexity, and depth of the content standards. States must communicate to education stakeholders how the standards and assessments are aligned. Alignment needs to be reverified when any changes are made to the standards or the assessments.

Inclusion. To ensure that a state's assessment system applies the standards to all students, including those with disabilities and those not yet proficient in English, states must decide how individual students will participate in the system, not whether the students will participate.

States are required to provide participation data, disaggregated by subgroup, to show that all students in the required grades or grade spans are included either in the regular assessment (with or without accommodations) or in an alternate assessment. When alternate assessments are used, states must provide guidelines and training to ensure that the appropriate students are taking these assessments and that the assessments and all accommodations are administered properly. The NCLB Act requires that a state have guidelines for assessing students with limited English proficiency, including allowable accommodations and participation requirements based on how long a student has been enrolled in a U.S. school. Policies, guidelines, and practices must also be developed for identifying and including migrant, homeless,

and other mobile students in the assessment system.

Reporting. To ensure that parents, educators, and other stakeholders can find out how well a student or group of students is doing and how to improve achievement in the future, the state assessment system must include adequate reporting.

States must prepare reports at the student, school, district, and state levels that show total scores by content standards and achievement levels. The assessment results must be reported for all student subgroups unless the subgroup is too small to yield statistically reliable information or would identify individual students. Key student subgroups include males and females, low-income students, students with disabilities, English language learners, major racial/ethnic groups, and, as appropriate, migrant students.

These assessment reports form the basis for communicating adequate yearly progress for schools and districts. States are also required to provide interpretive guides to help parents and educators understand and use the results to address students' specific academic needs. Reports and interpretative guides must have an appropriate format, language, and reading level to be accessible to all parents. Reports must be provided as soon as possible after the assessment is administered and before the beginning of the following school year.

What issues and assessment components have peer reviewers most often identified as requiring further action from states?

This section, drawing on the reviewed decision letters and interviews with state assessment directors, highlights what components the peer reviewers most often identified as requiring additional time,

Knowing what issues other states are facing can help states still in the approval process or planning to seek approval for revisions and improvements to their assessment systems

TABLE 2

**Most states had outstanding issues under five or more components as of February 28, 2007
(percent of 87 decision letters identifying issues needing further action)**

| State group | Number of components with outstanding issues | | | | | | |
|-------------------------|--|------|------|------|------|------|------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 |
| All states | 1.1 | 9.2 | 9.0 | 10.3 | 20.7 | 25.3 | 24.1 |
| Central Region states | 6.3 | 0.0 | 0.0 | 6.3 | 31.3 | 25.0 | 31.3 |
| States in other regions | 0.0 | 11.3 | 11.3 | 11.3 | 18.3 | 25.4 | 22.5 |

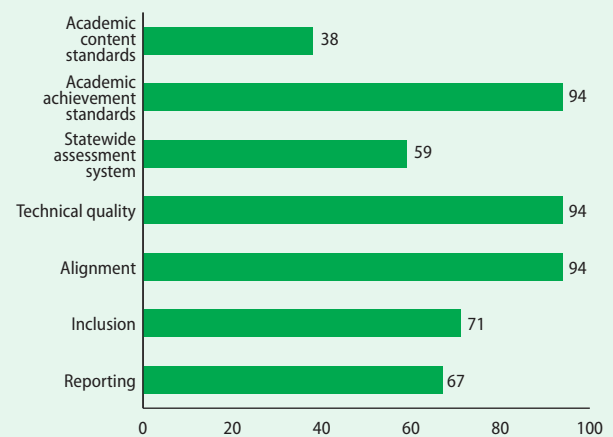
Source: Authors' analysis of U.S. Department of Education decision letters.

attention, or resources by states in order to meet NCLB requirements. Knowing what issues other states were facing can help states still in the approval process or planning to seek approval for revisions and improvements to their assessment systems. Variations in the detail provided by peer reviewers for the specific issues within each of the seven components limited the final analyses to the level of the seven required components. Thus, this report is able to note the relative frequency with which each of the seven components was identified by reviewers as an area in which issues remained (figure 1) and to provide some examples of the issues raised but not to quantify or analyze the individual issues.

Most state assessment systems required further attention before approval. Of the 109 decision letters sent to states by February 2007, 87 raised issues with the standards and assessment systems that states still needed to address (as noted in the “Summary of Additional Evidence” at the end of each letter). Only four states received full approval of their first submission. Most other states received one or two decision letters—43 percent received just one decision letter, 36 percent two, 15 percent three, and 6 percent four. In 70 percent of the decision letters, peer reviewers identified issues under five or more of the seven required components (table 2). Only 10 percent raised issues under just one or two components. This trend was the same when disaggregating the data for the 7 Central Region states and the 45 states and jurisdictions in other regions (these include the District of Columbia and Puerto Rico).

