# STATE PLAN
# PEER REVIEW CRITERIA
## Peer Review Notes Template

## STATE: Alaska



**U.S. Department of Education**

## Background

Peer reviewers apply their professional judgment and experiences when responding to the questions in response to the criteria below. Consistent with section 1111(a)(4)(C) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA), peer reviewers will conduct an objective review of State plans in their totality and out of respect for State and local judgments, with the goal of supporting State- and local-led innovation and providing objective feedback on the technical, educational, and overall quality of a State plan, including the validity and reliability of each element of the State plan. Peer reviewer notes inform the written determination of the Secretary regarding the consolidated State plan.

### Role of the Peer Reviewers

- Each peer reviewer will independently review a consolidated State plan with respect to the criteria for Title I, Part A and Title III, Part A and record his or her responses to the questions. Each peer reviewer will note where changes may be necessary for a State educational agency (SEA) to fully address statutory and regulatory requirements and may also present suggestions to improve the State plan or to highlight best practices. Each peer reviewer will create his or her individual recommendations to guide the in-person review. These individual recommendations are submitted to the Department but will not be shared with the State.
- A panel of peer reviewers will meet in person to discuss each SEA's plan. The panel of peer reviewers will generate one set of peer review notes that reflects its collective review and evaluation of the SEA's consolidated State plan, but the panel is not required to reach consensus. The notes should reflect all peer reviewer perspectives on each requirement.

After the peer review is completed, each SEA will receive the final peer review notes that include the peer reviewers' responses to the questions and any recommendations to improve the SEA's consolidated State plan. The peer review notes: 1) constitute the official record of the peer review panel's responses to questions regarding how an SEA's State plan addresses the statutory and regulatory requirements; 2) provide technical assistance to the SEA on how to improve its State plan; and 3) recommend to the Secretary what, if any, additional information to request from the SEA. Taking into consideration the peer reviewers' recommendations, the Department will provide feedback to each SEA that outlines any areas the SEA must address prior to the Secretary's approval of its consolidated State plan. If a State plan cannot be approved, the Department will offer the SEA an opportunity to revise and resubmit its State plan and have a hearing, consistent with ESEA section 8451.

Consistent with ESEA section 1111(a)(5), the Department will make publicly available all peer review guidance, training, and final panel notes. The names of peer reviewers will be made publicly available at the completion of the review of all consolidated State plans. The peer reviewers for any individual State will not be made publicly available.

## How to Use This Document

The peer review criteria are intended to: 1) support States as they develop their consolidated State plans, and 2) inform peer reviewer panels as they evaluate each consolidated State plan. This document outlines the required elements that an SEA must address in its State plan in order to fully meet the applicable statutory and regulatory requirements. If an SEA has provided insufficient information for peer reviewers to determine whether any requirement is fully addressed, peer reviewers should indicate that the SEA has not fully addressed that requirement and identify what additional information or clarification may be needed. Note that responses to some elements are required only if the specific circumstances addressed in the question are applicable to the SEA submitting the consolidated State plan (*e.g.*, if the SEA establishes an extended-year adjusted cohort graduation rate in addition to a four-year adjusted cohort graduation rate

in item A.4.iii.b.2 below).  For these particular questions, if the circumstances addressed in the question do not apply to the SEA, the SEA is not required to answer the question in order to fully address the statutory and regulatory requirements.

## Instructions

Each peer reviewer should include individual review notes in the space provided below each consolidated State plan requirement.  For each consolidated State plan requirement, a peer reviewer will provide:

- <u>Peer Analysis</u>: Describe the peer reviewer's justification for why an SEA did or did not meet the requirement;
- <u>Strengths</u>: Summarize the strengths of an SEA's response to the State plan requirement;
- <u>Weaknesses</u>: Summarize the weaknesses of an SEA's response to the State plan requirement, including issues, lack of clarity, and possible suggestions for technical assistance; and
- <u>Assessment</u>: Determine if the SEA met the State plan requirement (indicated by Yes/No)
  - If the peer reviewer indicates 'No' above, the peer reviewer must describe the specific information or clarification that a State must provide in order to meet the requirement.

The peer reviewer notes should address all of the required elements of each State plan requirement in this document, but need not address each element individually (*i.e.*, the peer reviewer notes should holistically review A.3.i about the SEA's definition for native languages, incorporating each of the four bulleted items in this element but need not individually respond to each bullet).

# SECTION A: TITLE I, PART A: IMPROVING BASIC PROGRAMS OPERATED BY LEAS

## A.1: Challenging State Academic Standards and Assessments

*Note: State Plan template item A.1 is submitted as part of the separate assessment peer review process consistent with ESEA section 1111(b) and 34 CFR § 200.2(d), and thus has no applicable peer review criteria in this document.*

## A.2: Eighth Grade Math Exception (ESEA section 1111(b)(2)(C) and 34 CFR § 200.5(b)(4))

*Note: State Plan template items A.2.i and A.2.ii require binary yes/no responses from SEAs, and thus have no applicable peer review criteria.*

### A.2.iii: Strategies (ESEA section 1111(b)(2)(C); 34 CFR § 200.5(b)(4))

➢ If applicable,[1] does the SEA describe, regarding the 8th grade math exception, its strategies to provide all students in the State the opportunity to be prepared for and take advanced mathematics coursework in middle school (*e.g.*, appropriate data and evidence that the strategies are likely to provide all students in the State that opportunity)?

|  | *Peer Response* |
|---|---|
| *Peer Analysis* | AK does not currently administer End of Course assessments. However, the state is considering replacing End of Grade tests with End of Course assessments in spring 2019. AK proposes a series of strategies they will use when these assessments become available.<br><br>AK lists a number of strategies related to providing professional development to teachers to make sure students are prepared to take Algebra I in 8th grade. They also mention that they will provide virtual options for rural areas.<br><br>AK does not provide data to suggest that it is taking steps to ensure historically underserved students have the opportunity to take advanced mathematics. |
| *Strengths* | AK is focused on both professional development for teachers and course access for students in rural settings or small schools; additionally, AK will |

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[1] In order for an SEA to exempt an 8th grade student from the mathematics assessment typically administered in 8th grade under ESEA section 1111(b)(2)(B)(v)(I)(aa), it must ensure that: a. the student instead takes the end-of-course mathematics assessment the State administers to high school students under ESEA section 1111(b)(2)(B)(v)(I)(bb); b. the student's performance on the high school assessment is used in the year in which the student takes the assessment for purposes of measuring academic achievement under ESEA section 1111(c)(4)(B)(i) and participation in assessments under ESEA section 1111(c)(4)(E); and c. in high school: (1) the student takes a State-administered end-of-course assessment or nationally recognized high school academic assessment as defined in 34 CFR § 200.3(d) in mathematics that is more advanced than the assessment the State administers for 8th graders under ESEA section 1111(b)(2)(B)(v)(I)(bb); (2) the State provides for appropriate accommodations consistent with 34 CFR § 200.6(b) and (f); and (3) the student's performance on the more advanced mathematics assessment is used for purposes of measuring academic achievement under ESEA section 1111(c)(4)(B)(i) and participation in assessments under ESEA section 1111(c)(4)(E).

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| | incent schools to offer Algebra I in middle school through the accountability system. |
| *Weaknesses* | AK does not include strategies that are outcome based. AK does not clarify that the strategies pertain to all students and schools and/or mandated. The strategies AK provided are not comprehensive.<br><br>AK does not address how it will ensure counseling practices provide all students who are ready access to these courses. |
| *Did the SEA meet all requirements?* | ☒Yes (3 peer reviewer(s))<br>☒No (1 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | One reviewer states AK must provide data to demonstrate how AK is taking steps to provide all students, including historically underserved students, access to 8<sup>th</sup> grade Algebra. AK should include strategies that are outcome based and clarify that the strategies pertain to all students and schools and/or are mandated. |

## A.3: Native Language Assessments (ESEA section 1111(b)(2)(F) and 34 CFR § 200.6(f)(2)(ii) and (f)(4))

### A.3.i: Definition

- ➢ Does the SEA provide its definition of "languages other than English that are present to a significant extent in the participating student population"?
- ➢ Does the SEA identify the specific languages that meet that definition?
- ➢ Does the SEA's definition include at least the most populous language other than English spoken by the State's participating student population?
- ➢ In determining which languages are present to a significant extent in the participating student population, does the SEA describe how it considered languages other than English that are spoken by distinct populations of English learners, including English learners who are migratory, English learners who were not born in the United States, and English learners who are Native Americans?
- ➢ In determining which languages are present to a significant extent in the participating student population, does the SEA describe how it considered languages other than English that are spoken by a significant portion of the participating student population in one or more of the State's LEAs, as well as languages spoken by a significant portion of the participating student population across grade levels?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK does not have a definition of "languages other than English that are present to a significant extent in the participating student population".<br><br>AK identifies Yupik languages (including all dialects) as being represented to the most significant extent (41.8% of all languages other than English). Spanish represents 10% of the languages, followed by Inupiaq and Filipino at over 9% each.<br><br>AK has not currently engaged stakeholders on this topic. However, AK states that it "will work with stakeholders to determine the final definition of languages other than English that are present to a significant extent in the participating student population in grades 3-9" in 2017-18. |

| | |
|---|---|
| | The state does not provide information regarding consideration of languages other than English spoke by distinct populations and does not provide information regarding LEAs. |
| *Strengths* | AK provides data on its languages.<br><br>AK plans to engage a broad stakeholder group, engaging with Alaska Native community members, native speakers, indigenous language experts, tribal leadership, and language experts. |
| *Weaknesses* | AK does not have a definition of "languages other than English that are present to a significant extent in the participating student population".<br><br>AK states that there are approximately 9,535 English learners in the State, in tested grades 3-10. AK does not indicate the percent this group represents of the total number of students.<br><br>AK does not describe how it considered languages other than English that are spoken by distinct populations of English learners, including English learners who are migratory, English learners who were not born in the United States, and English learners who are Native Americans, as well as languages spoken by a significant portion of the participating student population across grade levels.<br><br>AK does not provide its interpretation of the "participating student population." |
| *Did the SEA meet all requirements?* | ☐ Yes (0 peer reviewer(s))<br>☒ No (4 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | AK must provide a definition of "languages other than English that are present to a significant extent in the participating student population." AK must identify languages that meet this definition.<br><br>AK must describe how it considers languages other than English that are spoken by distinct populations of English learners, including English learners who are migratory, English learners who were not born in the United States, and English learners who are Native Americans.<br><br>AK must describe what it considers languages other than English that are spoken by a significant portion of the participating student population in one or more of the State's LEAs, as well as languages spoken by a significant portion of the participating student population across grade levels.<br><br>Two reviewers noted that AK must provide data to support Yupik as the language present to the most significant extent in comparison to its overall student population (i.e. Is Yupik X percent of all students or tested students in AK?). |

