
ESEA Flexibility

Peer Panel Notes



State Request: Florida

Date: 12/8/11

Note: These peer comments reflect the views of the seven peers that comprised the panel that reviewed the SEA's initial submission as well as any additional materials provided by the SEA prior to and during the December 5–9, 2011 on-site peer review. Taking these comments into consideration, the U.S. Department of Education provided feedback to the SEA about aspects of the SEA's ESEA flexibility request that needed additional development or clarification. These peer notes do not reflect the peers' views on any materials, clarifications, or modifications received from the SEA following the peer review. Moreover, although the peer notes inform the Secretary's consideration of each SEA's request, the Secretary makes the final decision whether to grant an SEA's request for ESEA flexibility. For both of these reasons, these peer notes may not align with the determination made by the Secretary.

REVIEW AND EVALUATION OF REQUESTS

The U.S. Department of Education (Department) will use a review process that will include both external peer reviewers and staff reviewers to evaluate State educational agency (SEA) requests for this flexibility. This review process will help ensure that each request for this flexibility approved by the Department is consistent with the principles, which are designed to support State efforts to improve student academic achievement and increase the quality of instruction, and is both educationally and technically sound. Reviewers will evaluate whether and how each request for this flexibility will support a comprehensive and coherent set of improvements in the areas of standards and assessments, accountability, and teacher and principal effectiveness that will lead to improved student outcomes. Each SEA will have an opportunity, if necessary, to clarify its plans for peer and staff reviewers and to answer any questions reviewers may have during the on-site review. The peer reviewers will then provide comments to the Department. Taking those comments into consideration, the Secretary will make a decision regarding each SEA's request for this flexibility. If an SEA's request for this flexibility is not granted, reviewers and the Department will provide feedback to the SEA about the components of the SEA's request that need additional development in order for the request to be approved.

This document provides guidance for peer review panels as they evaluate each request during the on-site peer review portion of the review process. The document includes the specific information that a request must include and questions to guide reviewers as they evaluate each request. **Questions that have numbers or letters represent required elements.** The italicized questions reflect inquiries that reviewers will use to fully consider all aspects of an SEA's plan for meeting each principle, but do not represent required elements.

In addition to this guidance, reviewers will also use the document titled *ESEA Flexibility*, including the definitions and timelines, when reviewing each SEA's request. As used in the request form and this guidance, the following terms have the definitions set forth in the document titled *ESEA Flexibility*: (1) college- and career-ready standards, (2) focus school, (3) high-quality assessment, (4) priority school, (5) reward school, (6) standards that are common to a significant number of States, (7) State network of institutions of higher education, (8) student growth, and (9) turnaround principles.

Review Guidance

Consultation

1. Did the SEA meaningfully engage and solicit input on its request from teachers and their representatives?

- *Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of teachers and their representatives at the outset of the planning and implementation process?*
- *Did the SEA indicate that it modified any aspect of its request based on input from teachers and their representatives?*

CONSULTATION QUESTION 1 PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none"> • Florida took a comprehensive and swift approach to engaging educators in consultation regarding their flexibility request.
<i>Strengths</i>	<ul style="list-style-type: none"> • Extensive and systematic outreach to educators is documented • E-mails sent to all teachers in the state, including charters and virtual school teachers.
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	No text

2. Did the SEA meaningfully engage and solicit input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes?

- *Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of relevant stakeholders at the outset of the planning and implementation process?*
- *Did the SEA indicate that it modified any aspect of its request based on stakeholder input?*
- *Does the input represent feedback from a diverse mix of stakeholders representing various perspectives and interests, including stakeholders from high-need communities?*

CONSULTATION QUESTION 2**PANEL RESPONSE***Tally of Peer Responses:**6 Yes, 1 No*

<i>Rationale</i>	<ul style="list-style-type: none"> SEA meaningfully engaged and solicited input on its request from other diverse communities, although outreach to EL community appears to have been limited.
<i>Strengths</i>	<ul style="list-style-type: none"> Consultation Action Plan developed to engage stakeholders and assigned specific staff to contact specific organizations and representatives. Except in the EL community, stakeholder groups were represented by multiple and varied organizations.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Outreach to EL community seemed limited, especially in comparison to other groups engaged.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> Ensure structures created for targeting diverse groups remain intact for ongoing feedback during implementation and enhanced communication with EL community.

Overview

Note to Peers: Staff will review Questions 1 and 3

2. Does the SEA’s overview sufficiently explain the SEA’s comprehensive approach to implementing the waivers and principles and describe the Sea’s strategy for ensuring that this approach is coherent?

OVERVIEW QUESTION 2 PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none"> • Florida provides concise and coherent overview of ESEA flexibility request.
<i>Strengths</i>	No text
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	No text

Principle 1: College- and Career-Ready Expectations for All Students

Note to Peers: Staff will review 1.A Adopt College-And Career-Ready Standards, Options A and B.

1.B Transition to college- and career-ready standards

1.B Is the SEA’s plan to transition to and implement college- and career-ready standards statewide in at least reading/language arts and mathematics no later than the 2013–2014 school year realistic, of high quality, and likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with such standards?

A high-quality plan will likely include activities related to the following questions or an explanation if one or more of the activities is not included. For the activities below that the SEA selects, will the results be used to inform the intended outcome?

- *Does the SEA intend to analyze the extent of alignment between the State’s current content standards and the college- and career-ready standards to determine similarities and differences between those two sets of standards? If so, will the results be used to inform the transition to college- and career-ready standards?*
- *Does the SEA intend to analyze the linguistic demands of the college- and career-ready standards to inform the development of ELP standards corresponding to the college- and career-ready standards and to ensure that English Learners will be able to access the college- and career-ready standards? If so, will the results be used to inform revision of the ELP standards and support English Learners in accessing the college- and career-ready standards?*
- *Does the SEA intend to analyze the learning and accommodation factors necessary to ensure that students with disabilities will have the opportunity to achieve to the college- and career-ready standards? If so, will the results be used to support students with disabilities in accessing the college- and career-ready standards on the same schedule as all students?*
- *Does the SEA intend to conduct outreach on and dissemination of standards? If so, does the SEA’s plan reach the appropriate stakeholders, including educators, administrators, families, and IHEs? Is it likely that the plan will result in all stakeholders increasing their awareness of the State’s college- and career-ready standards?*
- *Does the SEA intend to provide professional development and other supports to prepare teachers to teach all students, including English Learners, students with disabilities, and low-achieving students, to the new standards? If so, will the planned professional development and supports prepare teachers to teach to the new standards, use instructional materials aligned with those standards, and use data on multiple measures of student performance (e.g., data from formative, benchmark, and summative assessments) to inform instruction?*
- *Does the SEA intend to provide professional development and supports to prepare principals to provide strong, supportive instructional leadership based on the new standards? If so, will this plan prepare principals to do so?*

- *Does the SEA propose to develop and disseminate high-quality instructional materials aligned with the new standards? If so, are the instructional materials designed (or will they be designed) to support the teaching and learning of all students, including English Learners, students with disabilities, and low-achieving students?*
- *Does the SEA plan to expand access to college-level courses or their prerequisites, dual enrollment courses, or accelerated learning opportunities? If so, will this plan lead to more students having access to courses that prepare them for college and a career?*
- *Does the SEA intend to work with the State’s IHEs and other teacher and principal preparation programs, to better prepare*
 - *incoming teachers to teach all students, including English Learners, students with disabilities, and low-achieving students, to the new college- and career-ready standards; and*
 - *incoming principals to provide strong, supportive instructional leadership on teaching to the new standards?*

