

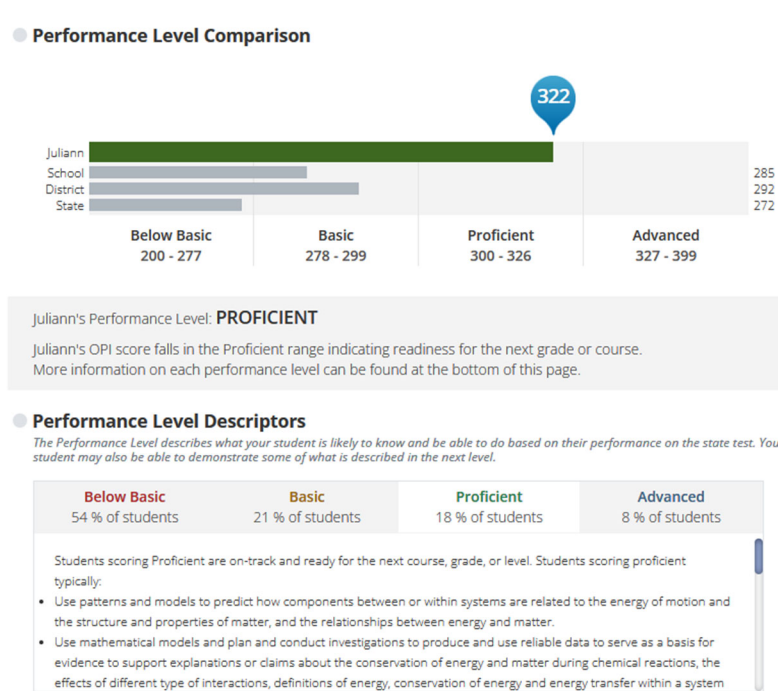


OKLAHOMA STATE
DEPARTMENT of EDUCATION

To: Superintendent Ryan Walters and other Members of the State Board of Education
From: Cora James, Assistant Division Administrator, Assessments
Bryan Cleveland, General Counsel
Date: April 27, 2023
Re: Waiver for Lexile and Quantile Requirements of OAC 210:10-13-1.1

The State Board of Education currently requires the State Department of Education to use the Lexile and Quantile scores on student level reports in grades 3-8. OAC 210:10-13-1.1(d)(3)(B); *id.* (d)(4)(A). Lexile and Quantile are copyrighted terms for products that are solely offered by the company Meta Metrics. The Department has concerns about the requirement and is seeking a waiver from the Board of this requirement for the 2023-2024 fiscal year.

Oklahoma law calls for both norm-referenced and criterion-referenced scores to be reported. 70 O.S. § 1210.508(C)(3). To meet the required norm-referenced requirement, the Department provides student comparisons at the state, district, and school levels. This comparison is normed against the state. See an example below.



As required by Board rules, the Department also provides a Lexile and Quantile score in grades 3-8. These scores are not used in any reporting beyond appearing on individual student reports. This requirement was likely intended to be a nationally-normed reference, but because of the logistics of aligning the Quantile and Lexile scales against unique state standards, the comparability across states is lost.

The Department also has several other concerns with using those scores:

- The scores are not intended to be instructionally useful, which results in significant misunderstandings with teachers and districts.
- While the scores were developed by Meta Metrics, other vendors have developed independent calculations of Lexile scores, resulting in confusion with teachers as their instructional Lexile tools do not match with the ones used on state assessments.
- The scores can only be used relative to prior years scores as a growth indicator within Oklahoma.
- Meta Metrics has licensed their tools to other vendors who are making false claims to districts regarding their tools being predictive of state summative assessment Lexile and Quantile scores
- Meta Metrics has increased their prices, which were already significant.

From a legal perspective, the Department also observes that state law does not require the use of Lexile and Quantile and that it is solely a Board rule requiring the use of those products. Thus, the Department is seeking a waiver so that it can continue using other norm-referenced scores without Quantile and Lexile for the 2023-2024 fiscal year. The Department also intends to notice an amendment to the rule that would remove Quantile and Lexile for subsequent years.