## A.3.ii: Existing Assessments in Languages other than English

➢ Does the SEA identify any existing assessments that it makes available in languages other than English, and specify for which grades and content areas those assessments are available?

| | Peer  Response |
|---|---|
| Peer Analysis | The state makes no assessments available in languages other than English. AK met the requirements by identifying zero languages and assessments. |
| Strengths | AK plans to consult with stakeholders during 2017-18. |
| Weaknesses | |
| Did the SEA meet all requirements? | ☒ Yes (4 peer reviewer(s)) <br> ☐ No (0 peer reviewer(s)) |
| If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement | |

## A.3.iii: Assessments not Available and Needed

➢ Does the SEA indicate the languages other than English that are present to a significant extent in the participating student population, as defined by the SEA and identified under A.3.i of the consolidated State plan, for which yearly student academic assessments are not available and are needed?

| | Peer  Response |
|---|---|
| Peer Analysis | The SEA identifies some languages other than English spoken by the State's participating student population but has not yet provided the definition of languages present to a significant extent. <br><br> AK states that the need for assessments in other languages will be determined with stakeholders. |
| Strengths | AK plans to consult with stakeholders during 2017-18. AK has identified Yup'ik languages (and all dialects) for discussion during 2017-18 as the state determines in which languages content assessments are needed. |
| Weaknesses | The SEA does not have a definition of "languages other than English that are present to a significant extent in the participating student population." |
| Did the SEA meet all requirements? | ☐ Yes (0 peer reviewer(s)) <br> ☒ No (4 peer reviewer(s)) |
| If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement | The state is not required to provide assessments in languages other than English, but must provide its definition of "languages other than English that are present to a significant extent in the participating student population" for which yearly student academic assessments are not available and are needed. |

## A.3.iv: Efforts to Develop Assessments

➢ Does the SEA describe how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population, as defined by the SEA and identified under A.3.i of the consolidated State plan template?

- Does the SEA's description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include the State's plan and timeline for developing such assessments?
- Does the SEA's description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include a description of the process the State used to:
  - o 1) gather meaningful input on the need for assessments in languages other than English;
  - o 2) collect and respond to public comment; and
  - o 3) consult with educators, parents and families of English learners, students, as appropriate, and other stakeholders?
- If applicable, does the SEA's description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include an explanation of the reasons (*e.g.*, legal barriers) the State has not been able to complete the development of such assessments despite making every effort?

| | Peer Response |
|---|---|
| Peer Analysis | AK describes to some extent how it will work with stakeholders representing the languages present to a significant extent to consider and determine in which languages content assessments are needed and are feasible. Considerations include in which language an assessment will provide the most accurate and reliable information on what a student knows and can do, as well as how to create assessments in native languages that will be valid and reliable. The process for consultation is expected to begin in 2017-2018. However, it does not provide a full timeline for the process (e.g. the state does not include a timeline for assessment development). |
| Strengths | AK has identified Yup'ik languages as being present to a significant extent among their English Learners, and as such, has clearly outlined groups to be consulted in the development of assessments in Yup'ik dialects. |
| Weaknesses | AK's description of how it will make every effort to develop assessments in languages other than English that are present to a significant extent in the participating student population **does not** include the State's plan and timeline for developing such assessments.<br><br>As AK has not engaged it this process, AK's description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population **does not** include a comprehensive description of the process the State used to:<br>a) gather meaningful input on the need for assessments in languages other than English;<br>b) collect and respond to public comment; and<br>c) consult with educators, parents and families of English learners, students, as appropriate, and other stakeholders (although the SEA specifies how it will consult with Yup'ik languages community members, native Yupik speakers and indigenous language experts, tribal leadership, and educators) |
| Did the SEA meet all requirements? | ☐ Yes (0 peer reviewer(s))<br>☒ No (4 peer reviewer(s)) |
| If no, describe the specific information | AK must provide a definition of "languages other than English that are present to a significant extent in the participating student population." |

| | or clarification that an SEA must provide to fully meet this requirement | AK must implement a process, criteria, timeline, and rules for determining if assessments in languages other than English are necessary. If, according to this process and criteria, assessments in languages other than English are needed, AK must specify for which grades and content areas those assessments would be available.

AK must collect and respond to public comment; and how it consulted with educators, parents, families, students, etc. of populations that speak languages other than Yup'ik (and in addition to Yup'ik). |

## A.4: Statewide Accountability Systems & School Support and Improvement (ESEA section 1111(c) and (d))

### A.4.i: Subgroups (ESEA section 1111(b)(3), 1111(c)(2))

A.4.i.a: Major Racial and Ethnic Subgroups of Students (ESEA section 1111(c)(2)(B))

➢ Does the SEA list each major racial and ethnic group that the SEA includes as a subgroup of students in its accountability system?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK lists the 9-major racial and ethnic group that the SEA includes as a subgroup of students in its accountability system. AK merged Asian and Pacific Islander subgroups into a single group in its calculations. |
| *Strengths* | |
| *Weaknesses* | AK has not provided a rationale for the merger of two commonly recognized separate racial/ethnic groups into a single subgroup (Asian/Pacific Islander).

AK does not provide a definition of "major," which might have led to the above merger, or data pertaining to racial and ethnic groups.

AK does not provide data for Asian and Pacific Islander students separately, and as such, runs the risk of masking performance of one of the two subgroups. |
| *Did the SEA meet all requirements?* | ☒Yes (2 peer reviewer(s))<br>☒No (2 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | Two peer reviewers state AK must either list each racial and ethnic group separately or provide additional data and rationale for the merger of Asian and Pacific Islander students. For example, AK could initially include these two subgroups separately and if the n count requirement is not met then consider the merged subgroup as an additional subgroup. |

A.4.i.b: Additional Subgroups at SEA Discretion

➢ If applicable, does the SEA describe any additional subgroups of students other than the statutorily required subgroups (*i.e.*, economically disadvantaged students, students from each major racial and ethnic group, children with disabilities, and English learners) included in its statewide accountability system?

| | Peer Response |
|---|---|
| *Peer Analysis* | Not applicable |
| *Strengths* | |
| *Weaknesses* | |
| *Did the SEA meet all requirements?* | ☐ Yes (# peer reviewer(s)) <br> ☐ No (# peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.i.c: Previously Identified English Learners

*Note: State Plan template item A.4.i.c requires a binary yes/no response from SEAs, and thus has no applicable peer review criteria.*

A.4.i.d: If Applicable, Exception for Recently Arrived English Learners

*Note: This peer review criterion applies only if a State selects the third option in item A.4.i.d in the consolidated State plan template for recently arrived English learners under which the State applies the exception under ESEA section 1111(b)(3)(A)(i) or the exception under ESEA section 1111(b)(3)(A)(ii) to a recently arrived English learner.*

➢ Does the SEA describe how it will choose which exception applies to a recently arrived English learner (*e.g.*, a statewide procedure that considers English language proficiency level in determining which, if any, exception applies)?

| | Peer Response |
|---|---|
| *Peer Analysis* | AK will apply for the first exception under 1111(b)(3)(A)(i), exempting recently arrived English learners from one administration of the state ELA assessment. |
| *Strengths* | |
| *Weaknesses* | |
| *Did the SEA meet all requirements?* | ☐ Yes (# peer reviewer(s)) <br> ☐ No (# peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

## A.4.ii: Minimum N-Size (ESEA section 1111(c)(3)(A))

A.4.ii.a: Minimum N-Size for Accountability (ESEA section 1111(c)(3)(A)(i))

- ➢ Does the SEA provide the minimum number of students that the State determines is necessary to meet the requirements of any provisions under Title I, Part A of the ESEA that require disaggregation of information by each subgroup of students for accountability purposes, including annual meaningful differentiation and identification of schools?
- ➢ Is the minimum number of students the same State-determined number for all students and for each subgroup of students in the State (*i.e.*, economically disadvantaged students, students from each major racial and ethnic group, children with disabilities, and English learners) for accountability purposes?

|  | *Peer Response* |
|---|---|
| *Peer Analysis* | AK provides the minimum number of students that the state determines is necessary to meet the requirements of any provisions under Title I, Part A of the ESEA that require disaggregation of information by each subgroup of students for accountability purposes, including annual meaningful differentiation and identification of schools. This number is 10 (with data aggregated over three years when n is not met). |
| *Strengths* | The n size balances fairness and transparency. |
| *Weaknesses* | Using a value less than 30 for accountability purposes raises potential reliability concerns when designating a school for sanctions.  Also, there is only so much money to provide for resources. Lower n-sizes may cause less money to be available for those populations who need it most. Plan could be strengthened to provide additional statistical data and clarification regarding reliability of using the n-size. |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s)) <br> ☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* |  |

A.4.ii.b: Statistical Soundness of Minimum N-Size (ESEA section 1111(c)(3)(A)(i))

- ➢ Is the selected minimum number of students statistically sound? [2]