If so, will the implementation of the plan likely improve the preparation of incoming teachers and principals?
- *Does the SEA plan to evaluate its current assessments and increase the rigor of those assessments and their alignment with college- and career-ready standards, in order to better prepare students and teachers for the new assessments through one or more of the following strategies:*
 - *Raising the State’s academic achievement standards on its current assessments to ensure that the adjusted achievement standards reflect a level of postsecondary readiness, or are being increased over time to that level of rigor (e.g., the SEA might compare current achievement standards to a measure of postsecondary readiness by back-mapping from college entrance requirements or remediation rates, analyzing the relationship between proficient scores on the State assessments and the ACT or SAT scores accepted by most of the State’s 4-year public IHEs, or conducting NAEP mapping studies)?*
 - *Augmenting or revising current State assessments by adding questions, removing questions, or varying formats in order to better align those assessments with college- and career-ready standards?*
 - *Implementing another strategy to increase the rigor of current assessments, such as using the “advanced” performance level on State assessments instead of the “proficient” performance level as the goal for individual student performance?*

Is this activity likely to result in an increase in the rigor of the assessments and their alignment with college- and career-ready standards?
- *Does the SEA propose other activities in its transition plan? If so, is it likely that these activities will support the transition to and implementation of college- and career-ready standards?*

1.B PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none">• Florida presents a comprehensive, coherent plan to transition to Common Core State Standards (CCSS).

1.B PANEL RESPONSE*Tally of Peer Responses:**7 Yes, 0 No**Strengths*

- Analysis of existing standards compared to CCSS began in 2008; in 2010 the Fordham Institute favorably compared their ELA and mathematics state standards to the CCSS
- Clear sequence for implementing CCSS across grades and subjects
- Integration of other initiatives, like APR data and RTI, with implementation of CCSS
- FDOE is developing many tools to assist with transition, including formative and interim assessment in math and ELA, online platform for accessing resources, lesson study tool kits
- Benchmarking against national and international resources, including NSDC, NAEP, and PISA
- Working with consortia, including WIDA for EL assessments, National Center and State Collaborative for Alternate Assessments, and PARRC for development of assessments
- Working closely with IHEs to prepare teacher candidates on CCSS, also revising certification exams to include CCSS
- Conducting linguistic studies for CCSS for ELs to inform development of ELP standards
- Significant State investment in accelerated learning efforts include college placement exams to assess college readiness and course work for identified students; high school accountability system; college board partnership; student performance based funding bonuses to drive AP and IB enrollment and success; dual enrollment is supported and rewarded.
- Universal design considerations and support for content and academic vocabulary are included in specification for instructional materials submitted to support adoption of CCSS.

1.B PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none">• Ensure that instructional shifts demanded by CCSS are thoroughly understood by all stakeholders; gap analysis showing strong alignment could encourage complacency.

1.C Develop and Administer Annual, Statewide, Aligned, High-Quality Assessments that Measure Student Growth

- 1.C** Did the SEA develop, or does it have a plan to develop, annual, statewide, high-quality assessments, and corresponding academic achievement standards, that measure student growth and are aligned with the State’s college- and career-ready standards in reading/language arts and mathematics, in at least grades 3-8 and at least once in high school, that will be piloted no later than the 2013–2014 school year and planned for administration in all LEAs no later than the 2014–2015 school year, as demonstrated through one of the three options below? Does the plan include setting academic achievement standards?

Note to Peers: Staff will review Options A and C.

If the SEA selected Option B:

If the SEA is neither participating in a State consortium under the RTTA competition nor has developed and administered high-quality assessments, did the SEA provide a realistic, high-quality plan describing activities that are likely to lead to the development of such assessments, their piloting no later than the 2013–2014 school year, and their annual administration in all LEAs beginning no later than the 2014–2015 school year? Does the plan include setting academic achievement standards?

1.C, OPTION B PANEL RESPONSE	
<i>Tally of Peer Responses:</i> NA	
<i>Rationale</i>	No text
<i>Strengths</i>	No text
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	No text
<input checked="" type="checkbox"/> <i>Not applicable because the SEA selected 1.C, Option A or Option C</i>	No text

Principle 1 Overall Review

Is the SEA’s plan for transitioning to and implementing college-and career-ready standards, and developing and administering annual, statewide, aligned high-quality assessments that measure student growth, comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

PRINCIPLE 1 OVERALL REVIEW PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none"> Florida has a comprehensive, high quality plan to transition to CCSS in all areas for all students, which includes alignment of new assessments and higher standards for achievement.
<i>Strengths</i>	No text
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> Analyze rigor of current and proposed cut scores to ensure that “proficient” (level 3) actually represents college readiness. Concern is raised by the increase in percent scoring at Level 3 or above in 10th grade reading (p. 41). Develop interim measures of successful implementation for monitoring transition to CCSS.

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

2.A Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support

2.A.i Did the SEA propose a differentiated recognition, accountability, and support system, and a high-quality plan to implement this system no later than the 2012–2013 school year, that is likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students?

2.A.i PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none"> Florida’s proposal represents a coherent effort to unify state and federal systems around its successful and longstanding existing system for recognition, accountability, and support. Its high quality plan will meet the 2012-13 timeline for implementation.
<i>Strengths</i>	<ul style="list-style-type: none"> Proposed adjustments include end of course exams and additional college and career readiness measures. The focus on bottom quartile-performing students sharpens the focus on SWD, ELs, and low-income students. In addition, all primary language arts teachers must become ESOL endorsed. The state also includes specific subgroup AMOs.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> The learning gains approach (see p. 51) based on movement across performance levels provides less detailed and actionable information than growth models that measure individual student progress across the achievement spectrum.

2.A.i PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Consider potential improvements to the Learning Gains metric by using a growth model that furnishes more detailed actionable information to educators and the public. • Monitor transition to greater inclusion of EL and SWD. Verbal assurance was given on call with State, but initial concerns were related to: exclusion criteria from performance component (p. 9) of the TAC for Calculating FL School Grades (p. 33) Students who are in all but three exceptional student education classifications or have been in ESOL programs for less than two years are included only in the participation and learning gains components of the school grade; they are not included in the components for meeting high standards in reading, math, writing, and science. Florida's School Grading methodology excludes ELL that have been in programs for less than two years and several classifications of SWD from the performance components in reading, math, writing and science of the school's grade.

- a. Does the SEA’s accountability system provide differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools in those LEAs based on (1) student achievement in reading/language arts and mathematics, and other subjects at the State’s discretion, for all students and all subgroups of students identified in ESEA section 1111(b)(2)(C)(v)(II); (2) graduation rates for all students and all subgroups; and (3) school performance and progress over time, including the performance and progress of all subgroups?

2.A.i.a PANEL RESPONSE Tally of Peer Responses: <i>4 Yes, 3 No</i>	
Rationale	<ul style="list-style-type: none"> Florida’s proposed accountability system provides differentiated recognition, accountability, and support for all LEAs. Key weaknesses were identified around graduation rate and participation rate accountability.
Strengths	<ul style="list-style-type: none"> System includes subjects other than reading and math, specifically science and writing. Multiple incentives to improve performance of lowest-performing students Balanced set of measures for college and career readiness with an emphasis on and incentives for exposing students to college-level work Achievement results for students in alternative schools are attributed to schools from which they transferred if the alternative schools elect to not receive a school rating.