FIGURE 1

Alignment, technical quality, and achievement standards were the most common components of state assessment systems requiring further evidence (percent of 87 decision letters identifying issues needing further action)



Source: Authors' analysis of U.S. Department of Education decision letters.

Achievement standards, technical quality, and alignment raised most often. The 87 decision letters were reviewed to determine how often each of the seven components required under the NCLB Act was identified as an area in need of further evidence. The three most common components raised were academic achievement standards, technical quality, and alignment (see figure 1).

Peer reviewers also identified issues under the inclusion and reporting components and under creating a statewide assessment system, which reiterated issues noted under the other system components. Issues under the inclusion component

focused on developing detailed plans for including all students in the assessment system, identifying which students were eligible to take alternate assessments, and ensuring that appropriate accommodations were in place. And many states were asked to refine and submit sample reports throughout the review process.

Issues with academic content standards were noted in 38 percent of the decision letters. Most states had addressed content standards under the 1994 Elementary and Secondary Education Act. The issues raised usually related to developing new or revised content standards (such as science or alternate assessments) and to providing evidence that the standards are challenging and also relevant for students with cognitive disabilities.

Issues raised for the Central Region states

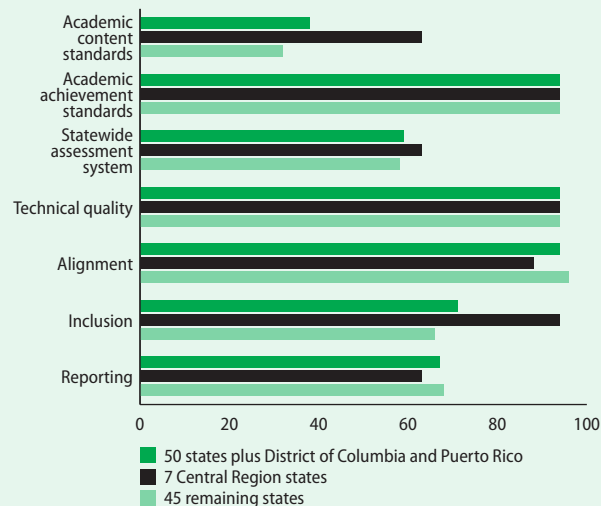
The peer review decision letters directed to the Central Region states raised issues with academic achievement standards, technical quality, and alignment—the three most common assessment components that raised issues across the nation as a whole—and also with inclusion and academic content standards (figure 2). On the component of inclusion decision letters to the Central Region states documented the need for evidence of a formal plan for including all students in the state assessment system (including specific procedures on when to use alternate assessments and policies on accommodations for students with limited English proficiency) and the submission of subgroup participation data. The specific issue with regard to academic content standards, as outlined in the decision letters received by the Central Region states, was the need for evidence of stakeholder diversity in the development of such standards.

Remaining issues for states to consider

All states not yet fully approved as of February 28, 2007, were still developing or refining their alternate assessments for students with disabilities and students with limited English proficiency, largely because the U.S. Department of Education

FIGURE 2

Most common components of state assessment systems requiring further evidence, by Central Region states, all states, and states in other regions (percent of 87 decision letters identifying issues needing further action)



Source: Authors' analysis of U.S. Department of Education decision letters.

had not yet issued final regulations for developing modified achievement standards and aligned assessments for students with disabilities. Thus, final approval for alternate assessments was to be considered in the next round of peer reviews. These final regulations were issued July 20, 2007, initiating a new round of revisions in the ongoing development and refinement of state assessment systems.

At the time of this study, the development of alternate assessments was the only remaining pending issue for the seven Central Region states. As of January 4, 2008, four of the seven Central Region states had received approval, reflecting the changing status of states as they revise their assessment systems.

What challenges have Central Region states faced in developing and implementing state assessment systems that meet NCLB requirements?

Interviews with the state assessment directors in the seven Central Region states illuminate

the challenges of developing and implementing an assessment system that meets the rigorous NCLB requirements. All the assessment directors commented on the “growing complexity and sophistication” of the NCLB Act and the ongoing need to understand how states can translate the NCLB Act requirements into practice. Students must now be assessed at seven grade levels, not just three. And demonstrating technical quality now requires not just the traditional psychometric properties of individual assessments but also data on comparability across tests and grade levels and evidence that assessments are aligned with challenging content and achievement standards. While some states needed only to tweak their existing assessment systems, others have had to build theirs from scratch. But the three greatest challenges identified by the state assessment directors were promoting assessment literacy, coordinating the development and review process, and identifying internal and external expertise.

