



National Assessment Governing Board

National Assessment of Educational Progress

May 18, 2001

The Honorable Rod Paige
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, DC 20202

Dear Secretary Paige:

On behalf of the National Assessment Governing Board, I want to thank you for your May 10 presentation on President Bush's "No Child Left Behind" proposal and the discussion with the Board that ensued.

I am certain that the Board Members appreciated your comments on the role President Bush envisions for the National Assessment of Educational Progress (NAEP) under the accountability provisions of "No Child Left Behind"-that the National Assessment should be used only as confirmation of state results and should be the only external assessment used to confirm state results. If instead, many different tests were used to confirm state results, there would be no way of knowing with confidence how student achievement is improving.

You also suggested that the Governing Board prepare a document describing policy positions it has adopted that bear on the "No Child Left Behind" proposal. Those policy positions, with explanatory text, follow below. The "No Child Left Behind" proposal will affect the NAEP legislation, which is scheduled for reauthorization during this Congress. Other important issues, such as the independence of NAEP and the Governing Board, subjects to be covered, and incentives for participation will need to be addressed in reauthorization, but are not addressed in this letter. Some of these issues will become even more important with passage of the President's plan, and the Board will be ready to comment on these.

1. The primary purpose of the National Assessment is to measure and report national and state progress in student achievement.

The state-level achievement award program under the "No Child Left Behind" proposal is premised on state-level gains in student achievement over time as measured by state test results and confirmed by the National Assessment. The National Assessment is uniquely situated to fulfill this confirmatory role. It is specifically designed to measure change over time and provide results in terms of group performance at the national and state levels. States and local schools currently use many different tests. These different tests vary considerably. The results of different tests cannot simply be "added up" to get a state-level or national score. Nor can a mix of tests be depended upon to provide an accurate portrayal of change in achievement over time. The National Assessment is the only way for the public to know with accuracy how American student achievement is changing nationally and state-by-state.

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2. The state's own test results should be the primary basis for rewards and sanctions under the "No Child Left Behind" proposal. The National Assessment should be used only to confirm state results.

Accountability under "No Child Left Behind" at the school, district and state levels is based first and foremost on the state's system of standards and assessments. Rewards and sanctions at the school and district levels are to be based solely on the state assessment system. The National Assessment plays no role whatsoever in accountability at the school and district levels. The incentive for schools and districts is to follow the requirements of state standards and tests, not the National Assessment. Thus, the National Assessment serves as an effective, independent measure of student achievement at the state level that can be used with confidence as confirmatory evidence of statewide results on the state's tests. In fact, more than 40 states have participated in the National Assessment and many states use their National Assessment results informally for this purpose.

3. The National Assessment will provide results within six months of testing.

Under the Governing Board's redesign policy, the National Assessment is expected to provide initial results within six months after the completion of testing. Plans are underway to simplify the design of the National Assessment and streamline test administration and reporting procedures to achieve the goal of reporting results in six months by the 2002-2003 school year in reading and mathematics, the base year for measuring progress under the "No Child Left Behind" proposal.

4. A "reasonable person" standard, not strict tests of statistical significance, should be applied in using the National Assessment to confirm state results.

Under the "No Child Left Behind" proposal, each state is to have its own content standards and performance standards, and its own tests aligned with those standards. Each state is to have its own definition of "adequate yearly progress" against which progress in student achievement will be measured on the state system of tests. The resultant standards, tests, and definitions of "adequate yearly progress" will both vary among the states and also share many commonalities. Given these conditions, "confirmation" should not mean a point for point verification of state test results. Instead, the National Assessment results should be compared with the state test results using a "reasonable person" standard to see whether there is confirmation (or perhaps no disconfirmation) of the general direction of state results. For the year 2000 National Assessments in mathematics and science, 48 states volunteered to participate and, of these, 40 obtained cooperation of a sufficient sample of schools to receive state-level results. Although alignment between NAEP and state standards and assessments cannot be perfect, this high degree of interest suggests that states view the National Assessment as a fair representation of what students in their state know and are able to do. Based on simulations prepared by the Governing Board using state results and National Assessment data, the National Assessment can be used effectively in this confirmatory role when informed judgment is used to compare the data and a "reasonable person" standard is used in "confirming" the results.

5. Using the National Assessment to confirm results on state tests will not lead to a national curriculum.

Safeguards are in place to prevent the use of NAEP from leading to a national curriculum. First, Congress structured the Governing Board that oversees and sets policy for the National Assessment to ensure sensitivity to the sovereignty of states and the primacy of local control with respect to education governance. It is comprised primarily of state and local educators and policymakers: governors, state legislators, state and local school board members, chief state school officers, teachers and principals. These categories of membership ensure that decisions by the Board represent state and local perspectives. In addition, by law, the Board is mandated to conduct its work independent of the Department of Education. Thus, the very composition of the Board is a safeguard against a national curriculum arising from the National Assessment.

Another safeguard is in the process by which the content of each assessment is determined. The Governing Board conducts a national consensus process, consulting with teachers, principals, state and local curriculum experts and others. It includes a review of state curricula and standards. Consensus is a "bottom up" process that results in a distillation of state and local educational practice. It represents wide agreement on what should be in the National Assessment for assessment purposes, not a "top-down" prescription for learning.

The incentives built into the accountability provisions of "No Child Left Behind" provide yet another safeguard. Rewards and sanctions that states are to apply to schools and districts are based on the state tests. While there may be some incentive for states to attend to NAEP, the 48 states that signed up in 2000 indicate that states were interested in this before the "No Child Left Behind" proposal. The truly high stakes are at the school and district levels, where the incentive is to attend to state standards and assessments.

6. To reduce burden on teachers and schools, the costs of administering state NAEP should be shifted from states to the federal government. State NAEP, like national NAEP, should be administered by contractor and resources should be provided to states for coordination with the test contractor.

The Governing Board has recommended that the NAEP legislation be amended to permit contractor administration of state NAEP and to provide resources to states for coordination with the contractor. For the national sample, NAEP has been administered by a contractor for thirty years. However, for the state NAEP program, current law requires states to bear the costs of in-state coordination and test administration. As a result, local school staff administer NAEP to the state samples of students. Consistent with the Board's recommendation, the costs of state NAEP would be borne by the federal government under the "No Child Left Behind" proposal. Clearly, the Administration supports this policy and has included funds to support the shift in cost from the states in the President's budget request for FY 2002. This would be beneficial in easing administrative burden on states and in enlisting the participation of schools in state NAEP.

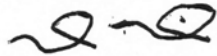
Conclusion

In order to implement the provisions of "No Child Left Behind" related to the National Assessment according to the timetable in both the House and Senate versions, preliminary planning cannot wait to begin until after enactment of the legislation. As a result, the Governing Board and the National Center for Education Statistics, in consultation with test experts, are examining the issues associated with the logistics/practicability of administering state NAEP annually in reading and mathematics in grades 4 and 8. This includes issues related to the design of the assessment, sampling, and costs. The Governing Board has scheduled a special meeting on June 28 to address these and other related issues. We will be happy to keep you apprised on the results as we proceed.

As discussed with you at the Board meeting, preparing for the implementation of "No Child Left Behind" in 2003 as the base year for accountability will involve a field test in 2002. Getting ready for the field test requires work in FY 2001 and funds are needed immediately. We appreciate your commitment to work to find additional funds for this purpose.

Thank you once again for your interest in and support of the National Assessment.

Sincerely,



Mark Musick
Chairman

Cc: Bill Hansen
Eugene Hickock