2.A.i.a PANEL RESPONSE Tally of Peer Responses: 4 Yes, 3 No	
Weaknesses, issues, lack of clarity	<ul style="list-style-type: none"> ● Graduation rate accountability is less than under current federal law. Under the proposed index system, a school can make substantial and continuous improvement for a number of years and not improve their graduation rate, as graduation rate only counts for 19% of the index and the other 81% can benefit and be improved by having lowest-performing students drop out (p. 85). ● It appears that performance of substantial numbers of SWD and ELs is excluded from A-F grading system. ● Lowers bar for participation rates for “B-F” schools (p. 51) ● Graduation rates and participation rates, including those of subgroups, are not reported in the AMO report card (p. 95-97). ● Alternative schools can opt out of A-F system. Unlike with achievement, graduation success of students is not attributed back to the home school. ● Ambiguity with including adjudicated students in accountability system
Technical Assistance Suggestions	<ul style="list-style-type: none"> ● Reconsider participation rate expectations across the A-F school grading system. ● Consider some of the following options as ways to improve graduation rate accountability: 1) increase weight to be more co-equals to the achievement scores; 2) dropouts could count as zeroes in the achievement scores; 3) link college readiness indicators to the adjusted ninth grade cohort; and 4) use a conjunctive A-F grading system where the graduation rate represents its own A-F grade, i.e. 65% graduation rate = D or 85% graduation rate = B.

- b. Do the SEA's differentiated recognition, accountability, and support system create incentives and provide support to close achievement gaps for all subgroups of students?

2.A.i.b PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 5 Yes, 2 No	
<i>Rationale</i>	<ul style="list-style-type: none"> Florida presents a differentiated recognition, accountability, and support system that is focused on closing achievement gaps.
<i>Strengths</i>	<ul style="list-style-type: none"> Focus on bottom 25% ensures focus on students in traditionally underserved subgroups. Focus on bottom 25% will include some students in subgroups too small to be considered separately. Includes both graduation rates for all students and students who entered high school below grade level in reading and mathematics (p. 52). Creates incentives to get more students into college-level courses through monetary awards which have led to increase in subgroup students in these courses. Plan builds on a differentiated, accountability and support system focused on closing gaps for subgroups with a positive track record.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Low performance of some subgroups can be masked in A-F grading system. It appears that performance of substantial numbers of SWD and ELs is excluded from A-F grading system.

2.A.i.b PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 5 Yes, 2 No	
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Consider using the English Language Proficient Assessment results to ensure inclusion of all ELs in the performance measure of the A-F grading system. • Consider clear reporting by subgroup of all relevant indicators including graduation and participation rate. • Consider more explicit connection between subgroup performance and AMOs and school grades.

c. Does the SEA’s differentiated recognition, accountability, and support system include interventions specifically focused on improving the performance of English Learners and students with disabilities?

2.A.i.c PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none"> • Plan describes both specific and general approaches to addressing the needs of ELs and SWD.
<i>Strengths</i>	<ul style="list-style-type: none"> • Cross references other initiatives, such as State Performance Plan (SPP) and integrates focus on broader goals to include all students, including ELs and SWD, and their teachers. • Requires all language arts teachers to obtain an ESLOL endorsement
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Ensure that all SWD and ELs are included in the performance data used to define interventions and that results are monitored over time.

- d. Did the SEA provide a plan that ensures that the system will be implemented in LEAs and schools no later than the 2012–2013 school year?

2.A.i.d PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none"> • The SEA provided a plan that ensures that the system will be implemented in LEAs and schools no later than the 2012–2013. The plan builds on current practice with a reasonable timeline for adjustments.
<i>Strengths</i>	No text
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	No text

Note to Peers: Staff will review 2.A.ii Option A.

ONLY FOR SEAs SELECTING OPTION B: If the SEA elects to include student achievement on assessments other than reading/language arts and mathematics in its differentiated recognition, accountability, and support system by selecting Option B, review and respond to peer review questions in section 2.A.ii. If the SEA does not include other assessments, go to section 2.A.iii.

- 2.A.ii** Did the SEA include student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools?
- a. Did the SEA provide the percentage of students in the “all students” group that performed at the proficient level on the State’s most recent administration of each additional assessment for all grades assessed?
 - b. Does the SEA’s weighting of the included assessments result in holding schools accountable for ensuring all students achieve the State’s college- and career-ready standards?

<p>2.A.ii (INCLUDING QUESTIONS a AND b) PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No</p>	
<i>Rationale</i>	<ul style="list-style-type: none"> • Florida’s plan includes reading, math, writing, and science and balances these in a reasonable manner. Percent proficient in the “all students” group for most recent administration of these assessments is provided. The SEA’s weighting of the included assessments provides a reasonable approach to holding schools accountable for ensuring all students achieve the State’s college- and career-ready standards.
<i>Strengths</i>	No text
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	No text
<input type="checkbox"/> <i>Not applicable because the SEA selected 2.A, Option A</i>	No text

2.B Set Ambitious but Achievable Annual Measurable Objectives

2.B *Note to Peers: Staff will review Options A and B.*

Did the SEA describe the method it will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics, for the State and all LEAs, schools, and subgroups, that provide meaningful goals and are used to guide support and improvement efforts?

If the SEA selected Option C:

Did the SEA describe another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups?

- i. Did the SEA provide the new AMOs and the method used to set these AMOs?
 - ii. Did the SEA provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs?
 - iii. If the SEA set AMOs that differ by LEA, school, or subgroup, do the AMOs require LEAs, schools, and subgroups that are further behind to make greater rates of annual progress?
 - iv. Did the SEA attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the “all students” group and all subgroups? (Attachment 8)
- *Are these AMOs similarly ambitious to the AMOs that would result from using Option A or B above?*
 - *Are these AMOs ambitious but achievable given the State’s existing proficiency rates and any other relevant circumstances in the State?*
 - *Will these AMOs result in a significant number of children being on track to be college- and career-ready?*

2.B AND 2.B, OPTION C (INCLUDING QUESTIONS i–iv) PANEL RESPONSE Tally of Peer Responses: <i>4 Yes, 3 No</i>	
Rationale	<ul style="list-style-type: none"> Florida’s AMO approach examines a rich array of cross-indicator, subgroup by subject, bottom 25% and statewide targets; however, transparency of public reporting of AMO components, graduation rates, and participation rates by subgroup should be improved.
Strengths	<ul style="list-style-type: none"> Florida’s AMO approach includes annual determinations for each subgroup at the school and district level. It also includes an evaluation of trends over time. (p.95). AMOs are set separately for each district, school, and subgroup to ensure focus on meaningful, continuous improvement. Schools that do not meet AMO for lowest-performing 25% of students are lowered by one letter grade. The proposal includes statewide targets on NAEP, TIMSS, PIRLS, and PISA.
Weaknesses, issues, lack of clarity	<ul style="list-style-type: none"> Florida’s AMO approach appears to conflate the idea of summary judgments based on a multi-measure framework and targets for specific elements of that framework. It is difficult to understand how a letter grade (a summative judgment across indicators) represents a meaningful AMO, given that it does not communicate a specific student or school outcome related to an observable measure, e.g. a specific performance level, growth rate of student, or actual magnitude of the gap. AMOs other than school grade do not relate to accountability determinations. Graduation rates and participation rates, including those of subgroups, are not reported in the AMO report card (p. 95-97).