Promoting assessment literacy. The new requirements for state assessment systems require better communication among stakeholders—students, parents, teachers, principals, and legislators. Central Region states knew they had to provide interpretative guidance to accompany assessment results reports but did not anticipate providing training and other support to improve assessment literacy so that the data would be used appropriately.

Coordinating the development and peer review process. States spent considerable time bringing new legislators, assessment vendors, and staff members up to speed on the NCLB requirements. Some states needed to re-create historical records and set up systems to ensure that the required documentation was produced going forward. But states reported that they struggled with these tasks in the absence of specific guidance on the requirements of a state assessment system and of suggested procedures for developing and implementing

one. As states continue to revise their assessment systems (to test new items or to reflect the regular cycle of review for content standards), well defined procedures could be beneficial. One state assessment director suggested having one full-time staff member dedicated to understanding the federal requirements and coordinating the peer review process.

Identifying and using internal and external expertise. Most state assessment departments are small, with only three to five staff members managing the administration of tests. Assembling the substantial peer review submission was beyond the capacity of some departments.

Some states tapped the expertise of their state technical advisory committees, assessment vendors, and university research centers to address key issues with the development, alignment, and technical quality of the assessment system. Four states also opted to participate in the Limited English Proficiency Partnership convened by the U.S. Department of Education for assistance in preparing appropriate assessments for students with limited English proficiency. All seven of the assessment directors commented that their liaison at the U.S. Department of Education was very helpful, assisting with the peer review process, locating consultants who had the necessary expertise, and explaining peer reviewer comments.

The checklists in this report provide a simple way for states to revisit each of the seven components required for a state assessment system

KEY REQUIREMENTS CHECKLISTS

States may benefit from a summary of the NCLB assessment requirements to support the development, implementation, and ongoing revision of state assessment systems. This report presents seven checklists—one for each of the required components (see appendix B). The checklists reflect the authors’ understanding of NCLB requirements for state standards and assessment systems as conveyed through official guidance documents and through requests for additional evidence in the peer review process.

A state might want, for example, to use these checklists to review the required components of an assessment system during the scheduled revision of academic content standards or to help orient stakeholders and team members to the requirements. Many states have a regular cycle of reviews for content standards. Such reviews include re verifying the alignment of content standards to

assessments and occasionally revising achievement standards. Any such changes require states to reevaluate their compliance with the NCLB requirements for technical quality, inclusion, and reporting. The goal of the checklists in this report is to provide a simple way for states to revisit each of the seven components required for a state assessment system.

NOTES

The authors would like to thank Bruce Randel, Bob St. Pierre, Kirsten Miller, Ravay Snow-Renner, Jean Williams, and the state assessment directors in the Central Region for all their work in completing this research and for their invaluable consultation.

1. This study expands upon an article published in *Education Week* (Olson, 2006), which reported the approval status for each state as of July 2006 and provided examples of the issues and challenges faced by states at that time. It extends the prior work by describing the requirements of state assessment systems and reporting the findings from the authors' systematic review of state decision letters.
2. Because the last peer review was scheduled for May 2007, states were allowed to submit additional evidence on a rolling or "on demand" basis through July 1, 2007.
3. From the checklist in appendix B: Validity of all assessments should be tested using traditional methods and with special consideration of intended and unintended uses of each assessment. Validation efforts should continue throughout the life of the assessment.
4. From the checklist in appendix B: Reliability of all assessments should be tested using traditional measures of reliability coefficients and standard errors of measurement and using actual measures of the precision in cutscores, accuracy of score changes from year to year, and the consistency of student subgroup classification.

APPENDIX A

DATA SOURCES AND METHODS

The study design included a systematic review and analysis of official No Child Left Behind (NCLB) documents and interviews with state assessment directors. All data collection and analysis were conducted by a senior researcher with demonstrated skills in both quantitative and qualitative methods and with previous experience in conducting similar studies in a rigorous manner.

Data sources

The data for this study are limited to official NCLB documents, peer review decision letters posted on the U.S. Department of Education web site through February 2007, and interviews with state assessment directors in the seven Central Region states.

To answer the first research question, official NCLB documents were reviewed in order to summarize the requirements for state assessment systems under the act succinctly in a single document that could be used to communicate the requirements to key stakeholders and to systematically review a state's efforts to improve its standards and assessment system. Key data sources included the act itself, NCLB guidance documents for standards and assessments, and other official updates, reports, and publications issued by the U.S. Department of Education (see the reference list at the end of this report).

