OFFICE OF PUBLIC INSTRUCTION
STATE OF MONTANA

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Superintendent

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The Honorable Arne Duncan
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Secretary Duncan:

Thank you for your leadership in promoting the new U.S. Department of Education's goals to ensure students are learning content based on high standards that are measured by quality assessments, that effective instructional practices are demonstrated in every classroom and visionary leadership is present in every school, that longitudinal data systems help states and districts to better inform educational policy and practice, and that all stakeholders work together to transform the lowest performing schools. While I do not agree with some components of your Department's implementation plan, I do support the overall goals that President Obama has established.

Montana's Office of Public Instruction has worked diligently to meet the new priorities outlined by your Department. My office has created a strong partnership with the school boards, educators, parents, communities, and students served by the federal School Improvement Grant. In addition, next month I will recommend the adoption of the Common Core State Standards to the Montana Board of Public Education. We are also a governing partner state in the SMARTER Balanced Assessment Consortium. Further, a state task force is currently making revisions to the Montana Accreditation Standards and, as a part of that revision process, is studying the implementation of an evaluation system of teachers and school leaders. Additionally, diligent work continues on our state longitudinal data system.

I was very encouraged by President Obama's support in his State of the Union speech for the reauthorization of the Elementary and Secondary Education Act (ESEA). I also applaud your recent meeting with several Montana educators, at the request of Sen. Jon Tester, to hear their views about the effects of federal education policy on rural schools. As you heard, congressional inaction on reauthorizing ESEA has led to many frustrations by Montana's educators. In the absence of a new bill, the Department continues to hold states and schools accountable under the current law although the ESEA accountability system does not conform to the Department's new priorities, particularly around growth models for student learning. This split in priorities, established under your leadership and those established in the current ESEA, has Montana reeling from additional data collection and uncertain about the path to continuous improvement. At the state

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education agency level, it is difficult to travel down two divergent paths given our limited capacity and resources. At the district level, particularly in a frontier state like Montana, it is difficult to meet increasing data collection such as that required under the State Fiscal Stabilization Funds that implement new federal priorities in addition to continuing to meet ESEA requirements.

It's important to point out that Montana's education system believes in accountability. In fact, I am very proud of our state's educational outcomes. Our students generally perform very well on the National Assessment of Educational Progress and our state assessment, and we confront our challenges where there is need for reform. We all hope that ESEA reauthorization occurs very soon, particularly when your priorities point to a different accountability model that could be put into place. Additionally, as we shift to college and career readiness goals, implement new common core standards and assessments, move from highly qualified teachers to highly effective instruction, and transform our lowest performing schools, we need some alleviation of the strict across-the-board, one-size-fits-all, absolute bar of 100 percent proficiency on state assessments. You understand that the unrealistic 100 percent goal undermines the work and morale of students and educators and the public's confidence in schools.

In order to hold the line during the transition from one accountability system to another, it is important not to penalize our schools while we wait for overdue congressional action, and instead, provide a stable accountability measure for our schools. Therefore, I write to inform you that I am delaying the scheduled increase of the Annual Measurable Objectives (AMOs). Our current AMOs of 83 percent for reading and 68 percent for math certainly provide high learning targets for measuring Adequate Yearly Progress (AYP). Maintaining these AMOs provides a high bar for students to meet and promotes goodwill to our schools while we engage in meeting new federal priorities and educational reform.

Also, increasing the AMOs would result in the identification of an additional number of schools needing improvement, and my office does not have the capacity to reach all of the identified schools and provide the assistance required under the current ESEA. Our office resources are better used to continue our work with schools already identified for assistance than to increase the number of schools that cannot be offered the required additional resources needed simply because they are identified in need of improvement by the outdated ESEA requirements.

Thank you for your continued work on the federal government's educational priorities. I look forward to our continued partnership as we move toward a new and improved ESEA.

Sincerely,

Denise Juneau

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State Superintendent of Public Instruction