

Forum on Educational Accountability

www.edaccountability.org

July 19, 2007

The Honorable George Miller
Chair, Committee on Education and Labor
United States House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

The education, civil rights and other organizations that have signed the Joint Organizational Statement on NCLB and that are active in the Forum on Educational Accountability (FEA) are pleased to see that the House Education Committee will be taking up many of the key issues surrounding NCLB, as indicated in your letter to first year members of Congress.

In conjunction with your recommendations, as well as FEA's Joint Statement (now signed by 138 national education, civil rights, religious, disability, civic and labor organizations representing more than 50 million Americans) and the FEA legislative recommendations, we hope that members of the Committee and Congress will consider the following points as you work to re-authorize the law:

1. Growth models: Adopt the Joint Statement's recommendation on growth models by replacing the law's arbitrary proficiency targets with ambitious achievement targets based on rates of success actually achieved by the most effective public schools. FEA legislative recommendations and the report of the Expert Panel on Assessment specify how to accomplish this. All "growth models" approved to date by the U.S. Department of Education are limited by the requirement of 100% proficiency by 2014 and by "Adequate Yearly Progress"; this should not be the case in a reauthorized law.

2. Multiple sources of evidence (measures) and local assessments: Adopt the Joint Statement recommendation on multiple measures by helping states develop assessment systems that include district and school-based assessments. Multiple measures and local assessments are already permitted under NCLB. For example, Nebraska's system for accountability, which includes only local assessments that have met stringent state criteria, has received provisional approval from the U.S. Department of Education, the current status of most states. Though the law need not be changed to allow such a system - and should not be changed to limit such systems - financial support must be provided to help states develop locally-based assessment systems that include multiple kinds of assessments. Such efforts should focus on assessments that first help

teachers to teach better, and secondly contribute, when they are technically adequate, to accountability information.

In addition, the inclusion of other sources of evidence such as results in other subjects or grade promotion rates can counter the danger of narrowing curriculum to two subjects, an issue that has riled parents and communities across the nation. By using well-constructed weighting systems, the proper strong focus on reading and math can be retained.

3. Growth and multiple measures: The Joint Statement supports combining growth models and multiple, largely local, measures. Growth models make sense, but if they do not include multiple sources of evidence, they will have the same failings as current statewide standardized tests - failure to assess higher order learning, measuring a limited slice of the curriculum, and fostering narrow teaching to the test.

4. Improve test quality: The reauthorized law should direct funding toward assessments that help improve teaching and learning (as in point 2, above). Annual statewide tests do not and cannot do much on that, while "interim" or "benchmark" mini-tests share and often intensify the failings of state exams noted in point 3.

5. Flexible interventions: FEA recommends that schools be held accountable for implementing systemic reforms; targeted and intense assistance should be given to schools unable to implement locally guided systemic reforms and/or are not making sufficient progress. This connects your point on improving the teaching force, since high-quality professional development (and the use of high-quality classroom assessments) improves teaching and learning.

The signers of the Joint Statement and FEA recommendations believe it is essential to help all Title I schools succeed. Thus, our approach is to build in actions – systemic reforms – to accomplish that goal, rather than to wait for failure to make AYP.

6. Improved assessments for English language learners and students with disabilities: The FEA's Expert Panel on Assessment has detailed recommendations, under Principle III, for improving the assessment of these students. Multiple forms of assessment are also essential for these children. We strongly support continuing to include all children in accountability systems and the general curriculum, but in appropriate and educationally sound ways.

7. Funding: Fully fund Title I to ensure that 100 percent of eligible children are served and raise authorized levels of NCLB funding to cover a substantial percentage of the costs that states and districts will incur to carry out these recommendations, i.e., developing local assessment systems and professional

development. Fully fund the law at those levels without reducing expenditures for other education programs.

Thank you in advance for your consideration of our recommendations and for all that you do for our nation's public schools, students and teachers.

Sincerely,

A handwritten signature in black ink, appearing to read "Monty Neill". The signature is fluid and cursive, with the first name "Monty" written in a larger, more prominent script than the last name "Neill".

Monty Neill, Ed.D.
Chair, Forum on Educational Accountability
617-864-4810; monty@fairtest.org

- FEA is a working group from among the signers of the Joint Statement.
- The Joint Statement and the reports and legislative recommendations produced by FEA are on the web at www.edaccountability.org.