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[2] Consistent with ESEA section 1111(i), information collected or disseminated under ESEA section 1111 shall be collected and disseminated in a manner that protects the privacy of individuals consistent with section 444 of the General Education Provisions Act (20 U.S.C. 1232g, commonly known as the "Family Educational Rights and Privacy Act of 1974").  When selecting a minimum n-size for reporting, States should consult the Institute of Education Sciences report "Best Practices for Determining Subgroup Size in Accountability Systems While

| | *Peer Response* |
|---|---|
| *Peer Analysis* | The n-size presented is small enough to hold the majority of schools accountable for performance within subgroups, and large enough to be statistically valid. Three peer reviewers noted there is sufficient evidence that the n-size presented is statistically sound. AK provides extensive information on the process it used to select the n-size. AK considered the number of students in the all students group as well as those in subgroups that would be included in the accountability system for academic achievement, analyzed data for minimum n-sizes of five, ten, fifteen, and twenty, and provides a chart showing the number of schools that would be included in the accountability system for the all students and subgroups based on one year of data in 2015. The state also considered the impact of data variability from year to year. |
| *Strengths* | The justification for selecting the minimum "n" number of students to form a subgroup is clear.<br><br>AK is to be commended for including data showing the impact of various n-sizes on accountability. This information helps stakeholders understand the number and percent of schools that will be included by subgroup and speaks to the state's commitment to transparency. |
| *Weaknesses* | The state does not provide information on the statistical soundness of their n size. AK does not discuss the error (e.g. sampling and/or measurement) they must account for and their perspective (sampling vs. population) around school accountability.<br><br>With lower n-size, the state runs the risk of a higher standard of error and misidentifying schools for consequences. AK's plan could be strengthened by providing additional statistical data and clarification regarding reliability of using the n-size of 10. |
| *Did the SEA meet all requirements?* | ☒Yes (3 peer reviewer(s))<br>☒No (1 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | One reviewer noted that AK must provide a description of how their n count is statistically sound, including how the n count accounts for error and their perspective on school accountability. |

A.4.ii.c: How the SEA Determined Minimum N-Size (ESEA section 1111(c)(3)(A)(ii))

➤ Does the SEA describe how it determined the minimum number of students?

Protecting Personally Identifiable Student Information" to identify appropriate statistical disclosure limitation strategies for protecting student privacy.

➢ Does the description include how the State collaborated with teachers, principals, other school leaders, parents, and other stakeholders when determining such minimum number?

|  | *Peer Response* |
|---|---|
| *Peer Analysis* | AK describes how it determined the minimum number of students. The description includes how the State collaborated with teachers, principals, other school leaders, parents, and other stakeholders when determining such minimum number. They balanced the feedback they heard with the need for stability. <br><br> AK conducted an analysis to consider various n-sizes. AK analyzed data for minimum n-sizes of 5, 10, 15, and 20; stakeholders preferred an n-size of 5 to 10 in order to include as many subgroups in as many schools as possible. |
| *Strengths* | AK had diverse engagement and involvement of different voices. The committee that proposed the minimum n-size was representative of a diverse population of stakeholders from the state's ESSA Advisory Committee - teachers, principals, parents, educational leaders, and state board of education members. <br><br> The approach was methodical and focused on making sure a feasible number of schools was included, while also maintaining statistical validity and reliability. |
| *Weaknesses* | |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s)) <br> ☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.ii.d: Minimum N-Size and Ensuring Student Privacy (ESEA section 1111(c)(3)(A)(iii))

➢ Does the SEA describe how it ensures that the minimum number of students will protect the privacy of individual students?[3]

|  | *Peer Response* |
|---|---|
| *Peer Analysis* | AK describes how it ensures that the minimum number of students will protect the privacy of individual students by using suppression rules. These rules are based on an n-size of five whether there are two or four reporting categories. The suppression rules are applied to assessment results to prevent the linkage |

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[3] See footnote 5 above for further guidance.

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| | of a particular performance level to a specific student. These rules also serve as a starting point when there is a need to suppress non-assessment data sets, including special education child counts and discipline statistics. |
| *Strengths* | The explanation is thorough and sound.<br><br>The suppression rules are applied to non-assessment data sets as well, as applicable, to ensure student privacy.<br><br>The state has a clear, established protocol for reporting. This is exemplary.<br><br>AK consults with ED's Privacy Technical Assistance Center when necessary for support; AK's suppression rules allow for more specific ranges to be published as the tested student n-size increases. |
| *Weaknesses* | |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.ii.e: If Applicable, Minimum N-Size for Reporting

➤ If the SEA's minimum number of students for purposes of reporting is lower than the minimum number of students for accountability purposes, does the SEA provide the minimum number of students for purposes of reporting?
➤ Is the SEA's minimum number of students for purposes of reporting consistent with the requirements in ESEA section 1111(i), including with respect to privacy and statistical reliability?

| | *Peer  Response* |
|---|---|
| *Peer Analysis* | AK's minimum number of students for purposes of reporting is lower than the minimum number of students for accountability purposes. AK's minimum number of students for purposes of reporting is five (5). AK's suppression rules are based on an n-size of 5 whether there are two or four reporting categories.<br><br>Three peer reviewers found that AK's minimum number of students for purposes of reporting is consistent with the requirements in ESEA section 1111(i), including with respect to privacy and statistical reliability. Their explanation for privacy is clear and compelling. |
| *Strengths* | AK's percentage range reported is broad for small n-sizes; as the n-size increases, the percentage range published becomes more specific; this maintains privacy while providing valuable performance data in public reports. |
| *Weaknesses* | One peer reviewer noted that AK does not provide evidence to support how the n size of 5 is statistically sound. AK does not include data regarding the reliability of using an n size of 5 for reporting. |
| *Did the SEA meet* | ☒Yes (3 peer reviewer(s)) |

| | |
|---|---|
| *all requirements?* | ☒No (1 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | The state must provide an explanation of how an n size of 5 is statistically reliable. |

## A.4.iii: Establishment of Long-Term Goals (ESEA section 1111(c)(4)(A))

A.4.iii.a: Academic Achievement (ESEA section 1111(c)(4)(A)(i)(I)(aa))

A.4.iii.a.1: Long-term goals

➢ Does the SEA identify (*i.e.*, by providing a numeric measure) and describe the long-term goals for all students for improved academic achievement, as measured by grade-level proficiency on the annual statewide reading/language arts and mathematics assessments (which must apply the same academic achievement standards to all public school students in the State, except those with the most significant cognitive disabilities)?
➢ Does the SEA identify and describe long-term goals for each subgroup of students?
➢ Does the SEA's description include baseline data for all students and for each subgroup of students?
➢ Does the SEA's description include the timeline for meeting the long-term goals?
➢ Is the timeline the same multi-year length of time for all students and for each subgroup of students?
➢ Are the long-term goals ambitious?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK identifies, by providing a numeric measure, and describes the long-term goals for all students for improved academic achievement, as measured by grade-level proficiency on the annual statewide reading/language arts and mathematics assessments. |
| | The state aims to decrease the percent of students not scoring proficient by half over a ten year period. The rate of improvement required is ambitious based on current data. The long term goals require some groups to grow almost five percentage points, which, based on national or other states' data, is ambitious. |
| | The state provides baseline data for all students and each subgroup as well as a timeline for meeting the goals (2026-2027). Baseline data is given by the results on the 2017 PEAKS. The percentage of students scoring at least proficient on PEAKS was 38.4% on ELA and 31.8% in math. At the end of ten years, the long-term goal for ELA for all students will be 69.2% proficient or advanced, and in math it will be 65.9% proficient or advanced. |
| *Strengths* | The calculation for figuring out the goals is clear and understandable. It requires faster growth for those furthest behind. |
| | AK recognizes differences in baseline ELA and math performance, and further considers subgroup performance differences in the establishment of long-term goals, while at the same time setting goals to reduce gaps among subgroups. |
| | The state's timeline recognizes the sense of urgency for improvement in |

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| | student achievement. |
| *Weaknesses* | AK does not provide details around how it will support schools to meet these goals, especially for the historically underserved student groups.<br><br>Annual improvement targets between 2016/17-2026/27 appear to be linear (between 2.4 to 4.8 points per year), but linear growth is not a realistic expectation. This could yield a higher than expected number of schools labeled "failing," which will result in lower public investment in ratings and/or too few dollars going to most at-risk schools. Linear growth, especially in historically underperforming groups, may be unrealistic. Peers encourage state to monitor interim progress measures over the early years to evaluate what, if any, targets may need to be revised.<br><br>Goals could be more rigorous – both ELA and math are less than 70% by 2026-27 for All Students.<br><br>AK indicates that it intends to "re-set the long-term goal in the future to reflect the importance of continuing to increase the percentage of students attaining proficiency on the ELA and mathematics assessment." If AK adjusts goals based on actual proficiency, this could lead to downward adjustment of goals to align with actual performance, diminishing the importance of the goals.<br><br>The long-term goals for "all students" in ELA (69.2%) and Math (65.9%) are <u>higher</u> than the goals for any student group except the Caucasian group (ELA 76.5%; Math 71.7%) and the Two/more races group (ELA 69.4%; Math 67.0%).  This would indicate that the AK student population is <u>heavily</u> Caucasian in order for the all students goal to be met. The plan should provide some justification for this. |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.iii.a.2: Measurements of interim progress
- ➤ Does the SEA provide measurements of interim progress toward meeting the long-term goals for all students?
- ➤ Does the SEA provide measurements of interim progress toward meeting the long-term goals for each subgroup of students?

| | *Peer  Response* |
|---|---|
| *Peer Analysis* | AK provides measurements of interim progress toward meeting the long-term goals for all students in Appendix A. The measures of interim progress are provided for each identified subgroup and for All Students. |
| *Strengths* | AK will establish school and district measures of interim progress, recognizing differences among schools. |
| *Weaknesses* | There is no explanation related to how some subgroups (such as English |

Language Learners, Students with Disabilities and AK Natives) are expected to grow at the stated rate. Without knowing what supports and interventions AK plans to provide, these goals will be difficult to attain given the historical performance of these subgroups.

It would be more user friendly to hyperlink to Appendix A in the body of this document.