**2.B AND 2.B, OPTION C
(INCLUDING QUESTIONS i–iv)**

PANEL RESPONSE

Tally of Peer Responses:

4 Yes, 3 No

Technical Assistance Suggestions

- Recommend reconsideration of how AMOs, targets, and goals are defined to promote public understanding. Is it meaningful to use of the term targets or AMOs to describe school grades as well as subgroup and bottom 25% targets?
- Consider making the underlying rubric and component scores available to the public in a user-friendly format to build understanding of what a letter grade really means.
- For improved transparency and attention to disparities, consider reporting the percent of students scoring at level 4 and level 5 on School–Level and LEA-Level Reports (see p. 95)

Not applicable because the SEA selected 2.B, Option A or Option B

2.C Reward Schools

Note to Peers: Staff will review 2.C.i and 2.C.ii.

2.C.iii Did the SEA describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools?

- *Has the SEA provided a reasonable explanation of why its proposed recognition and, where applicable, rewards are likely to be considered meaningful by schools? For example, has the SEA consulted with LEAs and schools in designing its recognition and, where applicable, rewards?*

2.C.iii PANEL RESPONSE	
Tally of Peer Responses: 7 Yes, 0 No	
Rationale	<ul style="list-style-type: none"> • Florida described a well-established public recognition and rewards system.
Strengths	<ul style="list-style-type: none"> • Reward schools will be identified using a widely recognized and understood school grading system already in place. • Legislature appropriated \$120 million in rewards to “A” schools and schools that improved at least one performance level.
Weaknesses, issues, lack of clarity	<ul style="list-style-type: none"> • For highest-performing and high-progress schools, the proposal does not take into account meeting AMOs and closing subgroup achievement gaps in the school. • The proposal shows that nearly half of Florida’s Title 1 schools (901 of 1,853) are classified as reward schools. Raises concern that grading may be too lenient (p. 117).
Technical Assistance Suggestions	<ul style="list-style-type: none"> • Examine the rigor of the school grading system and ensure it is sending signals to schools that provide incentives for adequate rigor and focus on all students.

2.D Priority Schools

Note to Peers: Staff will review 2.D.i and 2.D.ii.

- 2.D.iii** Are the interventions that the SEA described aligned with the turnaround principles and are they likely to result in dramatic, systemic change in priority schools?
- a. Do the SEA’s interventions include all of the following?
- (i) providing strong leadership by: (1) reviewing the performance of the current principal; (2) either replacing the principal if such a change is necessary to ensure strong and effective leadership, or demonstrating to the SEA that the current principal has a track record in improving achievement and has the ability to lead the turnaround effort; and (3) providing the principal with operational flexibility in the areas of scheduling, staff, curriculum, and budget;
 - (ii) ensuring that teachers are effective and able to improve instruction by: (1) reviewing the quality of all staff and retaining only those who are determined to be effective and have the ability to be successful in the turnaround effort; (2) preventing ineffective teachers from transferring to these schools; and (3) providing job-embedded, ongoing professional development informed by the teacher evaluation and support systems and tied to teacher and student needs;
 - (iii) redesigning the school day, week, or year to include additional time for student learning and teacher collaboration;
 - (iv) strengthening the school’s instructional program based on student needs and ensuring that the instructional program is research-based, rigorous, and aligned with State academic content standards;
 - (v) using data to inform instruction and for continuous improvement, including by providing time for collaboration on the use of data;
 - (vi) establishing a school environment that improves school safety and discipline and addressing other non-academic factors that impact student achievement, such as students’ social, emotional, and health needs; and
 - (vii) providing ongoing mechanisms for family and community engagement?

2.D.iii.a (INCLUDING QUESTIONS (i)-(vii)) PANEL RESPONSE <i>Tally of Peer Responses:</i> <i>7 Yes, 0 No</i>	
<i>Rationale</i>	<ul style="list-style-type: none"> Florida’s proposal describes interventions that are aligned with the turnaround principles specified in the criteria.
<i>Strengths</i>	<ul style="list-style-type: none"> Regional teams, with five regional executive directors, provide instructional monitoring using a District and School Compliance Checklist as well as a Strategies and Support Document that specifies interventions aligned with the turnaround principles (see attachment 12, p. 236).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Florida’s strategy is underdeveloped in addressing non-academic factors that impact student achievement, e.g. chronic absenteeism.
<i>Technical Assistance Suggestions</i>	No text

- b. Has the SEA identified practices to be implemented that meet the turnaround principles and are likely to —
- (i) increase the quality of instruction in priority schools;
 - (ii) improve the effectiveness of the leadership and the teaching in these schools; and
 - (iii) improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students?

<p>2.D.iii.b (INCLUDING QUESTIONS (i)-(iii)) PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No</p>	
<p><i>Rationale</i></p>	<ul style="list-style-type: none"> • A reasonable strategy with required components was presented. See p.103-108.
<p><i>Strengths</i></p>	<ul style="list-style-type: none"> • LEAs with Priority Schools are required to conduct a diagnostic needs assessment and submit a plan for review and approval by the State Board of Education (p.99-100). • A comprehensive approach is presented, including specific expectations for activities and criteria related to school leadership, operating flexibility, effective teachers, additional learning time, instructional programs, data use, school culture, Problem-Solving and Response-to-Intervention, family and community engagement, and a specified oversight and monitoring process (pp. 99-107). • A strong instructional improvement system that links fine-grained diagnosis of learning challenges to effective interventions to address that specific challenge to training teachers and leaders to implement the intervention • Investment in training and capacity building of leaders for turnaround including a specialized summer institute • Professional development is tied specifically to improving effectiveness of instruction for subgroups of students. • Florida’s continuous improvement model requires continuous use of student data in differentiated instruction, which includes push-in, pull-out and individualized (p. 104).

2.D.iii.b (INCLUDING QUESTIONS (i)-(iii)) PANEL RESPONSE <i>Tally of Peer Responses:</i> <i>7 Yes, 0 No</i>	
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Plan lacks strong focus on early warning indicators and a student support system that keeps students on track to graduation, from middle school through high school. Track record with improvement for high schools per Table 2 (p. 134) does not seem strong.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> Consider how to establish an early warning system which provide stronger supports.

c. Has the SEA indicated that it will ensure that each of its priority schools implements the selected intervention for at least three years?

2.D.iii.c PANEL RESPONSE <i>Tally of Peer Responses:</i> <i>0 Yes, 7 No</i>	
<i>Rationale</i>	<ul style="list-style-type: none"> The proposal allows priority schools to implement an option for a two-year period (p. 107-108).
<i>Strengths</i>	No text
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	No text

2.D.iv Is the SEA’s proposed timeline for ensuring that LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year reasonable and likely to result in implementation of the interventions in these schools?

- *Does the SEA’s proposed timeline distribute priority schools’ implementation of meaningful interventions aligned with the turnaround principles in a balanced way, such that there is not a concentration of these schools in the later years of the timeline?*

2.D.iv PANEL RESPONSE*Tally of Peer Responses:*

7 Yes, 0 No

<i>Rationale</i>	<ul style="list-style-type: none"> Florida’s proposed timeline shows that LEAs that have one or more priority schools will implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year and are reasonable and likely to result in implementation of the interventions in these schools. No concentration of schools in later years is evident.
<i>Strengths</i>	No text
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	No text

2.D.v Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement exits priority status?

