MacSwan Response to CEP's Reply

The Center on Education Policy (CEP) reply to my review makes two main objections:

1. CEP alleges that I "unduly simplified" its report by "playing down the extent to which [its authors] warn of the limitations of state test data for discerning how English language learners (ELLs) are achieving in school" (p. 1).
2. CEP claims that I "ignore the conclusion of the report" which includes specific policy recommendations based on "the very limitations mentioned" (p. 1).

These CEP criticisms do not arise out of any purported factual misstatements in my review. Instead, it projects very strong disapproval of the extent to which I found their warning about data quality adequate and compelling. The CEP reply goes so far as to suggest that my different point of view falls short of a completely "honest appraisal of the report," and alleges that I suggest that they engage in a kind of deception. No evidence is presented to support these allegations; rather, CEP believes that it is suggested by "the overall tone" of my review (p. 2).

Regarding the first of CEP's objections, my review did indeed note in its opening paragraph that CEP's report included specific conclusions regarding the limitations of the data; these conclusions were quoted directly, and they were alluded to throughout my review. However, my *actual* criticism on this point was not spelled out in CEP's reply: I argued that the CEP report lacked any empirical basis for drawing conclusions regarding the progress of ELLs, as it did, in light of the poor data quality. This was the key point I wanted readers to understand.

To illustrate, imagine that researchers sought to determine whether a new drug, Chemical X, had the effect of lowering cholesterol in a group of heart patients. Assume further that during the course of the study the researchers discovered that their data may reflect inaccuracies because all the blood tests were taken under conditions known to result in inaccurate cholesterol measurements. Conclusions based on an analysis of these data would not serve the interest of the public. In fact, the study should not be published. In my opinion, it is not adequate for the researchers to note data quality concerns in the context of their conclusions, because consumers of the study are unlikely to appreciate these concerns fully. Rather, data analysis should not proceed in light of the concerns. The same conclusion holds for the CEP report. Were their cautions important to include? Absolutely. But I concluded in my review that the data weaknesses were too great to justify publication, even with those cautions.

To be clear, my concern is that CEP "down played" the significance of data limitations by advancing conclusions about the academic success of ELLs in spite of them. Their original stated goal was "to determine whether ELLs have made progress across the achievement spectrum" (p. 4); of their eight conclusions, two noted data quality concerns and six drew specific conclusions regarding the progress of ELLs. For instance, based on a data showing changes from

2006 to 2008, the CEP report concludes, "In grade 4 reading and math, rising percentages of English language learners have reached three achievement levels—basic, proficient, and advanced—although gains are less prevalent at the advanced level in reading …" (p. 9-10). If we know in advance that the data for each year reflect different groups of students, and if we also know that tests were administered in a language the students may not have known, how can we draw conclusions about gains or losses over time? Doing so, it seems to me, seriously down plays, even *ignores*, the significance of the limitations of the data noted in the CEP report itself.

CEP's second major criticism of my review is that I "ignore the conclusion of the report" which includes specific policy recommendations about how to improve data quality for ELLs. CEP's reply lists four specific conclusions they believe should have been noted, but were not. However, while it may have been an expository improvement in my review to say so explicitly, the conclusions in the CEP report counted only as conjecture since the findings were not substantiated, and therefore were not much worth discussing.

Furthermore, it is important to note that CEP's reply to my review summarizes its critical conclusions in much stronger and direct language than did the original report. For instance, CEP's reply represents that the report noted that "[c]urrent methods of determining adequate yearly progress (AYP) under No Child Left Behind (NCLB) are problematic for this subgroup of students, and should be changed" (p. 2). However, in the original report, that caution, to the extent it is discernable at all, is deeply embedded among specific conclusions about the progress of ELLs:

> As this study has shown, the percentages of English language learners meeting achievement benchmarks increased between 2006 and 2008, according to the state tests used for NCLB accountability. Still, in many states the percentages of ELLs reaching the proficient level in reading and math remain quite low. In the near future, schools and districts could conceivably continue to make AYP for this subgroup through a combination of NCLB's safe harbor provision and their state's use of confidence intervals. But sticking with the current methods of determining AYP skirts the issue of whether it is wise to have an unattainable goal of 100% proficient, particularly for this subgroup (p. 15).

Similar remarks could be made about the other three purportedly neglected conclusions in the original report.