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| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s)) <br> ☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.iii.a.3: Improvement necessary to close statewide proficiency gaps

➢ Do the long-term goals and measurements of interim progress for academic achievement take into account the improvement necessary for subgroups of students who are behind in reaching those goals to make significant progress in closing statewide proficiency gaps, such that the State's long-term goals require greater rates of improvement for subgroups of students that are lower achieving?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | The methodology employed by AK for setting long-term goals and MIPs – cut the proficiency gap in half over the life of the timeline – results in a narrowing of the proficiency gaps for those student subgroups that are behind. AK states that it selected this methodology (as opposed to the same fixed goal for all subgroup) in order to provide more realistic goals. A fixed goal would have resulted in more significant progress for subgroups that are furthest behind. |
| *Strengths* | Uniform methodology that leads to more equitable outcomes. <br> AK clearly describes the annual increment needed by each subgroup in both ELA and mathematics. <br><br> The state's timeline recognizes the sense of urgency for improvement for student groups. |
| *Weaknesses* | Without knowing what supports and interventions AK plans to provide, these goals will be difficult to attain given the historical performance of these subgroups. <br><br> The plan could be strengthened by providing a narrative to accompany the graphs on pages 17 and 18. <br><br> The starting points for several low-performing groups (ELs, SWDs) are so low that the long-term goals result in just over half of these groups being proficient. |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s)) <br> ☐ No (0 peer reviewer(s)) |

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| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.iii.b: Graduation Rate (ESEA section 1111(c)(4)(A)(i)(I)(bb))

A.4.iii.b.1: Long-term goals for four-year adjusted cohort graduation rate

➢ Does the SEA identify and describe the long-term goals for the four-year adjusted cohort graduation rate for all students?
➢ Does the SEA identify and describe the long-term goals for the four-year adjusted cohort graduation rate for each subgroup of students?
➢ Does the SEA's description include baseline data for all students and for each subgroup of students?
➢ Does the SEA's description include the timeline for meeting the long-term goals?
➢ Is the timeline the same multi-year length of time for all students and for each subgroup of students?
➢ Are the long-term goals ambitious?

| | *Peer  Response* |
|---|---|
| *Peer Analysis* | Alaska uses the same long-term goal of 90% for the four-year adjusted cohort graduation rate for all students and for each subgroup of students by the school year 2026-27.<br><br>The state's description includes baseline data for all students and for each subgroup of students in the graph on page 18.<br><br>Given the baseline, this is ambitious. It is particularly ambitious for certain student groups. The state's timeline recognizes the sense of urgency for improvement in student achievement. |
| *Strengths* | Goals are clear and well stated. The goals are ambitious because they eliminate the achievement gaps in graduation rate on an urgent timeline while requiring an improvement for all student groups.<br><br>The state provides a historical chart of the change in the 4-year ACGR by subgroup as reference and as justification for selecting a fixed 4-year ACGR goal.<br><br>AK examined five years of graduation data by subgroup in setting long-term goals for the four-year ACGR. |
| *Weaknesses* | Goals for some subgroups require extreme growth without details on support to get to goal.<br><br>It is important to note that expecting all student subgroups to achieve a 90% 4-year ACGR when their academic proficiency hovers just over half appears to indicate that AK will award many students a regular high school diploma (as defined by ESSA) who are not proficient in ELA or Math or both. |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |

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| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.iii.b.2: If applicable, long-term goals for each extended-year adjusted cohort graduation rate

➢ If applicable (*i.e.*, if the SEA chooses, at its discretion, to establish long-term goals for one or more extended-year rates), does the SEA identify and describe the long-term goals for each extended-year adjusted cohort graduation rate for all students?
➢ If applicable (*i.e.*, if the SEA chooses, at its discretion, to establish long-term goals for one or more extended-year rates), does the SEA identify and describe the long-term goals for each extended-year adjusted cohort graduation rate for each subgroup of students?
➢ Does the SEA's description include baseline data for all students and for each subgroup of students?
➢ Does the SEA's description include the timeline for meeting the long-term goals?
➢ Is the timeline the same multi-year length of time for all students and for each subgroup of students?
➢ Are the long-term goals ambitious?
➢ Are the long-term goals more rigorous than the long-term goals set for the four-year adjusted cohort graduation rate?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK proposes the same long-term goal of 93% for the five-year adjusted cohort graduation rate for all students and for each subgroup of students by the school year 2026-27.<br><br>AK's description includes baseline data for all students and for each subgroup of students.<br><br>The long-term goals are ambitious and more rigorous than the long-term goals set for the four-year adjusted cohort graduation rate (93% graduation rate for one or more extended-year rates v. 90% graduation rate for the 4-year adjusted cohort). |
| *Strengths* | AK examined five years of graduation data by subgroup in setting long-term goals for the five-year ACGR; further, AK recognizes that some students may need longer than five years to earn a diploma. |
| *Weaknesses* | |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.iii.b.3: Measurements of interim progress

➢ Does the SEA provide measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate for all students?

➢ Does the SEA provide measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate for each subgroup of students?

| | Peer Response |
|---|---|
| Peer Analysis | AK provides measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate and the five-year adjusted cohort graduation rate for each subgroup of students. |
| Strengths | AK has set the same target for each subgroup in an effort to eliminate subgroup gaps. |
| Weaknesses | While goals are ambitious, especially for the most at-risk/challenged groups, there is little discussion about a) how underperforming subgroups will be monitored for progress and b) interventions to ensure all students meet goals. |
| Did the SEA meet all requirements? | ☒ Yes (4 peer reviewer(s)) <br> ☐ No (0 peer reviewer(s)) |
| If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement | |

A.4.iii.b.4: Improvement necessary to close statewide graduation rate gaps

➢ Do the long-term goals and measurements of interim progress for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate take into account the improvement necessary for subgroups of students who are behind in reaching those goals to make significant progress in closing statewide graduation rate gaps, such that the State's long-term goals require greater rates of improvement for subgroups of students that graduate from high school at lower rates?

| | Peer Response |
|---|---|
| Peer Analysis | AK's goals require the complete closure of graduation rate gaps between student groups.  This requires student groups with currently low rates to make ambitious progress over the next ten years. |
| Strengths | The goal is ambitious for gap closure. The visuals provided help the reader visualize the gap closure. <br><br> The fixed goal methodology provides greater rates of improvement for subgroups of students that graduate from high school at lower rates than the methodology for academic achievement. <br><br> AK clearly depicts baseline data and gap closure among subgroups required to meet long-term goals for both four-year ACGR and five-year ACGR. |
| Weaknesses | Goals are ambitious, but there is little information about how underperforming |

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| | groups will catch up at rates necessary to meet long-term goals. |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s)) <br> ☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.iii.c: English Language Proficiency (ESEA section 1111(c)(4)(A)(ii))

A.4.iii.c.1: Long-term goals

➢ Does the SEA identify and describe the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency, as measured by the statewide English language proficiency assessment?
➢ Does the SEA's description include baseline data?
➢ Does the SEA's description include the State-determined timeline for English learners to achieve English language proficiency?
➢ Is the long-term goal ambitious?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK identifies and describes the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency, as measured by the statewide English language proficiency assessment (70%). This goal includes the percentage of ELs meeting the target for making progress in learning English. <br><br> AK used ACCESS for ELLs 1.0 in 2012, when baseline data was established, and now uses ACCESS for ELLs 2.0. The new baseline data will be determined from the 2016-17 ACCESS for ELLs 2.0 State ELP assessment. <br><br> AK's timeframe for reaching proficiency will depend on a student's initial overall composite proficiency level, but will not be more than seven years, including the year of identification. |
| *Strengths* | AK cites research and stakeholder feedback in determining these goals. <br><br> AK details data analysis completed on recent WIDA ACCESS administrations; data was considered in the establishment of long-term goals. |
| *Weaknesses* | A seven-year timeframe for reaching proficiency could result in students served under Title III being flagged as long-term English learners. |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s)) <br> ☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet* | |

A.4.iii.c.2: Measurements of interim progress

➢ Does the SEA provide measurements of interim progress toward the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK provides MIPs for EL progress in Appendix A. The annual increment projected is 2.3% per year. The estimate is based on the 2014-2015 data, when AK was using WIDA 1.0. |
| *Strengths* | AK states that it will update its baseline data based on the results of the 2016-2017 assessments. |
| *Weaknesses* | |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

## A.4.iv: Indicators (ESEA section 1111(c)(4)(B), 1111(c)(4)(E)(ii))

*Note: A single indicator may consist of multiple components or measures. Peers must review each such component or measure for compliance with all of the required elements.*

A.4.iv.a: Academic Achievement

➢ Does the SEA describe the Academic Achievement indicator used in its statewide accountability system, including that the SEA uses the same indicator for all schools in all LEAs across the State?
➢ Does the description include how the SEA calculates the indicator, including: 1) that the calculation is consistent for all schools, in all LEAs, across the State; 2) a description of the weighting of reading/language arts achievement relative to mathematics achievement; 3) if the State uses one, a description of the performance index; 4) if, at the high school level, the indicator includes a measure of student growth, a description of the growth measure (*e.g.*, a growth model); and 5) if the State averages data, a description of how it averages data across years and/or grades (*e.g.*, does the State use a uniform averaging procedure across all schools)?
➢ Is the indicator valid and reliable?
➢ Is the indicator based on the SEA's long-term goals?
➢ Can the indicator be disaggregated for each subgroup of students?
➢ Is the indicator measured by grade-level proficiency on the annual statewide reading/language arts and mathematics assessments?
➢ Does the indicator measure the performance of at least 95 percent of all students and 95 percent of all students in each subgroup?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK describes the Academic Achievement indicator used in its statewide accountability system, including that it uses the same indicator for all schools in all LEAs across the State.<br><br>AK measures the % of students scoring at the proficient or advanced achievement levels on the statewide assessment in ELA and mathematics. AK states that the weighting of reading/language arts achievement is equal to mathematics achievement.<br><br>AK calculates the percentage by dividing the number of students scoring at proficient or advanced by the number of students tested, or 95% of the full academic year students enrolled at the school who were eligible to test, whichever is greater.<br><br>AK will use an average of math and ELA performance to determine the achievement indicator. The way the indicator will be scaled will be based on the state's goals. This indicator will be calculated for all students and student subgroups. However, only all students' data will be used in the accountability index. |
| *Strengths* | Based solely on proficiency/status. Easy to understand. |
| *Weaknesses* | AK will not use student subgroup data in the calculation of accountability determinations. Given the low performance of some student subgroups as evidenced by the AK's baseline data, the lack of inclusion of subgroup calculations in accountability determinations could result in masked student performance. AK should consider disaggregating subgroup data for purposes of accountability to emphasize the importance of subgroup achievement. |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.iv.b: Other Academic Indicator for Elementary and Secondary Schools that are Not High Schools

*Note: If the SEA uses a different Other Academic indicator for each grade span, peer reviewers must separately review each indicator that an SEA submits. For example, if an SEA submits one Other Academic indicator for elementary schools and a different Other Academic indicator for middle schools, then peer reviewers will provide feedback, using the criteria below, separately for each indicator.*

➢ Does the SEA describe the Other Academic indicator used in its statewide accountability system for public elementary and secondary schools that are not high schools, including that the SEA uses the same indicator and calculates it in the same way for all elementary and secondary schools that are not high schools, in all LEAs, across the State, except that the indicator may vary by each grade span?
➢ Does the SEA describe, if applicable, how it averages data across years and/or grades (*e.g.*, does the State use a uniform averaging procedure across all schools)?