- a. Do the SEA’s criteria ensure that schools that exit priority status have made significant progress in improving student achievement?
- *Is the level of progress required by the criteria to exit priority status likely to result in sustained improvement in these schools?*

2.D.v and 2.D.v.a PANEL RESPONSE*Tally of Peer Responses:*

4 Yes, 3 No

<i>Rationale</i>	<ul style="list-style-type: none"> Florida provided criteria that ensures schools have made significant progress in improving student achievement to exit priority status. Although having a graduation rate below 60% is the primary way schools enter priority status, there does not appear to be subsequent exit criteria based on improving graduation rates.
<i>Strengths</i>	<ul style="list-style-type: none"> Florida provides criteria for when a school is making significant progress to exit priority status based on both a school grade of C or higher and improve achievement in reading and math to meet criteria established by Florida’s State Board of Education.

2.D.v and 2.D.v.a PANEL RESPONSE*Tally of Peer Responses:**4 Yes, 3 No*

<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Does not indicate whether a high school has to substantially improve its graduation rates to exit priority status
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> Include graduation rates in exit criteria for priority schools. Provide criteria for determining state board approval of exit criteria in reading and math achievement.

2.E Focus Schools

2.E.i Did the SEA describe its methodology for identifying a number of low-performing schools equal to at least 10 percent of the State’s Title I schools as focus schools?

2.E.i PANEL RESPONSE*Tally of Peer Responses:**7 Yes, 0 No*

<i>Rationale</i>	<ul style="list-style-type: none"> Florida described its methodology for identifying a number of low-performing schools equal to at least 10 percent of the State’s Title I schools as focus schools.
<i>Strengths</i>	No text
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	No text

2.E.ii Did the SEA include a list of its focus schools?

a. Did the SEA identify a number of focus schools equal to at least 10 percent of the State’s Title I schools?

- b. In identifying focus schools, was the SEA’s methodology based on the achievement and lack of progress over a number of years of one or more subgroups of students identified under ESEA section 1111(b)(2)(C)(v)(II) in terms of proficiency on the statewide assessments that are part of the SEA’s differentiated recognition, accountability, and support system or, at the high school level, graduation rates for one or more subgroups?
- c. Did the SEA’s methodology result in the identification of focus schools that have —
- (i) the largest within-school gaps between the highest-achieving subgroup or subgroups and the lowest-achieving subgroup or subgroups or, at the high school level, the largest within-school gaps in the graduation rate; or
 - (ii) a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate?

2.E.ii (INCLUDING QUESTIONS a-c) PANEL RESPONSE <i>Tally of Peer Responses:</i> <i>0 Yes, 7 No</i>	
<i>Rationale</i>	<ul style="list-style-type: none"> • Florida does not meet requirements.
<i>Strengths</i>	No text
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Florida uses letter grading system to identify focus schools instead of using within-school gaps in achievement or graduation rates. • Use of multiple years of data was not indicated; relies on annual school grades.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Consider including both subgroup AMOs together and letter grades to identify focus schools. • Consider whether the percentage point gap between a school’s subgroup performance and statewide performance is adequately rigorous. • As the state updates its growth model, consider examining gaps in student growth rates as an approach to identifying Focus Schools.

2.E.iii Did the SEA describe the process and timeline it will use to ensure that each LEA identifies the needs of its focus schools and their students and provide examples of and justifications for the interventions the SEA will require its focus schools to implement to improve the performance of students who are furthest behind?

- *Has the SEA demonstrated that the interventions it has identified are effective at increasing student achievement in schools with similar characteristics, needs, and challenges as the schools the SEA has identified as focus schools?*
- *Has the SEA identified interventions that are appropriate for different levels of schools (elementary, middle, high) and that address different types of school needs (e.g., all-students, targeted at the lowest-achieving students)?*

2.E.iii PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 2 Yes, 5 No	
<i>Rationale</i>	<ul style="list-style-type: none"> • Florida’s identification of focus schools was not based on achievement gaps. The description of interventions does not seem focused on closing those gaps.
<i>Strengths</i>	<ul style="list-style-type: none"> • Regional delivery system supports, guides, and monitors plans and implementation while building LEA capacity. • Comprehensive diagnostic assessment is required for focus schools. • District are held accountable and supported for support and interventions in focus schools; district capacity is also supported.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • While there is a strong focus on planning, identification of appropriate interventions, and compliance monitoring, there is limited evidence of direct technical assistance and implementation support. • Generic interventions make little mention of specific subgroup, e.g. ELs and SWD (p. 113).

2.E.iii PANEL RESPONSE

Tally of Peer Responses:

2 Yes, 5 No

Technical Assistance Suggestions

- Ensure that focus on CCSS is infused in diagnosis and intervening in focus schools.
- As you reconsider process for identification of focus school, tailor plans to meet the needs of identified gap groups.

2.E.iv Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status?

a. Do the SEA’s criteria ensure that schools that exit focus status have made significant progress in improving student achievement and narrowing achievement gaps?

➤ *Is the level of progress required by the criteria to exit focus status likely to result in sustained improvement in these schools?*

2.E.iv and 2.E.iv.a PANEL RESPONSE <i>Tally of Peer Responses:</i> 0 Yes, 7 No	
<i>Rationale</i>	<ul style="list-style-type: none"> • While Florida’s accountability system promotes coherence, the approach to closing achievement gaps is not adequately addressed in exit criteria for focus schools.
<i>Strengths</i>	<ul style="list-style-type: none"> • If school does not improve within two years, more substantial reforms are enacted. • Connection between focus school identification and letter grade system improves coherence of accountability system.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • It is possible for schools to move from “D” to “C”, and exit focus status, without significantly addressing achievement gaps. For example, a school only needs to gain 40 points on an 800-point scale to move from “D” to “C”. There are many ways to move 40 points without addressing achievement gaps in a significant way.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Include explicit focus on subgroup performance in “D” designation. • State Board should consider adding State Board-established criteria for exiting focus school status by focusing on closing achievement and graduation gaps, in a manner parallel to proposal for priority schools.

2.F Provide Incentives and Support for other Title I Schools

2.F Does the SEA’s differentiated recognition, accountability, and support system provide incentives and supports for other Title I schools that, based on the SEA’s new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps? Are those incentives and supports likely to improve student achievement, close achievement gaps, and increase the quality of instruction for students?

2.F PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none"> Florida’s approved differentiated accountability system coupled with its school grading system provides incentives and support for other Title I schools.
<i>Strengths</i>	<ul style="list-style-type: none"> Provides an emphasis on building LEA capacity to address the needs of all schools.
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	No text

2.G Build SEA, LEA, and School Capacity to Improve Student Learning

2.G Is the SEA’s process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, likely to succeed in improving such capacity?

- i. Is the SEA’s process for ensuring timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools likely to result in successful implementation of these interventions and in progress on leading indicators and student outcomes in these schools?

