Last year, when NAGB proposed to set achievement goals for each grade and subject on the NAEP exams, I strongly supported this activity in principle, and I still do. At the time, however, I also raised a number of concerns about NAGB's interpretation of this activity and its views about how to carry it out. In response to public comments, NAGB made a number of conceptual and other revisions in its proposal and, in my judgment, substantially improved it. By and large, however, NAGB did not revise its initial plan for how to set achievement levels, a process whose technical soundness and credibility are inseparable from the issue before us now, the soundness and credibility of the proposed achievement levels.

Although NAGB's proposed achievement-level setting process was not discussed much publicly, there were a number of reasons to believe that NAGB was keenly aware of how important that process was, both for the soundness of the achievement levels it yielded and the credibility of the NAEP data that would be reported on the basis of those levels. For one, NAGB demonstrated an understanding that setting achievement levels, that is, standards, is a complex activity in any case and especially so the first time around. It also seemed attuned to the potential problems of doing so with an assessment instrument not initially designed for this purpose. NAGB's attitude seemed to be, and commendably so, that its first
achievement-level setting effort would be viewed almost as a trial; the process didn’t have to be perfect, but it had to be good enough to warrant reporting out the results of the 1990 NAEP math assessment by achievement levels. Indeed, some of my initial concerns about NAGB’s plan for how to set the achievement levels were alleviated by what I took to be NAGB’s own provisional stance toward the outcome of the process. My own view was that a see-and-perhaps-wait stance was appropriate because, quite bluntly, the credibility of the first report of NAEP data on the basis of achievement levels could make or break the very legitimacy of setting achievement levels.

I was particularly encouraged when NAGB commissioned an independent evaluation of the achievement-level setting process and selected three of this nation’s most distinguished evaluation experts, Drs. Daniel Stufflebeam, Richard Yaeger and Michael Scriven, to conduct it. NAGB is to be commended for this move and thanked, as well, because an independent evaluation commissioned by a public body can improve the deliberations not only of that body but also the input of the wider public.

It was in part, I believe, due to the interim report of this evaluation that NAGB delayed taking action on establishing the achievement levels. My staff was unable to get a written copy of Dr. Stufflebeam’s interim report but I have read accounts of the oral report delivered by Dr. Stufflebeam to NAGB. In addition, as a member of the National Academy of Education and its Trial State NAEP Evaluation
Panel, I have read the record the Panel has been keeping on the achievement-level setting process. Both reports speak to the many technical and other problems encountered in developing the proposed math achievement levels for grades 4, 8 and 12. And both reports indicate that NAGB made a prudent decision when it delayed its final action on establishing the achievement levels.

That decision could not have been an easy one. NAGB is caught between its statutory responsibility to improve the form and use of NAEP and its desire to do so with all deliberate speed, on the one hand, and, on the other hand, by the testing and reporting schedule of NAEP, which does not move with great speed. Moreover, since we are soon to have the release of math NAEP data by state -- an unprecedented event that no doubt will get a lot of attention -- the temptation must have been great to go full speed ahead with setting achievement levels so that they could be available at or around the time the state-by-state NAEP data or the first report on our progress toward meeting the national education goals was released.

I therefore commend NAGB on its decision to delay establishing the achievement levels. And because I believe that the reasons that made delay prudent in the first instance have not gone away, I believe this decision should be deferred again until NAGB and the public are informed by: 1) both the interim and final Stufflebeam et al evaluation reports; and 2) the evaluation being conducted by UCLA’s Center for Research on Evaluation, Standards, and Student Testing and the RAND
Corporation for the National Center for Statistics, due, I believe, this February.

The basis of my recommendation for deferral is simple. I cannot give intelligent testimony on NAGB's proposed achievement levels without information about the adequacy of the procedures and process used to derive them. Nor do I believe that NAGB can make an intelligent and defensible final decision about the achievement levels without this information.

I and the others who have responded to the welcome opportunity NAGB has given us to comment can of course render an opinion on the proposed achievement levels, but that judgment would be based on criteria and processes other than the ones used to develop these proposed achievement levels. I, for one, could offer testimony based on what AFT members who teach math have told me about what the standards should be. Or I can offer judgments based on what I know about students' math performance in other advanced industrialized nations. These and any number of other frameworks for commenting on the proposed achievement levels I or someone else could use would all be legitimate. But they do not relate to the way the math achievement levels under consideration by NAGB were developed.

I therefore wonder how our testimony, no matter how compelling, could be used to modify the definitions of the proposed achievement levels in a way that would be technically defensible. Those levels, moreover, cannot now be viewed apart from the math NAEP items, which were not designed to
accommodate standard setting. The extent to which this process was successful is an important issue. Yet few, if any, individuals or groups that will offer NAGB testimony can speak to this issue because we are not privy to the math NAEP items. Only the evaluations can help us and NAGB, at least on a common basis.

I hardly believe that technical information alone will resolve this and other issues surrounding the setting of achievement levels. Nor am I making an argument that NAGB should not proceed with this important activity until perfection has been achieved. I am, however, saying that whether or not an unprecedented and controversial activity like this one becomes a routine part of the way we judge and make educational progress depends on its initial credibility among the American public, policymakers and educators. If the achievement level setting process does not pass reasonable muster, neither can the achievement levels and the NAEP data reported on this basis. And then the opportunity to do better the second and third and many more times around may be lost.

The best way NAGB has of ensuring the success and future of this activity is to be faithful to the spirit of openness and inquiry it demonstrated when it commissioned its independent evaluation. Waiting on the results of the evaluations and allowing the public to comment in light of those evaluations may indeed delay reporting out NAEP results by achievement levels according to the schedule NAGB has set. But the possibility of such a delay seems to me to be far less risky than moving forward in the dark. NAGB, through its own
good foresight, will soon have the information necessary to address important and legitimate questions about the proposed achievement levels. The AFT looks forward to the opportunity to review it.