The two definitive documents were *Standards and Assessments Peer Review Guidance: Information and Examples for Meeting Requirements of the No Child Left Behind Act of 2001* (U.S. Department of Education, 2004, April 28) and the *User's Guide to Preparing Submissions for the NCLB Standards and Assessments Peer Review* (U.S. Department of Education, 2005, May).

To address the second research question, the study authors focused on the development and implementation issues identified by external peer

reviewers and U.S. Department of Education staff in their evaluations of state compliance with the act's assessment requirements. The key documents reviewed for this purpose were the decision letters on state final assessment systems under Title I of the Elementary and Secondary Education Act as amended by the NCLB Act of 2001 (see appendix C for a comprehensive list of letters by state).

Of the 109 decision letters retrieved from the U.S. Department of Education through the end of February 2007—each letter representing the results of a peer review session—87 requested that states submit additional evidence before the state system could be approved. The last posted letter to each state was also reviewed to identify the state's current approval category. These categories were outlined in a letter to chief state school officers on April 24, 2006 (see box 1 in the main report for a description of each approval category). States receiving *full approval* or *full approval with recommendations* met all statutory and regulatory requirements. All other approval categories indicated that further action was required to address unresolved issues outlined in the “Remaining issues for states to consider” section of the decision letter.

Additional data to address the second and third research questions came from telephone interviews with the state assessment director from each of the seven states in the Central Region. These interviews, which lasted approximately 30 minutes, were designed to determine which issues raised by the peer reviewers continued to require consideration and to gain insight into the experiences of states in meeting the NCLB requirements (see appendix D for a copy of the interview protocol).

The senior researcher conducted all seven interviews by telephone, taking scripted notes (semi-verbatim). A semistructured interview format was chosen to elicit information on only the issues that the state assessment director deemed most salient. Throughout the interview, the researcher probed for additional issues until it was clear that all issues perceived as significant by the state

assessment director had been noted and fully articulated.

Analytic strategies

In addressing the first research question, the two documents prepared by the U.S. Department of Education to guide states through the standards and assessment peer review process were reviewed to identify the statutory and regulatory NCLB requirements for *full approval*. The seven components of state standards and assessment systems required under the act and their associated critical elements identified in this study reflect the two definitive official guidance documents. Peer review decision letters provided examples of the evidence needed to demonstrate that a state's system included these critical elements. In providing examples of evidence, the decision letters did not suggest additional requirements, but rather clarified the requirements stated in the official guidance documents. Together, these data sources were used to develop a list of NCLB requirements for state assessment systems as mandated in policy *and* implemented in practice by the peer review teams. This list was used in turn to create the key requirements checklists in appendix B.

To answer the second research question, the researcher reviewed the 109 decision letters posted to the U.S. Department of Education web site through February 2007 to compile a comprehensive list of the issues raised by reviewers since the approval process began. States received at least one and sometimes as many as four decision letters as they progressed through the review process. The researcher counted each letter that included a request for additional evidence as an issue that required additional time, attention, or resources on the part of states to resolve. A total of 87 letters included issues to be addressed.

Each decision letter grouped issues by the seven required assessment system components. For example, a request for evidence of "performance level descriptors" would be listed under academic achievement standards. Variations in the detail

provided by peer reviewers for the specific issues within each of the seven components necessarily limited the final analyses to the level of the seven required components. The researcher was thus able to report the relative frequency with which each of the seven components was identified by reviewers as an area in which issues remained (see figure 1 in the main report) and to provide some examples of the issues raised but not to quantify or analyze the individual issues.

After identifying any outstanding issues remaining in the last posted state decision letters, the narrative data from interviews with the state assessment directors in the seven Central Region states were reviewed to determine which issues had since been resolved and which, if any, continued to require consideration.

To address the third question, the interviewer compiled a comprehensive list of challenges identified by the state assessment directors in the Central Region, grouping them into three overarching categories. State assessment directors were encouraged to raise the issues they felt were most salient for their state. Not all seven Central Region states mentioned challenges in each of the three overarching areas, reflecting differences in their preparation and capacity at the time. The researcher did not seek verification of the placement of individual challenges within the broader categories from a second researcher.

Limitations

The data for this study are limited to official NCLB documents, the peer review decision letters posted on the U.S. Department of Education web site through February 2007, and interviews with state assessment directors in the seven Central Region states.