➤ *Did the SEA describe a process for the rigorous review and approval of any external providers used by the SEA and its LEAs to support the implementation of interventions in priority and focus schools that is likely to result in the identification of high-quality partners with experience and expertise applicable to the needs of the school, including specific subgroup needs?*

2.G.i PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none"> • Capacity building is focused on a systemic approach including standards implementation, educator quality, and school improvement.
<i>Strengths</i>	<ul style="list-style-type: none"> • Includes developing a leadership pipeline for turnaround principals and assistant principals. • Includes a focus building rural capacity for school turnaround. • Describes a differentiated accountability regional system of support for building LEA capacity led by an experienced regional executive director. Describes the role of regional specialists and coordinators, who will provide support to school-based instructional coaches and teachers. The regional support includes diagnostic instructional reviews (p.125). • Specific steps taken to ensure teachers have common planning and collaborative work time. • State has defined criteria that LEAs must use as they recruit external partnerships.

2.G.i PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Description of capacity building is not explicitly focused on integrating needs of subgroups of students with overall capacity building strategies. • Limited description of direct technical assistance in priority schools to support ongoing implementation.
<i>Technical Assistance Suggestions</i>	No text

- ii. Is the SEA’s process for holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools, likely to improve LEA capacity to support school improvement?

2.G.ii PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none"> • Accountability plan holds high standards and provides a mix of oversight mechanisms – local and state – to ensure progress towards goals.
<i>Strengths</i>	<ul style="list-style-type: none"> • District improvement assisting plan provides specific framework for State to work with districts to hold them accountable for supporting improvements (p.113).
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	No text

- iii. Is the SEA’s process for ensuring sufficient support for implementation in priority schools, focus schools, and other Title I schools identified under the SEA’s differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources) likely to result in successful implementation of such interventions and improved student achievement?

2.G.iii PANEL RESPONSE	
Tally of Peer Responses: <i>7 Yes, 0 No</i>	
Rationale	<ul style="list-style-type: none"> Deliberate strategy for leveraging multiple sources of funding is described.
Strengths	No text
Weaknesses, issues, lack of clarity	No text
Technical Assistance Suggestions	No text

Principle 2 Overall Review

Is the SEA’s plan for developing and implementing a system of differentiated recognition, accountability, and support likely to improve student achievement, close achievement gaps, and improve the quality of instruction for students? Do the components of the SEA’s plan fit together to create a coherent and comprehensive system that supports continuous improvement and is tailored to the needs of the State, its LEAs, its schools, and its students? If not, what aspects are not addressed or need to be improved upon?

PRINCIPLE 2 OVERALL REVIEW PANEL RESPONSE <i>Tally of Peer Responses: 3 Yes, 4 No</i>	
<i>Rationale</i>	<ul style="list-style-type: none"> Florida proposes a promising system based on its long-standing school-grading system. However, substantial weaknesses were identified that could undermine the rigor of the system related to graduation expectations, achievement gaps and the identification of Focus Schools.
<i>Strengths</i>	<ul style="list-style-type: none"> A strong commitment to intervention in the lowest-performing schools consistent with turnaround principles was evident. A strong differentiated regional system of support and intervention was described.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Graduation rate accountability is not strong enough. The criteria for school grades (p.51) may not be adequately rigorous to reach a “C” grade. For example, the interval for a ‘D’ school is only 40 points out of 800 points. The learning gains approach for measuring growth within performance levels and across the entire achievement spectrum is under development.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> Reconsider the school grading criteria to ensure adequate rigor and focus on subgroups. As the formula is changed to ensure all students are included in grading system, as articulated on the State call, monitor implementation and outcomes.

Principle 3: Supporting Effective Instruction and Leadership

3.A Develop and Adopt Guidelines for Local Teacher and Principal Evaluation and Support Systems

3.A.i Has the SEA developed and adopted guidelines consistent with Principle 3 through one of the three options below?

If the SEA selected Option A:

If the SEA has not already developed any guidelines consistent with Principle 3:

- i. Is the SEA’s plan for developing and adopting guidelines for local teacher and principal evaluation and support systems likely to result in successful adoption of those guidelines by the end of the 2011–2012 school year?

3.A.i, OPTION A.i	
PANEL RESPONSE	
<i>Tally of Peer Responses:</i>	
<i>NA</i>	
<i>Rationale</i>	No text
<i>Strengths</i>	No text
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	No text
<input checked="" type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option B or Option C</i>	No text

- ii. Does the SEA’s plan include sufficient involvement of teachers and principals in the development of these guidelines?

3.A.i, OPTION A.ii PANEL RESPONSE	
<i>Tally of Peer Responses:</i> NA	
<i>Rationale</i>	No text
<i>Strengths</i>	No text
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	No text
<input checked="" type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option B or Option C</i>	No text

Note to Peers: Staff will review iii.

If the SEA selected Option B:

If the SEA has already developed and adopted one or more, but not all, guidelines consistent with Principle 3:

Note to Peers: Staff will review i and iii.

- ii. Are the guidelines the SEA has adopted likely to lead to the development of evaluation and support systems that increase the quality of instruction for students and improve student achievement? (See question 3.A.ii to review the adopted guidelines for consistency with Principle 3.)

3.A.i, OPTION B.ii PANEL RESPONSE	
<i>Tally of Peer Responses:</i> NA	
<i>Rationale</i>	No text
<i>Strengths</i>	No text
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	No text
<input checked="" type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option A or Option C</i>	

- iv. Is the SEA’s plan for developing and adopting the remaining guidelines for teacher and principal evaluation and support systems likely to result in successful adoption of these guidelines by the end of the 2011–2012 school year?

3.A.i OPTION B.iv PANEL RESPONSE	
<i>Tally of Peer Responses:</i> NA	
<i>Rationale</i>	No text
<i>Strengths</i>	No text
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	No text
<input checked="" type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option A or Option C</i>	

- v. Did the SEA have sufficient involvement of teachers and principals in the development of these guidelines? Does the SEA’s plan include sufficient involvement of teachers and principals in the development of the remaining guidelines?

3.A.i OPTION B.v PANEL RESPONSE	
<i>Tally of Peer Responses:</i> NA	
<i>Rationale</i>	No text
<i>Strengths</i>	No text
<i>Weaknesses, issues, lack of clarity</i>	No text
<i>Technical Assistance Suggestions</i>	No text
<input checked="" type="checkbox"/> <i>Not Applicable because the SEA selected 3.A, Option A or Option C</i>	No text

If the SEA selected Option C:

If the SEA has developed and adopted all guidelines consistent with Principle 3:

- i. Are the guidelines the SEA has adopted likely to lead to the development of evaluation and support systems that increase the quality of instruction for students and improve student achievement? (See question 3.A.ii to review the adopted guidelines for consistency with Principle 3.)

3.A.i, OPTION C.i PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none"> • Florida has adopted a strong state law and detailed guidelines for guiding design, implementation and monitoring of multiple measure evaluation systems for teachers and principals. In addition to presenting clear expectations for effective instruction and leadership, evaluation systems must weight student growth as a significant factor use results to inform professional development and personnel decisions, including compensation and dismissal.