- If the SEA uses a different indicator for each grade span, does it describe each indicator, including the grade span to which it applies?
- If the Other Academic indicator is not a measure of student growth, is the indicator another valid and reliable statewide academic indicator?
- If the Other Academic indicator is not a measure of student growth, does the indicator allow for meaningful differentiation in school performance?
- Can the indicator be disaggregated for each subgroup of students?

|  | Peer Response |
| --- | --- |
| Peer Analysis | AK uses academic growth on the statewide assessment for students in grades 4-8 as the Other Academic indicator. Growth is measured for individual students in the school according to a value table. The table assigns values to the achievement level change in a student's assessment score from the previous year to the current year. The assessment scores are reported on four achievement levels. The growth value table measures changes in student performance within each achievement level. To determine the school or subgroup growth score, all of the individual student point values are totaled and then divided by the total number of students for whom growth can be calculated. <br><br> The academic growth score is calculated and reported for ELA and mathematics. <br><br> The academic growth score is weighted equally for the "all students" group and for each subgroup in the school. <br><br> The total number of students for whom growth can be calculated is defined to include those students who received valid scores during both the previous year and the current year test administrations and who were enrolled for the full academic year. |
| Strengths | This metric considers all growth not just growth to proficiency. <br><br> AK measures growth within achievement levels, measuring more granular changes in student performance. |
| Weaknesses | This indicator does not include students who did not receive valid scores during both the previous year and the current year test administrations and retained students. |
| Did the SEA meet all requirements? | ☒ Yes (4 peer reviewer(s)) <br> ☐ No (0 peer reviewer(s)) |
| If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement | |

A.4.iv.c: Graduation Rate

➢ Does the SEA describe the Graduation Rate indicator used in its statewide accountability system for public high schools in the State, including that the SEA uses the same indicator across all LEAs in the State?
➢ Does the description include how the SEA calculates the indicator including: 1) that the calculation is consistent for all high schools, in all LEAs, across the State; 2), if applicable, whether the SEA chooses to lag adjusted cohort graduation rate data; and 3) if applicable, how the SEA averages data (*e.g.*, consistent with the provisions in ESEA section 8101(23) and (25), which permit averaging graduation rate data over three years for very small schools)?
➢ Is the indicator valid and reliable?
➢ Is the indicator based on the SEA's long-term goals?
➢ Is the indicator based on the four-year adjusted cohort graduation rate?
➢ If the State, at its discretion, also includes one or more extended-year adjusted cohort graduation rates, does the description include how the four-year adjusted cohort graduation rate is combined with that rate or rates within the indicator?
➢ If applicable, does the SEA's description include how the State includes in its four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rates students with the most significant cognitive disabilities assessed using an alternate assessment aligned to alternate academic achievement standards under ESEA section 1111(b)(2)(D) and awarded a State-defined alternate diploma under ESEA section 8101(23) and (25)?
➢ Can the indicator be disaggregated for each subgroup of students?

| | Peer  Response |
|---|---|
| Peer Analysis | This indicator will measure and report graduation rates both for the four-year adjusted cohort, and for the five-year adjusted cohort. <br><br> AK states that the indicator will be measured and reported for all students and all subgroups, for the purpose of inclusion in the index. Schools will earn points for the "all students" group based on identified graduation levels of the four-year graduation rate, with the greatest number of points being earned for a four-year graduation rate that meets or exceeds the long-term goal of 90%. Additional points are earned based on performance levels for a five-year rate, with the greatest points earned for a rate that meets or exceeds the long-term goal of 93%. <br><br> AK does not award State-defined alternate diplomas. |
| Strengths | AK explains that the four-year graduation rate will be weighted at 20% and the five-year graduation rate will be weighted at 10%. |
| Weaknesses | Although the graduation indicator can be disaggregated by student subgroup, AK does not explicitly state it will disaggregate this indicator by subgroup for accountability purposes. Given that AK has graduation rate goals for each subgroup, the inclusion of subgroup performance in accountability would further incent the state and its schools to address subgroup outcomes. |
| Did the SEA meet all requirements? | ☒  Yes (4 peer reviewer(s)) <br> ☐ No (0 peer reviewer(s)) |
| If no, describe the specific information or clarification that an SEA must | |

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| *provide to fully meet this requirement* | |

A.4.iv.d: Progress in Achieving English Language Proficiency Indicator

- ➢ Does the SEA describe the Progress in Achieving English Language Proficiency indicator used in its statewide accountability system, including that the SEA uses the same indicator across all LEAs in the State?
- ➢ Is the indicator valid and reliable?
- ➢ Is the Progress in Achieving English Language Proficiency indicator aligned with the State-determined timeline described in A.4.iii.c.1?
- ➢ Does the indicator consistently measure statewide the progress of all English learners in each of grades 3 through 8 and in the grade for which such English learners are otherwise assessed under ESEA section 1111(b)(2)(B)(v)(I) during grades 9 through 12?
- ➢ Does the SEA's description include the State's definition of English language proficiency, based on the State English language proficiency assessment?

| | *Peer  Response* |
|---|---|
| *Peer Analysis* | AK uses the ACCESS for ELLs 2.0 test to measure English language development.<br><br>English language proficiency (ELP) and exit criterion are defined as achieving a composite score of 4.5 for the four domains, with a minimum score of 3.8 in writing and 4.0 in all other domains. Students remain identified as English learners until the end of the school year in which they reach the proficiency level on the ACCESS for ELLs 2.0 assessment and are exited from EL status.<br><br>Students receive a growth target for each year along their path to proficiency. Targets require faster growth at lower levels of proficiency (based on research and historical data, scores tend to improve faster at lower scale scores than at higher ones).<br><br>An EL student is considered to have made progress if the student earned at least the expected increase in the overall composite proficiency levelfrom the previous year. An EL student who reaches the criteria for attaining proficiency is also considered as having made progress.<br><br>The Progress in Achieving English Language Proficiency indicator is aligned with the state-determined timeline and long-term goals.<br><br>The state's approach to the ELPA indicator measures the percent of EL students making progress in English proficiency. Schools receive points based off of how their data compares to the state's long-term goals. The state is changing the definition of proficiency to align with the changes to ACCESS 1.0. |
| *Strengths* | The procedure for determining progress reflects research and best practices.<br><br>AK has set exit criteria at a 4.5 composite proficiency level with a minimum 3.8 in writing and 4.0 in other domains. |
| *Weaknesses* | It is unclear whether this measure includes only students in the tested grades or |

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| | all students in grades 1 through 12.<br><br>A seven-year timeframe for reaching proficiency could result in students served under Title III being flagged as long-term English learners. |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.iv.e: School Quality or Student Success Indicator(s)

*Note: Peer reviewers must separately review each School Quality or Student Success indicator that an SEA submits. For example, if an SEA submits one School Quality or Student Success indicator for high schools and a different School Quality or Student Success indicator for elementary and middle schools, then peer reviewers will provide feedback, using the criteria below, separately for each indicator. For any School Quality or Student Success indicator that does not apply to all grade spans, the SEA's description must include the grade spans to which it does apply. (ESEA section 1111(c)(4)(B)(v))*

➢ Does the SEA describe each School Quality or Student Success indicator used in its statewide accountability system for all public schools in the State?
➢ If the SEA uses a different indicator for each grade span, does it describe each indicator, including the grade span to which it applies?
➢ Does the indicator allow for meaningful differentiation in school performance?
➢ Is the indicator valid, reliable, comparable, used statewide in all schools (for the grade span to which it applies), and calculated in a consistent way?
➢ Can the indicator be disaggregated for each subgroup of students?

| | *Peer Response* |
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| *Peer Analysis* | AK proposes to use several School Quality or Student Success (SQSS) measures. The plan states that "For each SQSS indicator, performance will be measured and reported for all students and all subgroups. Schools will earn points for the performance of the all students group." The indicators provide for meaningful differentiation in school performance.<br><br>It appears that the subgroup scores are not part of the statewide accountability system for all public schools in the State.<br><br>All metrics proposed for inclusion provide useful information to districts and schools. The measures focus on readiness across the K-12 continuum. The state provides a research base for each indicator.<br><br>SQSS indicators planned for the 2017-2018 SY include:<br><br>    i.   **Chronic absenteeism** will be used across all grades. Schools will earn points for the indicator with the greatest number of |

points for the lowest rates of chronic absenteeism.

    ii. **Reading by Grade 3** is included for grade span K-8. Schools will earn points based on the percentage of students scoring proficient or advanced on the state ELA assessment in grade 3.

    iii. **Interim Assessments, District-selected** is included in grade span K-8. The indicator will be measured by the percentage of full academic year students enrolled in a school who participated in at least a fall and winter administration of a state-approved interim assessment. Schools will earn the greatest number of points for the greatest participation in the interim assessments.

    iv. **Freshman on-track credit accumulation** is included in grade span 9-12. This indicator will measure the percentage of first-time 9th graders who earn at least 5 credits by the end of their first year in high school with at least 4 credits from the content areas of language arts, social studies, mathematics, or science.

    v. **Alaska Performance Scholarship (APS) eligibility** is included in grade span 9-12. This indicator will measure the percentage of graduating seniors that qualify for any level of the Alaska Performance Scholarship.