One limitation of this study is that the issues and challenges faced by states at this stage of the approval process may differ from the issues and challenges they might encounter later. As of February 2007, 20 states had received *full approval* (or

full approval with recommendations) for their state standards and accountability systems. It is thus possible that the 29 states that were designated as *approval expected*, *approval pending*, or *approval pending, mandatory oversight* could encounter other issues and challenges that would delay their approval or alter their status if they do not show compliance by the assigned deadlines. And issues and challenges faced during the later stages of the approval process may differ from those presented here as states come up against the final deadlines for complying with federal regulations.

A second limitation involves the sampling frame for the interviews conducted with state assessment directors. The Central Regional Educational

Laboratory chose to examine the issues faced by all 52 states and jurisdictions to provide a national context but to conduct interviews with state assessment directors in just the seven Central Region states to shed light on local challenges. The challenges identified by the state assessment directors in the Central Region may thus not reflect those of the nation as a whole.

Another potential limitation is the decision to use only one researcher to review all the documents and conduct the interviews and analysis. While critical collegial review was obtained throughout the process, using more than one researcher could have brought additional perspectives to the work.

APPENDIX B**KEY REQUIREMENTS CHECKLISTS**

This appendix presents seven detailed checklists, one for each of the required components for state assessment systems under the No Child Left Behind Act of 2001. The checklists reflect the report

authors' understanding of NCLB requirements for state standards and assessment systems based on their reading of the official documentation and their review of the results of the peer review process.

Checklist 1**Academic content standards***Overview*

To establish a foundation for a high quality assessment and accountability system under the NCLB Act, states must develop a set of challenging academic content standards that define what all public school students in the state are expected to know and be able to do.

The academic content standards form the basis for the achievement standards (including performance descriptors) and all assessments.

Key requirements checklist

- Content standards are to be applied to all public elementary and secondary school students for every grade and content area assessed.
- Content standards must be formally adopted for:
 - Reading/language arts and mathematics content standards in each of grades 3–8, and the 10–12 grade span.
 - Science content standards for the 3–5, 6–9, and 10–12 grade spans.
- Content standards must be challenging and encourage the teaching of advanced skills (higher-order thinking skills).
- Content standards must be coherent (content that is appropriate for each grade level with a clearly articulated progression across grade levels).
- Development of the content standards must involve a diverse group of education stakeholders.

Checklist 2

Academic achievement standards

Overview

To establish a level of achievement expected of all public schools and local education agencies, the NCLB Act requires states to develop a set of challenging academic achievement standards for every grade and content area assessed.

The academic achievement standards are the basis for determining adequate yearly progress.

Key requirements checklist

- Achievement standards are to be applied to all public elementary and secondary school students for every grade and content area assessed.
- Achievement standards must be formally adopted for each grade and content area combination:
 - Reading/language arts and mathematics achievement standards in each of grades 3–8, and the 10–12 grade span.
 - Science achievement standards for the 3–5, 6–9, and 10–12 grade spans.
- Achievement standards must be aligned with the content standards (capture the full range and depth of knowledge and skills).
- Achievement standards must ensure inclusion of students with disabilities and students not yet proficient in English.
- Achievement levels for each grade and content area combination must include at least three achievement levels, two indicating high achievement and one indicating basic or not yet proficient.
- Performance descriptors must clearly define the competencies associated with each achievement level.
- Cutscores must differentiate between the achievement levels.
- If the state assessment system includes alternate assessments for students with the most significant cognitive disabilities, student achievement may be measured against alternate achievement standards. Criteria for identifying eligibility for participation in alternate assessments must be provided.¹
- Development of the achievement standards must involve a diverse group of education stakeholders. Special attention should be given to including individuals knowledgeable about the various categories of special needs students.

1. The U.S. Department of Education issued final regulations setting out the authority and requirements for developing modified achievement standards and aligned assessments for certain students with disabilities on July 20, 2007, after the study was concluded. The use of alternate assessments that measure achievement against alternate standards requires the same level of documentation as regular assessments for all seven NCLB requirements.

Checklist 3

Statewide assessment system

Overview

To ensure that states are able to evaluate whether all students are achieving high levels on an annual basis and that all students are on track to meet or exceed proficiency standards by 2013/14, the NCLB Act requires states to develop a single statewide system of high quality assessments.