3.A.i, OPTION C.i PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Strengths</i>	<ul style="list-style-type: none"> • The state has provided a great deal of technical assistance, resources and opportunities for districts to engage in joint solution work (i.e. tech platform for item banking, Marzano model and resources, Growth Model Implementation Committee, Florida's value added model). • The state's Educator Accomplished Practices (attachment 10c) provides a comprehensive, detailed vision for instructional excellence and facilitates a common language for evaluation expectations among LEA's, even where different models are used. • Requirements under law and regulations place a clear focus on research-based practices, frequent observation and feedback, targeted professional development and provide a basis for consistent and deliberate use in human capital decisions.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Principal evaluation model is not submitted. • Field testing was not done on the approved models, including professional practice and student growth component. • It is not evident how LEAs will record and calculate educator effectiveness scores or how scores will be reported and monitored by the state.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The state should make every attempt possible to monitor consistency of results across schools and districts; set clear expectations for results, hold LEAs accountable (i.e. must use state model if they fall out of line with performance expectations), and to be attentive to unintended consequences of use of stakes in advance of educator readiness. • The state should clarify plans to evaluate, modify and approve changes to the state and other LEA models over time to ensure valid and reliable measures and comparable results across the state.

<p>3.A.i, OPTION C.i PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No</p>	
<p><input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option A or Option B</i></p>	

Note to Peers: Staff will review ii.

iii. Did the SEA have sufficient involvement of teachers and principals in the development of these guidelines?

3.A.i OPTION C.iii PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none"> Input and communication with educators and stakeholder groups has been strong since the work began to revise the Florida Educator Accomplished Practices in January 2010.
<i>Strengths</i>	<ul style="list-style-type: none"> Evidence presented of input sessions and stakeholder engagement in development of rules and regulations (p.146-147) The state has formed many work groups and committees of practitioners and education leaders to guide design and implementation of the new evaluation systems, i.e. Teacher Advisory Committee (p.147), Student Growth Committee (p.150). Strong technical assistance has been provided to LEAS around developing systems. State has developed an impressive web site with archived tools, meeting notes, resources, forms, etc.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Because RTTT participating LEAs have been most engaged in development of design and plans for implementation, non-RTTT LEAs have less time and incentive to develop high quality plans for their evaluation systems.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> Consider carefully how to best develop buy in, provide sufficient resources and build expertise for non-RTTT LEAs to develop and implement high quality plans. Consider how to meaningfully employ additional strategies to collect input to inform refinement of the state model (i.e. Annual surveys and focus groups with educators, external review of systems and analysis of data, regular regional meetings to discuss and address implementation challenges like principal time and inter-rater reliability)

<p>3.A.i OPTION C.iii PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No</p>	
<p><input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option A or Option B</i></p>	

ONLY FOR SEAs SELECTING OPTION B OR C: If the SEA has adopted guidelines for local teacher and principal evaluation and support systems by selecting Option B or C in section 3.A, review and respond to peer review question 3.A.ii below.

3.A.ii For any teacher and principal evaluation and support systems for which the SEA has developed and adopted guidelines, consistent with Principle 3, are they systems that:

a. Will be used for continual improvement of instruction?

➤ *Are the SEA’s guidelines likely to result in support for teachers that will enable them to improve their instructional practice?*

3.A.ii.a PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none"> State statute and guidelines clearly require that results be used to provide feedback to educators and to inform development plans at the LEA level.
<i>Strengths</i>	<ul style="list-style-type: none"> State law requires LEAs to develop and submit professional development plans to target educators’ specific needs. Additional support is required for new teachers under system guidelines, including coaching first and second-year teachers by effective teachers.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Without a mechanism for data collection at the state level, may be hard to monitor quality of implementation and professional development plans from district to district. Beyond statute, principal evaluation plans and requirements are not clearly presented.
<i>Technical Assistance Suggestions</i>	No text
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i>	

b. Meaningfully differentiate performance using at least three performance levels?

- *Does the SEA incorporate student growth into its performance-level definitions with sufficient weighting to ensure that performance levels will differentiate among teachers and principals who have made significantly different contributions to student growth or closing achievement gaps?*

3.A.ii.b PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 2 Yes, 5 No	
<i>Rationale</i>	<ul style="list-style-type: none"> • Statute requires that evaluation systems differentiate educator performance according to four levels of effectiveness, but there are significant concerns about the measures related to student growth.
<i>Strengths</i>	<ul style="list-style-type: none"> • State has committed to building a value-added model to be used in educator evaluations.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Ambiguity in guidelines around how weighting of components for educators in untested grades and subjects may present challenges for LEAs and result in inconsistent standards for growth measurement across districts. • Requirements that LEAs develop assessments for all courses may place undue burden on districts and unintended consequences related to quality and amount of student testing practices. In addition, the widespread use of standardized tests lacks a research base that it will result in improvement of student outcomes. • For teachers in tested grades and subjects, value-added scores are the exclusive measure of teacher’s contribution to student growth. Such a high-stakes focus on a single assessment does not represent a best practice.

<p>3.A.ii.b PANEL RESPONSE <i>Tally of Peer Responses:</i> 2 Yes, 5 No</p>	
<p><i>Technical Assistance Suggestions</i></p>	<ul style="list-style-type: none"> • Consider other methods beyond standardized test for assessing growth and achievement of students (i.e. student learning objectives, peer reviewed performance assessments, etc.). • Present clear guidelines and examples for both component and overall score calculations for tested and untested educators. • Consider incorporation of English Language Proficiency Assessment in determining teacher contributions to student growth.
<p><input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i></p>	

- c. Use multiple valid measures in determining performance levels, including as a significant factor data on student growth for all students (including English Learners and students with disabilities), and other measures of professional practice (which may be gathered through multiple formats and sources, such as observations based on rigorous teacher performance standards, teacher portfolios, and student and parent surveys)?
 - (i) Does the SEA have a process for ensuring that all measures that are included in determining performance levels are valid measures, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA?

3.A.ii.c and 3.A.ii.c(i) PANEL RESPONSE <i>Tally of Peer Responses:</i> 0 Yes, 7 No	
<i>Rationale</i>	<ul style="list-style-type: none"> • While guidelines do require multiple measures of teacher and student performance, there is not a clearly articulated plan for ongoing review and analysis of measures, methods and fidelity of implementation not relative to student academic improvement.
<i>Strengths</i>	<ul style="list-style-type: none"> • Requires research-based evidence for components included in LEA plans.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Insufficient quality control assurances related to non-tested grades and subjects. • Not evident that guidance has been provided around how many observations must be performed each year for an ‘annual performance evaluation’.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Local models will need careful oversight and quality monitoring/support/intervention; i.e. monitor range of distribution among schools and districts • Develop and share with LEAs the state's plan for on-going analysis of components.
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i>	

(ii) For grades and subjects in which assessments are required under ESEA section 1111(b)(3), does the SEA define a statewide approach for measuring student growth on these assessments?

3.A.ii.c(ii) PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 6 Yes, 1 No	
<i>Rationale</i>	<ul style="list-style-type: none"> Requirements are clear for use of state assessments in tested areas; value added model has been approved but details for use and reporting are not presented
<i>Strengths</i>	<ul style="list-style-type: none"> Adopting a state value added model will facilitate consistent use of scores in evaluation for tested educators
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> No evidence presented about how student results are attributed to individual teachers, how and when value added scores be calculated and reported
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> Determine and train teachers and leaders on specific methods for linking students and teachers, as well as regarding value added models for use in evaluation systems generally.
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i>	

(iii) For grades and subjects in which assessments are not required under ESEA section 1111(b)(3), does the SEA either specify the measures of student growth that LEAs must use or select from or plan to provide guidance to LEAs on what measures of student growth are appropriate, and establish a system for ensuring that LEAs will use valid measures?