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| *Strengths* | **Chronic absenteeism:** AK defines chronic absenteeism as missing 10% of the instructional days a student was enrolled, which is considered best practices. Acknowledgement that the SEA has unique circumstances that exacerbate the rates of chronic absenteeism that would not typically affect most schools in the other states.<br><br>**Reading by Grade 3** incentivizes schools to attend early to students who struggle with literacy. The use of the $3^{rd}$ grade reading metric is a useful way to hold K-2 teachers and schools accountable.<br><br>**Interim Assessment Participation** is an innovative way to get districts to formatively assess in a low stakes way.<br><br>**Freshman on-track credit accumulation** is a clear predictor of high school graduation.<br><br>The use of **APS eligibility** is a useful measure for both schools and students because it provides a data point for whether students are graduating ready students. |
| *Weaknesses* | **Chronic absenteeism** is measured based on the percentage of all full academic year students that meet the definition of chronically absent of missing 10% or more of the days they were enrolled. The indicator does not include students who are considered less than "full academic year" students.<br><br>**Reading by Grade 3** indicator may provide a perverse incentive to retain students. AK does not provide details about how this indicator will allow for |

meaningful differentiation.

**Interim Assessments, District-selected – Grade span K-8**: The indicator does not allow for meaningful differentiation in school performance, since schools are not required to administer these assessments. The indicator is not valid, reliable, comparable, used statewide in all schools (for the grade span to which it applies), or calculated in a consistent way, because various districts and schools could be using different interims. The quality and rigor level of the interim assessments could be different from school to school or district to district. Without a curriculum scope-and-sequence in place and articulated common end-goal assessments, it is not clear how consistency will be achieved across classrooms, from teacher to teacher, campus to campus, district to district. If assessments define rigor, then they must be common across all classes and grade levels in the State; otherwise, equal rigor cannot be guaranteed in each classroom. Measuring outcomes is only useful if you know what the target should be. If the target is different in each classroom, then we have no way to know how students are doing across the cohort relative to each other. It is unclear if this indicator can be disaggregated for each subgroup of students. Giving points for <u>participation</u> (as opposed to growth or achievement) is not a way to measure academic achievement.

**Freshman on-track credit accumulation**: This is an indicator for a grade (end of 9th grade), and not for the 9-12 grade span. There is no explanation related to how this indicator will be measured for the "all students" group and for each subgroup of students. There is no explanation how this indicator is calculated for high mobility/transient students, and whether there is a requirement that students attend a certain school for a given number of school days to be part of the reporting and accountability system of that school.

**In General:**

Due to lack of details it is difficult to determine if the SQSS indicators allow for meaningful differentiation. It would be helpful for AK to provide a distribution of school performance on each indicator.

The use of multiple measures, three of which do not appear to be currently collected, requires a lot of data entry work for schools.

Awarding points ONLY for the performance of the all students group undermines the purposes of ESSA.

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| *Did the SEA meet all requirements?* | ☒Yes (2 peer reviewer(s))<br>☒No (2 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | Two reviewers noted that AK must provide information about how the interim assessment participation indicator is valid and reliable and provides for meaningful differentiation of school. The reviewers noted that AK must also provide information on how this indicator is comparable across schools. |

## A.4.v: Annual Meaningful Differentiation (ESEA section 1111(c)(4)(C))

A.4.v.a: State's System of Annual Meaningful Differentiation

➢ Does the SEA describe its system of meaningfully differentiating, on an annual basis, all public schools in the State?

➢ Is the State's system of annual meaningful differentiation based on all indicators in the State's accountability system?

➢ Does the State's system of annual meaningful differentiation include the performance of all students and each subgroup of students on each of the indicators in the State's accountability system?

|  | *Peer Response* |
|---|---|
| *Peer Analysis* | Schools earn points based on their performance level on each indicator. The number of points earned is the sum of the points earned for each indicator according to the point attribution tables. Each school receives an overall score from 0 to 100, along with one of the five designations. The criteria for each designation include a minimum overall score, as well as minimum thresholds on each indicator to be determined by the business rules. The designations are mutually exclusive in any given school year. <br><br> Students are included in the applicable accountability indicators (except graduation rate) if they have been enrolled continuously in a school for a full academic year (FAY) as of October 1 through the first day of testing. <br><br> AK labels each school with one of five labels based on the all students' index and subgroup performance in relationship to their goals. Each indicator is considered. |
| *Strengths* | Five levels of school performance provide a continuum to differentiate schools. <br><br> AK includes all indicators in the accountability system to differentiate schools, and clearly outlines process for weighted calculation of schools with a blend of K-8 and 9-12 students. |
| *Weaknesses* | It is not clear if the AK's system of annual meaningful differentiation includes the performance of all students and each subgroup of students on each of the indicators in the State's accountability system. <br><br> AK's points system still needs to be developed. |
| *Did the SEA meet all requirements?* | ☒Yes (2 peer reviewer(s)) <br> ☒No (2 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | AK must describe how the system of annual meaningful differentiation includes the performance of all students and each subgroup of students on each of the indicators in the State's accountability system. (2 reviewers) <br><br> AK must provide a more robust description of the 100 point index system, which includes cut scores for each band of performance. (1 reviewer) |

A.4.v.b: Weighting of Indicators

- ➢ Does the SEA describe the weighting of each indicator in its system of annual meaningful differentiation, including how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students (*e.g.*, for the Progress in Achieving English Language Proficiency indicator)?
- ➢ Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators each receive substantial weight individually?
- ➢ Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators receive, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate?

|  | *Peer Response* |
|---|---|
| *Peer Analysis* | AK describes the weighting of each indicator in its system of annual meaningful differentiation, including how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students. If the subgroup minimum n-size is not met for a school, data will be aggregated from the previous two years with the current school year to meet the minimum size. If the minimum n-size cannot be met with three years of data, the indicator will not be included for that school. The remaining indicators will be prorated so that the indicators carry the same relative weights as other schools. |
|  | The indicators each receive substantial weight individually. The Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators receive, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate. |
| *Strengths* | Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators receive, in the aggregate, much greater weight than the School Quality or Student Success indicator(s) |
|  | Plan provides data/modeling for reference. |
|  | Growth receives substantial weight for K-8. This provides the opportunity for all schools to show success. The explanation the state provides for variant grade configurations is fair and transparent. |
|  | The graduation rate indicator is given substantial weight. |
|  | AK uses a 100-point system, which is a scale that the public can understand; weighting of indicators by grade span allows for different SQSS indicators at grades K-8 and 9-12 to be combined. |
| *Weaknesses* | One reviewer expressed concern over whether the weight of 14/15 points is substantial enough to meet the criteria for Growth towards proficiency for EL students. |
|  | The weighting of the additional indicators, particularly interim assessment, may be too low to incentivize behavior. |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s)) |

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| | ☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.v.c: If Applicable, Different Methodology for Annual Meaningful Differentiation

➢ If the SEA uses a different methodology or methodologies for annual meaningful differentiation than the one described in 4.v.a of the State's plan for schools for which an accountability determination cannot be made (*e.g.*, P-2 schools), does it describe the different methodology or methodologies, including how the methodology or methodologies will be used to identify schools for comprehensive or targeted support and improvement?
➢ Does the SEA's description of a different methodology indicate the type(s) of schools to which it applies?

| | *Peer Response* |
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| *Peer Analysis* | AK will work with stakeholders to determine appropriate indicators and point attribution tables for ambitious performance levels for an alternative accountability for special schools (such as alternative schools, juvenile justice facility schools, schools for deaf and blind students, or schools focused solely on students with disabilities or English learners). The performance of these schools on the indicators in the accountability system in 2017-2018 will be reported, but overall scores and designations will be determined for these schools in 2019-2020, based on data from 2018-2019.<br><br>AK provides an explanation for its alternative system, including K-2 schools receiving a determination based on the data they have and the $3^{rd}$ grade indicator, schools with low n counts will have their data aggregated across three years for evaluations, and newly opened schools will have no determination until year two. |
| *Strengths* | One reviewer noted AK is deliberately addressing the performance of schools with special populations, such as those housed within juvenile justice facilities. |
| *Weaknesses* | The state does not currently specify its plan to hold alternative schools and other non-traditional schools accountable.<br><br>Schools with special populations should not be excluded from the base statewide accountability system. AK's plan to "work with stakeholders to determine appropriate indicators and point attribution tables for ambitious performance levels for an alternative accountability system for these special schools" is not allowed under ESSA. AK also plans to exclude these schools from receiving any designation until 2019-2020. Such an approach would serve to incentivize putting students (such as students with disabilities and ELs) into separate schools to avoid including these students in the statewide accountability system. |
| *Did the SEA meet all requirements?* | ☒Yes (2 peer reviewer(s))<br>☒No (2 peer reviewer(s)) |

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| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | Two reviewers noted that AK must fully describe its plan for schools for which an accountability determination cannot be made and describe the different methodology or methodologies, including how the methodology or methodologies will be used to identify schools for comprehensive or targeted support and improvement. |