Key requirements checklist

- All public elementary and secondary school students must participate in the assessment system for every grade and content area assessed.
- Assessment system must include annual testing in:
 - Reading/language arts and mathematics in each of grades 3–8, and the 10–12 grade span.
 - Science for the 3–5, 6–9, and 10–12 grade spans.
- Assessment system must ensure inclusion of students with disabilities and students not yet proficient in English.
- Assessment system must include an alternate assessment for students who are unable to participate in the regular assessment even with accommodations.
 - For most students, the results from the alternate assessment will be evaluated against the same grade-level achievement standards as the regular assessment.
 - For students with the most significant cognitive disabilities, states may define alternate achievement standards.¹
 - States may also develop alternate assessments for use with limited English proficiency students. Results from these assessments must be evaluated against the same grade-level achievement standards as the regular assessment.
- Assessments may be either a criterion-referenced test or an augmented norm-referenced test with additional items to accurately measure the depth and breadth of the state content standards. Assessments must express results in terms of the achievement standards.
- Assessment system may include statewide assessments, a combination of statewide and local assessments, or only local assessments.
- All assessments—including local assessments—must meet the NCLB criteria for technical quality and alignment.
- Assessment system must be coherent across grade levels and content areas (articulated across grades but not necessarily vertically scaled).
- Development of the assessment system must involve a diverse group of education stakeholders.

1. The U.S. Department of Education issued final regulations setting out the authority and requirements for developing modified achievement standards and aligned assessments for certain students with disabilities on July 20, 2007, after the study was concluded. The use of alternate assessments that measure achievement against alternate achievement standards requires the same level of documentation as regular assessments for all seven NCLB requirements.

Checklist 4

Technical quality

Overview

To ensure that all assessments are of high quality and the use of results appropriate, credible, and technically defensible, the NCLB Act requires states to employ the processes described in *Standards for Educational and Psychological Testing* (American Psychological Association, 1999).

Key requirements checklist

- Validity of all assessments should be tested using traditional methods and with special consideration of intended and unintended uses of each assessment. Validation efforts should continue throughout the life of the assessment.
- Reliability of all assessments should be tested using traditional measures of reliability coefficients and standard errors of measurement and using actual measures of the precision in cutscores, accuracy of score changes from year to year, and the consistency of student subgroup classification.
- The assessment must be accessible, fair, and nonbiased for all students, including students with disabilities and students with limited English proficiency.
 - States must provide an equal opportunity for all students to fully demonstrate their knowledge and skills through the use of accommodations or alternate assessments. They must also specify the training educators will receive in the appropriate selection and administration of both.
 - States must establish clear criteria for administering, scoring, analyzing, reporting, and monitoring to ensure ongoing quality (test security policies, training and monitoring plans, and management controls).
 - States must promote equal (nonbiased) treatment of students by reviewing the interpretation or use of results on an ongoing basis to ensure that valid inferences are being made.
- Comparability of results must be demonstrated by equating or linking studies for different test versions (other translations) or formats (computer versus paper-and-pencil) and making a reasonable effort to attain comparability of results from year to year, student to student, and school to school.

Checklist 5 Alignment

Overview

To ensure that a state's standards and assessment system provides valid information to make accountability decisions and improve education, the NCLB Act requires an alignment of academic content standards, academic achievement standards, and assessments.

Key requirements checklist

- A coherent approach to ensure alignment between each assessment and the content and achievement standards it is designed to measure requires diverse stakeholder involvement, ongoing quality control reviews, reports of alignment studies, and procedures for maintaining the alignment over time.
- Standards and assessments must be aligned so that the assessments are as demanding as the content standards, representing the difficulty and the full range of cognitive complexity.
- Standards and assessments must be aligned in content (knowledge) and process (skills).
- Standards and assessments must be aligned in the degree and pattern of emphasis (if the academic content standards emphasize operations, then the assessments should as well).
- Assessments must yield scores that reflect the full range of the state's academic achievement standards (basic, proficient, and advanced).
- How standards and assessments are aligned must be communicated to education stakeholders so they can understand and use information from the assessments effectively.
- Alignment must be confirmed after full implementation and reverified after changes to either the standards or the assessments.

Checklist 6 Inclusion

Overview

To ensure that a state's assessment system applies the standards to all students, including those with disabilities and those not yet proficient in English, the NCLB Act requires states to decide how an individual student will participate in the system, not whether the student will participate.

