

Arizona Assessment Letter

June 30, 2006

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

Dear Superintendent Horne:

I am pleased to approve Arizona's assessment system under Title I of the *Elementary and Secondary Education Act of 1965* (ESEA), as amended by the *No Child Left Behind Act of 2001* (NCLB). I congratulate you on meeting this important NCLB requirement.

My decision is based on input from peer reviewers external to the U.S. Department of Education (the Department) and Department staff who reviewed and carefully considered the evidence submitted by Arizona. I have concluded that the evidence provided demonstrates that Arizona's standards and assessment system satisfies the NCLB assessment requirements. Specifically, Arizona's system includes academic content standards in reading/language arts, mathematics and science; academic achievement standards in reading/language arts and mathematics; alternate achievement standards for students with the most significant cognitive disabilities in those subjects; assessments in each of grades 3 through 10 in reading/language arts and mathematics; and alternate assessments for each subject. As such, the Arizona system will receive **Full Approval with Recommendations**. This status means that Arizona's standards and assessment system meets all statutory and regulatory requirements; however, some elements of the system could be improved. The Arizona Instrument to Measure Standards (AIMS) and Alternate (AIMS-A) meet the essential requirements of NCLB, but we recommend Arizona continue to strengthen its alternate assessment, expand the range of accommodations for English language learners, and address discrepancies in test participation rates.

To provide more detail, on the basis of the additional evidence provided by Arizona following the initial peer review, the Department concludes that the State's assessment system—that is, the reading/language arts and mathematics assessments in each of grades 3-8 and high school, as well as the alternate assessment and accommodations for both these subjects—meets all statutory and regulatory requirements. In particular, those assessments, with appropriate accommodations, provide a valid means for assessing the academic proficiency of English language learners. The Department strongly recommends, however, that Arizona consider expanding the range of accommodations for English language learners, including, but not limited to, linguistic accommodations such as simplified English translations of the mathematics and science assessments, and standardization of translations of directions by recording them on a CD. These accommodations are not in conflict with Arizona's English-only statutes and have proven to be effective and valid in other States. Arizona should also address student data discrepancies in the analysis of test participation rates (some participation rates are reported at 114%).

I note that Arizona has already begun this work and given the Department a timeline for improving these areas. Also, please note that Arizona's science assessments have not been submitted for peer review. Arizona will need to provide evidence for peer review before the end of the 2007-08 school year to receive approval for these assessments.

Please be aware that approval of Arizona's assessment system for Title I is not a determination that the system complies with Federal civil rights requirements, including Title VI of the *Civil Rights Act of 1964*, Title IX of the *Education Amendments of 1972*, Section 504 of the *Rehabilitation Act of 1973*, Title II of the *Americans with Disabilities Act*, and requirements under the *Individuals with Disabilities Education Act*. Finally, please remember that if Arizona makes significant changes in its assessment system, the State must submit information about those changes to the Department for review and approval.

Approval of Arizona's assessment system also does not resolve our outstanding monitoring issue regarding Arizona's use of the appeals process to affect determinations of adequate yearly progress based on the scores of English language learners who have not received instruction in English for at least three years. We will continue to work to resolve that issue.

We have found it a pleasure working with your staff on this review. Please accept my congratulations for your State's approved standards and assessment system under NCLB. I wish you well in your continued efforts to improve student achievement in Arizona.

Sincerely,
Henry L. Johnson

cc: Janet Napolitano