3.A.ii.c(iii) PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 0 Yes, 7 No	
<i>Rationale</i>	<ul style="list-style-type: none"> While state is working to assist LEAs with development of alternate growth measures, requirements for weighting, acceptable measures and monitoring is not fully articulated

3.A.ii.c(iii) PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 0 Yes, 7 No	
<i>Strengths</i>	<ul style="list-style-type: none"> • State has committed to developing a state-wide item bank for Non Tested Grades and Subjects (NTGS) items. • State has appointed a committee charged with advising on plans for NTGS.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Plans lack detail about phasing in of alternative growth measures (Appendix p. 218). • No evidence presented about how item bank will work (i.e. security and quality assurances, bias and fairness reviews, high quality and defensible test development, ability for all LEAs able to utilize, how refreshed over time). • Emphasis on tests as the measure for NTGS rather than expanding the opportunities for using a broader body of evidence may be a premature choice given the early stage of development of these concepts.
<i>Technical Assistance Suggestions</i>	No text
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i>	

d. Evaluate teachers and principals on a regular basis?

3.A.ii.d PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none"> • State statute and guidelines require annual evaluation of all instructional staff
<i>Strengths</i>	<ul style="list-style-type: none"> • All teachers observed at least once a year, new teachers observed at least twice a year

3.A.ii.d PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Not evident what requirements exist around number of observations per ‘evaluation’ • Lack of detailed information presented about plans and requirements for principal evaluation
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Consider setting minimum requirements for the number of observations per evaluation cycle for teachers and principals
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i>	

- e. Provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development?
- *Will the SEA’s guidelines ensure that evaluations occur with a frequency sufficient to ensure that feedback is provided in a timely manner to inform effective practice?*
 - *Are the SEA’s guidelines likely to result in differentiated professional development that meets the needs of teachers?*

3.A.ii.e PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none"> • Regular feedback on practice and differentiated development plans are required by statute
<i>Strengths</i>	<ul style="list-style-type: none"> • More support is required for new teachers
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • It may be a challenge to ensure quality control of development plans and support across districts.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Consider both supports and audits for assessing quality of district PD plans. • Consider requiring more support for underperforming teachers as well as new teachers.

3.A.ii.e PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i>	

f. Will be used to inform personnel decisions?

3.A.ii.f PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	<ul style="list-style-type: none"> • The use of evaluation results in human capital decisions is a clear part of RTTT MOU and statute.
<i>Strengths</i>	<ul style="list-style-type: none"> • Requirements include ties to tenure, compensation, retention, and dismissal.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Not clearly articulated what differences may exist for non-RTTT LEAs in terms of requirements around use of personnel decisions based on evaluation results.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Consider to the extent possible how to ensure consistent use of results in personnel decisions across RTTT and non-RTTT districts.
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i>	

3. B Ensure LEAs Implement Teacher and Principal Evaluation and Support Systems

3.B Is the SEA's process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, evaluation and support systems consistent with the SEA's adopted guidelines likely to lead to high-quality local teacher and principal evaluation and support systems?

- *Does the SEA have a process for reviewing and approving an LEA's teacher and principal evaluation and support systems to ensure that they are consistent with the SEA's guidelines and will result in the successful implementation of such systems?*
- *Does the SEA have a process for ensuring that an LEA develops, adopts, pilots, and implements its teacher and principal evaluation and support systems with the involvement of teachers and principals?*
- *Did the SEA describe the process it will use to ensure that all measures used in an LEA's evaluation and support systems are valid, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA?*
- *Is the SEA's plan likely to be successful in ensuring that LEAs meet the timeline requirements by either (1) piloting evaluation and support systems no later than the 2013–2014 school year and implementing evaluation and support systems consistent with the requirements described above no later than the 2014–2015 school year; or (2) implementing these systems no later than the 2013–2014 school year?*
- *Do timelines reflect a clear understanding of what steps will be necessary and reflect a logical sequencing and spacing of the key steps necessary to implement evaluation and support systems consistent with the required timelines?*
- *Is the SEA plan for providing adequate guidance and other technical assistance to LEAs in developing and implementing teacher and principal evaluation and support systems likely to lead to successful implementation?*
- *Is the pilot broad enough to gain sufficient feedback from a variety of types of educators, schools, and classrooms to inform full implementation of the LEA's evaluation and support systems?*

3.B PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 0 Yes, 7 No	
<i>Rationale</i>	<ul style="list-style-type: none"> Working with educators and stakeholders, the state has developed and put in place strong guidelines and is progressing with plans for implementation across districts; however, plan is lacking evidence of high quality piloting and ongoing analysis and review of measure and instruments.
<i>Strengths</i>	<ul style="list-style-type: none"> The state is attempting to provide many relevant resources for the work related to developing evaluation systems and growth measures.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> No piloting of state and LEA models Full-scale implementation commenced without student growth measures adopted. Lack of evidence presented about where non-RTTT LEAs are in the development and implementation of their evaluation systems.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> Develop clear state plans to monitor fidelity and consistency of implementation to help ensure comparable range of performance among educators across schools and districts. Determine and communicate what data/scores will be reported and analyzed at the state level. Offer guidelines To LEAs for high-quality training and resources for ensuring inter-rater reliability.

Principle 3 Overall Review

Is the SEA's plan for the SEA's and LEAs' development and implementation of teacher and principal evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

PRINCIPLE 3 OVERALL REVIEW PANEL RESPONSE <i>Tally of Peer Responses:</i> 0 Yes, 7 No	
<i>Rationale</i>	<ul style="list-style-type: none"> The state has made a strong commitment to developing and implementing evaluation systems for teachers and principals that will support improved instruction, place emphasis on student achievement and inform personnel decisions; work still remains however to ensure high quality implementation across districts.
<i>Strengths</i>	<ul style="list-style-type: none"> State statute and guidelines are comprehensive and require a significant factor of evaluation be based on student achievement. Results are required to be used to inform meaningful human capital decisions. State has provided significant support to districts in developing high quality systems.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Quality control of implementation will be a challenge with numerous, varied LEA models. Growth model is in the very early stages of development; educators have not been trained in related processes like teacher student data linkages. No field testing of state and RTTT- participating LEA models. For teachers in tested grades and subjects, value-added scores are the exclusive measure of teacher's contribution to student growth. Such a high-stakes focus on a single assessment does not represent a best practice.

PRINCIPLE 3 OVERALL REVIEW

PANEL RESPONSE

Tally of Peer Responses:

0 Yes, 7 No

Technical Assistance Suggestions

- Clearly outline plan for state monitoring, what data will be collected/analyzed and repercussions if LEAs fall out of line with expectations for comparable results.
- Consider additional guidance for LEA requirements around number of observations, quality of training for evaluators, training in on growth models and additional options for developing growth measures in non-tested grades and subjects

Overall Request Evaluation

Did the SEA provide a comprehensive and coherent approach for implementing the waivers and principles in its request for the flexibility? Overall, is implementation of the SEA’s approach likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

OVERALL REQUEST EVALUATION PANEL RESPONSE	
Rationale	<ul style="list-style-type: none"> Florida has been a national leader and has the potential to develop a national model; however, there are several critical weaknesses which are addressable for this to occur.
<i>Strengths</i>	No text
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Participation rate in school grading system is lower than participation rate for AMOs. performance measures and Inclusion criteria for performance component of school grading system currently excludes a significant number of ELs and SWD.
<i>Technical Assistance Suggestions</i>	No text