Key requirements checklist

- Participation data, disaggregated by subgroup, must be provided to show that all students in the required grades or grade spans are included in the assessment, with or without accommodations.
- At least one alternate assessment must be developed for students unable to participate in the regular assessment even with accommodations. It must be aligned with the state's academic content standards and based on either:
 - The regular achievement standards (for limited English proficient students and students with disabilities).
 - Alternate achievement standards (for students with the most significant cognitive disabilities).
- If alternate achievement standards are adopted for students with the most significant cognitive disabilities, states must provide:
 - Guidelines for Individualized Education Program teams to use in identifying which students should be assessed with alternate achievement standards.
 - Documentation on how the state developed, communicated, and promoted the use of appropriate accommodations.
 - Procedures to ensure that personnel receive training in administering all assessments, including making accommodations.
- Guidelines for including all students with limited English proficiency in the required test grades must address:
 - Allowable accommodations.
 - Whether assessments are provided in the language and form most likely to yield accurate and reliable information.
 - Whether the state requires participation of all limited English proficiency students regardless of how long they have been enrolled in U.S. schools.
 - Whether limited English proficiency students must be assessed on reading/English language arts standards in English if they have been enrolled in U.S. schools for three or more consecutive years.
- Policies, guidelines, and practices must be developed for identifying and including migrant, homeless, and other mobile students no matter how long these students have been enrolled in the state.

Checklist 7

Reporting

Overview

To ensure that parents, educators, and other stakeholders can find out how well a student or group of students is doing on the assessment and how to improve student achievement, the NCLB Act requires that a state's assessment system include adequate reporting.

Key requirements checklist

- Sample reports at the student, school, district, and state levels must include:
 - Total scores aligned with academic content standards.
 - Total scores reported according to the performance levels defined in the academic achievement standards.
 - Performance by subgroup on school, district, and state reports (unless the subgroup is too small to yield statistically reliable information or would identify individual students).
- Individual student reports must be accompanied by an interpretive guide or training to help parents and educators understand and use the information to address students' specific academic needs. Such guides must be accessible to all parents (appropriate reading level, language, and format).
- Reports must be produced and disseminated as soon as possible after each assessment administration and before the beginning of the following school year.
- Policies and procedures must be in place for safeguarding and limiting access to individual student assessment data, including any data files released for research purposes.

APPENDIX C

PEER REVIEW DECISION LETTERS

| State | Date of letter |
|--------------------------------------|--------------------|
| Alabama (first decision letter) | November 10, 2005 |
| Alabama (second decision letter) | June 29, 2006 |
| Alaska (first decision letter) | January 25, 2006 |
| Alaska (second decision letter) | June 12, 2006 |
| Alaska (third decision letter) | September 13, 2006 |
| Arizona (first decision letter) | March 30, 2006 |
| Arizona (second decision letter) | June 30, 2006 |
| Arkansas (first decision letter) | June 22, 2006 |
| Arkansas (second decision letter) | December 19, 2006 |
| California | June 28, 2006 |
| Colorado (first decision letter) | March 23, 2006 |
| Colorado (second decision letter) | June 27, 2006 |
| Colorado (third decision letter) | December 18, 2006 |
| Connecticut (first decision letter) | May 22, 2006 |
| Connecticut (second decision letter) | December 19, 2006 |
| Delaware | March 10, 2006 |
| District of Columbia | June 29, 2006 |
| Florida (first decision letter) | April 19, 2006 |
| Florida (second decision letter) | June 28, 2006 |
| Georgia | June 30, 2006 |
| Hawaii (first decision letter) | March 24, 2006 |
| Hawaii (second decision letter) | June 29, 2006 |
| Hawaii (third decision letter) | October 27, 2006 |
| Idaho (first decision letter) | December 9, 2005 |
| Idaho (second decision letter) | June 28, 2006 |
| Idaho (third decision letter) | November 16, 2006 |
| Illinois (first decision letter) | June 23, 2006 |
| Illinois (second decision letter) | September 8, 2006 |
| Indiana (first decision letter) | March 21, 2006 |
| Indiana (second decision letter) | June 28, 2006 |
| Iowa (first decision letter) | March 30, 2006 |
| Iowa (second decision letter) | June 28, 2006 |
| Iowa (third decision letter) | November 29, 2006 |
| Kansas (first decision letter) | March 24, 2006 |
| Kansas (second decision letter) | June 27, 2006 |
| Kansas (third decision letter) | September 28, 2006 |
| Kentucky (first decision letter) | May 4, 2006 |
| Kentucky (second decision letter) | June 22, 2006 |
| Louisiana | June 29, 2006 |
| Maine (first decision letter) | April 7, 2006 |