## A.4.vi: Identification of Schools (ESEA section 1111(c)(4)(D), 1111(d)(2)(C)-(D))

A.4.vi.a Comprehensive Support and Improvement Schools—Lowest Performing

➢ Does the SEA describe its methodology to identify not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement including, if applicable, how it averages data (*e.g.*, does the State use a uniform averaging procedure across all schools)?
➢ Does the SEA's methodology result in the identification of not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement?
➢ Does the SEA include the year in which it will first identify these schools for comprehensive support and improvement (*i.e.*, does the timeline comply with the Department's guidance)?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK will use multiple factors to determine the lowest-performing 5 percent of all Title I schools. AK will rank all Title I schools in order, based on the overall index score. If a school has met the measures of interim progress for all subgroups in the school in the academic, graduation rate, and English learner progress indicators, the school would not be selected for Comprehensive Support and Improvement (CSI).AK identifies those schools with the lowest indices that do not meet the state's interim goals a lack of progress of the three previous years.<br><br>AK will use data from the 2017-2018 accountability system to identify schools for CSI for the 2018-2019 school year. |
| *Strengths* | Simple plan for identification.<br><br>Includes all indicators into the index and looks at subgroup performance. The state considers if the school has made progress over three years as well. This guarantees the framework will identify low-performing, "stuck" schools.<br><br>AK will examine not only current status on the accountability model, but also subgroup academic progress, graduation rate, and English learner proficiency. |
| *Weaknesses* | AK is not specific about the "multiple factors" it will use to determine the lowest performing 5% of all Title I schools.<br><br>It is unclear how subgroup performance is considered in the methodology described. While AK states that schools that meet all MIPs for all subgroups will not be identified for CSI (which is rather obvious), it fails to mention subgroup performance in its description of identification of lowest performing 5 percent, stating only that the determination will be made based on a "low overall index" and a lack of progress. |

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| | AK's criteria to not include schools making progress or those meeting interim targets could theoretically result in the identification of less than five percent of Title I schools. |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.vi.b: Comprehensive Support and Improvement Schools—Low Graduation Rates

➢ Does the SEA describe its methodology to identify all public high schools in the State failing to graduate one-third or more of their students for comprehensive support and improvement, including: 1) a description of whether the SEA uses one or more extended-year adjusted cohort graduation rates in addition to the four-year adjusted cohort graduation rate and 2) if applicable, how the SEA averages data (*e.g.*, does the State use a uniform averaging procedure across all schools)?
➢ Does the SEA's methodology result in the identification of all public high schools in the State failing to graduate one-third or more of their students for comprehensive support and improvement?
➢ Does the SEA include the year in which it will first identify these schools for comprehensive support and improvement (*i.e.*, does the timeline comply with the Department's guidance)?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK describes its methodology to identify all public high schools in the State failing to graduate one-third or more of their students for comprehensive support and improvement. The state will identify schools with a four-year rate under 67% starting in 2017-18.<br><br>The timeline for first identifying the schools for CSI is provided. The State will use data from 2017-18 to identify schools for CSI for the 2018-19 school year.<br><br>The State will use the option for very small schools by proposing that a minimum number of 10 students must be included in the cohort for the graduation rate, below which the school would be exempt from differentiation and identification as a comprehensive support and improvement school for graduation rate. |
| *Strengths* | AK's use of only the 4-year ACGR ensures primacy of completion in 4 years.<br><br>AK will exempt cohorts of less than 10 students, as allowed under Sections 8101(23) and 8101(25), in order to protect student privacy and ensure data stability. |
| *Weaknesses* | AK states this methodology for CSI identification will only apply to schools with 12th grade. It is unclear what happens in schools that serve some of the high school grades but not 12th. If students drop out during the 9th, 10th, or 11th grade in these schools, the schools must be held accountable.<br><br>Schools with "special populations" may fall into the "very small schools" |

| | category and escape accountability for graduation. |
|---|---|
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.vi.c: Comprehensive Support and Improvement Schools—Additional Targeted Support Not Exiting Such Status

➢ Does the SEA describe its methodology to identify schools receiving Title I, Part A funds that have received additional targeted support under ESEA section 1111(d)(2)(C) (*i.e.*, based on identification as a school in which the performance of any subgroup of students, on its own, would lead to identification as one of the lowest-performing five percent) that have not satisfied the statewide exit criteria for such schools within a State-determined number of years?
➢ Does the SEA's methodology result in the identification of such schools?
➢ Does the SEA include the year in which it will first identify these schools for comprehensive support and improvement (*i.e.*, does the timeline comply with the Department's guidance)?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK will identify any Title I school previously identified for additional TSI for a subgroup that has not met exit criteria. Schools will be reviewed in the 2020-2021 SY and identified for CSI in the 2021-2022 SY. |
| *Strengths* | |
| *Weaknesses* | |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.vi.d: Frequency of Identification

➢ Does the SEA include the frequency with which the State will identify each type of school for comprehensive support and improvement after the first year of identification?
➢ Does the SEA's timeline result in identification of these schools at least once every three years?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK will identify CSI schools once every three years, beginning in 2018-19 based on 2017-18 data. |
| *Strengths* | Succinct information. |
| *Weaknesses* | |

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| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.vi.e: Targeted Support and Improvement Schools—"Consistently Underperforming" Subgroups

➢ Does the SEA describe its methodology to identify schools with one or more "consistently underperforming" subgroups of students, including its definition of "consistently underperforming"?
➢ Does the SEA's methodology result in the identification of any school with one or more "consistently underperforming" subgroups of students?
➢ Is the methodology based on all indicators in the statewide system of annual meaningful differentiation?
➢ Does the SEA identify these schools annually?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK provides its definition of "consistently underperforming" schools as schools not meeting the state's goals for improvement in every academic indicator for any subgroup over two years and not showing improvement.<br><br>These schools will be identified annually for targeted support and improvement. The first year of identification for targeted support and improvement will be 2019-20 based on the data from 2018-2019. |
| *Strengths* | The state looks at both improvement and low performance, aligning with its comprehensive support model.<br><br>AK will base identification on all indicators on an annual basis. |
| *Weaknesses* | While AK describes its Targeted Support school methodology, all peer reviewers found the proposal to be overly restrictive, as it applies only to schools that fail to meet the state's goals on every indicator for two years and fails to show any progress on any indicator. For example, a school with very low subgroup performance on all indicators except one of the non-academic indicators that is weighted very little will not be identified for support. The methodology will likely result in very few schools being identified for TSI for consistently underperforming subgroup(s). |
| *Did the SEA meet all requirements?* | ☒Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.vi.f: Targeted Support and Improvement Schools—Additional Targeted Support

➢ Does the SEA describe its methodology to identify schools in which the performance of any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State's methodology under ESEA section 1111(c)(4)(D) (*i.e.*, the methodology described above in A.4.vi.a), including: 1) whether the methodology identifies these schools from among all public schools in the State or from among only the schools identified as schools with one or more consistently underperforming subgroups and 2) if applicable, how the SEA averages data (*e.g.*, does the State use a uniform averaging procedure across all schools)?
➢ Does the SEA's methodology result in identification of such schools?
➢ Does the SEA include the year in which the State will first identify such schools (*i.e.*, does the timeline comply with the Department's guidance)?
➢ Does the SEA include the frequency with which the State will identify such schools after the first year of identification?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK describes its methodology to identify schools for additional targeted support. The first year of identification for additional targeted support will be 2018-19, based on 2017-18 data. AK will then identify schools for additional targeted support every three years, on the same cycle as the schools identified for comprehensive support.<br><br>Any schools with subgroups that have lower performance on <u>all indicators</u> than the highest-performing CSI school will be identified. |
| *Strengths* | Using the performance of the highest-performing CSI schools sets a high bar.<br><br>AK considers subgroup performance on all indicators for identification of schools. |
| *Weaknesses* | Requiring a subgroup to have lower performance on ALL indicators will likely lead to few schools being identified for having low-performing subgroup(s).<br><br>AK does not clearly explain how a K-8 school might be compared to a 9-12 school if the 9-12 school is the highest-performing CSI school, as indicators are weighted differently. |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.vi.g: If Applicable, Additional Statewide Categories of Schools

➢ If the State chooses, at its discretion, to include additional statewide categories of schools, does the SEA describe those categories?

| | Peer Response |
|---|---|
| Peer Analysis | Additional categories of schools are described on page 31. They are: <br>• Superior <br>• Satisfactory <br>• Needs Improvement. |
| Strengths | The state provides a status to recognize schools. |
| Weaknesses | |
| Did the SEA meet all requirements? | ☒ Yes (4 peer reviewer(s)) <br> ☐ No (0 peer reviewer(s)) |
| If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement | |

## A.4.vii: Annual Measure of Achievement (ESEA section 1111(c)(4)(E)(iii))

➢ Does the SEA describe how it factors the requirement for 95 percent participation of all students and 95 percent of all students in each subgroup of students in statewide mathematics and reading/language arts assessments into the statewide accountability system?

➢ If applicable, does the SEA describe how the SEA differentiates its approach based on such factors as the number of subgroups in the school missing the participation rate requirement, the length of time over which the school has missed the requirement, or the degree to which the school missed the requirement (*e.g.*, 92 percent participation rate vs. 70 percent participation)?

| | Peer Response |
|---|---|
| Peer Analysis | AK states that it will calculate the percent of students scoring at the proficient or advanced level by dividing the number of students scoring at proficient or advanced by the number of students tested, or 95 percent of the full academic year students enrolled that were eligible to test, whichever is greater. <br><br> It further states that schools must meet the 95% participation rate in the ELA and math assessments for the all students group and for each subgroup to receive a designation of Superior. For satisfactory, the school must have a 95% participation rate for all students. <br><br> AK requires schools that miss the 95% participation rate for the "all students" group or any subgroup for 2 consecutive years to create and submit an improvement plan to the district. The district must review and approve the plans for each school. <br><br> AK expects districts to communicate with parents and teachers and to provide encouragement to students to participate in assessment. |
| Strengths | AK will not recognize schools as Superior that miss the rate for all students or any student group. For schools missing the rate two years in a row the school must submit a plan. <br><br> AK will require specifics in an improvement plan including teacher training on |

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| | the importance of test participation. These requirements will help prevent students (and parents) being "counseled out" of test participation. |
| *Weaknesses* | No detailed discussion about differentiated approach based on factors such as the number of subgroups in the school missing the participation rate requirement, or the degree to which the school missed the requirement.<br><br>According to the State's calculation, it is possible for a school to receive the designation of "satisfactory" even if there is zero participation from one single subgroup, as long as the "all students" group has a 95% participation rate. This disadvantages subgroups with relatively smaller student populations.<br><br>The State provides no specific information about the improvement plan, its components, the process schools will follow; the approval and monitoring processes, or consequences for not meeting the goals of the improvement plan.<br><br>Only the Superior designation includes a requirement that at least 95% of all students AND all student subgroups participation in state assessments. |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