| State | Date of letter |
|--|--------------------|
| Maine (second decision letter) | June 29, 2006 |
| Maine (third decision letter) | December 20, 2006 |
| Maryland (first decision letter) | June 17, 2005 |
| Maryland (second decision letter) | June 12, 2006 |
| Massachusetts (first decision letter) | June 12, 2006 |
| Massachusetts (second decision letter) | October 19, 2006 |
| Massachusetts (third decision letter) | February 28, 2007 |
| Michigan (first decision letter) | March 23, 2006 |
| Michigan (second decision letter) | June 20, 2006 |
| Michigan (third decision letter) | September 13, 2006 |
| Minnesota (first decision letter) | March 22, 2006 |
| Minnesota (second decision letter) | June 22, 2006 |
| Minnesota (third decision letter) | November 6, 2006 |
| Mississippi | June 30, 2006 |
| Missouri | June 20, 2006 |
| Montana (first decision letter) | May 18, 2006 |
| Montana (second decision letter) | June 22, 2006 |
| Montana (third decision letter) | October 3, 2006 |
| Montana (fourth decision letter) | March 2, 2007 |
| Nebraska (first decision letter) | December 9, 2005 |
| Nebraska (second decision letter) | June 30, 2006 |
| Nebraska (third decision letter) | September 15, 2006 |
| Nevada (first letter) | March 21, 2006 |
| Nevada (second letter) | June 20, 2006 |
| New Hampshire | June 27, 2006 |
| New Jersey | June 27, 2006 |
| New Mexico (first letter) | May 8, 2006 |
| New Mexico (second letter) | June 22, 2006 |
| New York | June 27, 2006 |
| North Carolina (first letter) | June 17, 2005 |
| North Carolina (second letter) | June 29, 2006 |
| North Dakota | June 22, 2006 |
| Ohio (first letter) | June 27, 2006 |
| Ohio (second letter) | November 15, 2006 |
| Oklahoma | June 30, 2006 |
| Oregon (first letter) | January 25, 2006 |
| Oregon (second letter) | June 22, 2006 |
| Pennsylvania (first letter) | May 8, 2006 |
| Pennsylvania (second letter) | June 20, 2006 |
| Pennsylvania (third letter) | April 2, 2007 |

| State | Date of letter |
|--------------------------------|-------------------|
| Puerto Rico (first letter) | June 29, 2006 |
| Puerto Rico (second letter) | March 21, 2007 |
| Rhode Island | June 23, 2006 |
| South Carolina (first letter) | June 17, 2005 |
| South Carolina (second letter) | February 15, 2006 |
| South Dakota (first letter) | October 25, 2005 |
| South Dakota (second letter) | May 23, 2006 |
| South Dakota (third letter) | June 29, 2006 |
| South Dakota (fourth letter) | November 22, 2006 |
| Tennessee | April 24, 2006 |
| Texas (first letter) | June 17, 2005 |
| Texas (second letter) | June 22, 2006 |
| Texas (third letter) | October 27, 2006 |
| Utah | May 8, 2006 |
| Vermont | June 28, 2006 |

| State | Date of letter |
|-------------------------------|-------------------|
| Virginia (first letter) | March 22, 2006 |
| Virginia (second letter) | June 28, 2006 |
| Virginia (third letter) | August 31, 2006 |
| Virginia (fourth letter) | February 27, 2007 |
| Washington (first letter) | May 5, 2006 |
| Washington (second letter) | June 22, 2006 |
| Washington (third letter) | December 21, 2006 |
| Washington (fourth letter) | March 30, 2007 |
| West Virginia (first letter) | June 17, 2005 |
| West Virginia (second letter) | June 26, 2006 |
| Wisconsin (first letter) | June 29, 2006 |
| Wisconsin (second letter) | February 12, 2007 |
| Wyoming (first letter) | May 10, 2006 |
| Wyoming (second letter) | June 22, 2006 |

APPENDIX D
INTERVIEW PROTOCOL

Date: _____

Length of Interview: _____ mins

State: _____

Contact Person: _____

Phone Number: _____

Interviewer: _____

In preparation for the interview, review the decision letters for the state and note:

A. Current approval status: _____

B. Outstanding issues per last posted letter, dated:

As you know from the introductory email you received from your McREL state liaison, I am conducting a study for McREL. The purpose of study is to prepare a report that provides guidance to states as they continue to develop and implement their state assessment systems to meet the requirements of No Child Left Behind (NCLB).

As part of the study, I am interviewing each of the assessment directors for the states in the Central Region to talk about the issues they are dealing with in gaining approval of their assessment systems under NCLB.

1. To begin, could you briefly outline your state's timelines for developing, submitting, and revising plan for state system?

(Interviewer: Listen for required elements of state assessment system that were already in place.)

2. What issues or challenges has your state faced during this process?

(Interviewer: Probe for additional issues until none remain.)

2a. Were you able to resolve these issues? If yes, how?

3. What issues are still unresolved at this time?

(Interviewer: Probe for additional issues until none remain.)

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