## A.4.viii: Continued Support for School and Local Educational Agency Improvement (ESEA Section 1111(d)(3)(A))

A.4.viii.a: Exit Criteria for Comprehensive Support and Improvement Schools (ESEA section 1111(d)(3)(A)(i)(I))

➤ Does the SEA describe its statewide exit criteria for schools identified for comprehensive support and improvement, which may include how the exit criteria are aligned with the State's long-term goals and measurements of interim progress?
➤ Does the SEA's description include the number of years within which schools are expected to meet such criteria?
➤ Is the number of years no more than four years?
➤ Do the exit criteria ensure continued progress to improve student academic achievement and school success in the State (*e.g.*, do the exit criteria improve student outcomes and ensure that a school that exits no longer meets the criteria under which the school was identified)?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK states it will review the performance of the schools identified for comprehensive support 3 years after the initial identification.<br><br>AK states that schools identified for comprehensive support and improvement based on the lowest performing 5% of Title I schools must perform at least one level higher in each indicator than it performed upon initial identification to exit the group. |

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| | For high schools identified for comprehensive support and improvement based on a four-year adjusted cohort graduation rate of less than 67%, the school must have improved the graduation rate to greater than 67%. |
| *Strengths* | The exit criteria ensure improvement and not just relative to other schools.<br><br>AK recognizes growth of a school as a requirement to exit CSI status. |
| *Weaknesses* | The State's explanation does not include a description of how the exit criteria are aligned with the State's long-term goals and measurements of interim progress.<br><br>Based on the criteria outlined by AK, a school could meet the exit criteria even if it is still in the lowest 5% of the Title I schools based on the data at the end of three years, or if a high school improved the graduation rate as little as 1% (as long as it is greater than 67%). The reviewer is not confident that the exit criteria are rigorous enough to ensure continued progress to improve student academic achievement and school success in the State.<br><br>Schools are only evaluated for exit every three years. It may be worth considering evaluating sooner in the cases of turnaround.<br><br>It is unclear the years upon which the requirement for improved performance will be based or averaged.<br><br>AK could have CSI schools identified after three years that have higher performance than other schools that are exiting CSI status due to growth, causing some confusion with communication. |
| *Did the SEA meet all requirements?* | ☐ Yes (0 peer reviewer(s))<br>☒ No (4 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | AK must ensure that a school that exits no longer meets the criteria under which the school was identified and include a description of how the exit criteria are aligned with the State's long-term goals and measurements of interim progress. AK must describe how one level of improvement across three years demonstrates continued progress. |

A.4.viii.b: Exit Criteria for Schools Receiving Additional Targeted Support (ESEA section 1111(d)(3)(A)(i)(II))

➢ Does the SEA describe its statewide exit criteria for schools receiving additional targeted support under ESEA section 1111(d)(2)(C), which may include how the exit criteria align with the State's long-term goals and measurements of interim progress and the requirement that the goals and measurements of interim progress take into account the improvement necessary to close statewide proficiency and graduation rate gaps?
➢ Does the SEA's description include the number of years within which schools are expected to meet such criteria?
➢ Do the exit criteria ensure continued progress to improve student academic achievement and school success in the State (*e.g.*, do the exit criteria improve student outcomes for the subgroup or subgroups that led to the school's identification and ensure that a school that exits no longer meets the criteria under which the school was identified)?

|  | *Peer Response* |
|---|---|
| *Peer Analysis* | AK states it will review the performance of the schools identified for additional targeted support three years after the initial identification.<br><br>AK states that, for a school to meet the exit criteria, the performance of the subgroup for which the school was identified must have improved at least one level from the level of performance at which the school was initially identified for each indicator in the accountability system. |
| *Strengths* | AK uses a criterion referenced approach that ensures improvement.<br><br>AK is considering specific subgroup improvement on each indicator as criteria for exiting additional TSI status. |
| *Weaknesses* | AK's explanation does not include a description of how the exit criteria are aligned with the State's long-term goals and measurements of interim progress.<br><br>It is unclear that the exit criteria are rigorous enough to ensure continued progress to improve student academic achievement and school success in the State.<br><br>It is unclear the years upon which the requirement for improved performance will be based or averaged.<br><br>The "levels" of performance have not been determined (based on designation listing on page 31); therefore the performance required for exiting TSI is unknown.<br><br>Exit criteria should include a requirement that the school have NO subgroup that would qualify it for additional TSI. In other words, requiring improvement of the subgroup that resulted in initial identification without consideration of all subgroups defeats the purpose. |
| *Did the SEA meet all requirements?* | ☐ Yes (0 peer reviewer(s))<br>☒ No (4 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | AK must describe how the exit criteria are aligned with the State's long-term goals and measurements of interim progress.<br><br>AK must ensure the exit criteria result in continued progress to improve student academic achievement and school success in the State. |

A.4.viii.c: More Rigorous Interventions (ESEA section 1111(d)(3)(A)(i)(I))

➤ Does the SEA describe the more rigorous State-determined action required for schools identified for comprehensive support and improvement that fail to meet the SEA's exit criteria within a State-determined number of years, which may include interventions that address school-level operations, such as changes in school staffing and budgeting or the school day and year?

| | Peer Response |
|---|---|
| Peer Analysis | AK mentions an "existing system of differentiated support and oversight of struggling schools," along with facilitated collaboration and engagement among stakeholders.<br><br>AK will work collaboratively to provide more rigorous interventions, including a planning and support team to recommend actions such as a review of student achievement data, resource allocation audit, on-site evaluation of school improvement practices and off-site improvement work sessions, DEED-directed strategic plan revisions, focused training, use of school improvement coaches, direction of school improvement and other funds, and replacement of teachers and principals; more rigorous interventions are initiated after three years as a CSI school. |
| Strengths | More rigorous interventions and differentiated support described are progressive, sufficient, and appropriate.<br><br>State statue exists to support their more rigorous actions.<br><br>AK is taking a collaborative approach, in which the SEA directs the work, but many of the activities must occur at the local level with support of the planning and support team. |
| Weaknesses | Depending on the number of schools failing to exit CSI status after three years, resources may be stretched to provide described supports to all CSI schools. |
| Did the SEA meet all requirements? | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement | |

A.4.viii.d: Resource Allocation Review (ESEA section 1111(d)(3)(A)(ii))

➢ Does the SEA describe how it will periodically review resource allocation to support school improvement in each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement?

| | Peer Response |
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| Peer Analysis | AK states that for districts serving a significant number or percentage of CSI or TSI schools failing to make progress, an inter-departmental review will be conducted on an annual basis to ensure alignment of resources coming from various sources. This comprehensive review of the districts' and schools' budgets is made available for public feedback.<br><br>All schools must work with their district to submit a budget with a focus on professional development and instructional improvement. For those districts with lots of comprehensive or targeted support schools, the state will review |

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| | resource allocation for all funds with a focus on resource alignment to goals. |
| *Strengths* | The description of how AK will periodically review resource allocation to support school improvement in each LEA serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement is sufficient, clear, and effective. |
| | AK provides a process to review all school budgets. |
| | AK will require school improvement budgets to align with goals reviewed by both the district and the state. |
| *Weaknesses* | |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.viii.e: Technical Assistance (ESEA section 1111(d)(3)(A)(iii))

➢ Does the SEA describe the technical assistance that it will provide to each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement?

➢ Is the technical assistance likely to improve student outcomes by, for example, 1) identifying State-approved evidence-based interventions; 2) supporting LEAs and schools in the development and implementation of support and improvement plans; and 3) differentiating the technical assistance?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK describes the technical assistance that it will provide to each LEA serving a significant number of schools identified for comprehensive or targeted support and improvement. The activities described are likely to improve student outcomes as they are well directed, evidence-based and grounded in a theory of action. The clear theory of action makes it easy for the state to evaluate their work in this area and adjust as needed.<br><br>AK focuses on increasing district capacity to improve student outcomes. |
| *Strengths* | AK's theory of action, along with Alaska's Effective Schools Framework (which reinforces an evidence-based instructional focus through emphasis on/support of 12 key indicators), and the identified desired attributes of districts.<br><br>AK will provide technical assistance through a tiered system of support related to school improvement planning as well as training and technical assistance on evidence-based interventions, coaching support, webinar support, and collaborative use of diverse resources.<br><br>AK is making a strong commitment to professional development as part of its theory of action. |
| *Weaknesses* | |

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| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s)) <br> ☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.viii.f: If Applicable, Additional Optional Action

➢ If applicable, does the SEA describe the action that it will take to initiate additional improvement in any LEA with a significant number or percentage of schools that it consistently identifies for comprehensive support and improvement and are not meeting the State's exit criteria or in any LEA with a significant number or percentage of schools implementing targeted support and improvement plans?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | Not Applicable |
| *Strengths* | |
| *Weaknesses* | |
| *Did the SEA meet all requirements?* | ☐ Yes (# peer reviewer(s)) <br> ☐ No (# peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

## A.5: Disproportionate Rates of Access to Educators (ESEA section 1111(g)(1)(B))

➢ Does the SEA describe the extent, if any, that low-income children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers?

➢ Does the SEA describe the extent, if any, that minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers?

- Does the SEA describe the measures (*e.g.*, data used to calculate the disproportionate rates) that it will use to evaluate and publicly report its progress with respect to how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers?[4]

|  | *Peer Response* |
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| *Peer Analysis* | AK provides clear definitions, data, and a plan with a theory of action on how to address the inequitable access some students have to inexperienced and ineffective teachers. The state provides lots of data on this issue and captures the extent of the problem at the state level nicely. <br><br> AK describes its strategies to address root causes and eliminate equity gaps and theory of action that it will use to evaluate progress and address disproportionate rates of access to educators for low-income and minority children enrolled in schools assisted under Title I, Part A (pages 48-53). <br><br> Based on 2015 data, low-income students and minority students are more likely to be placed with first-year teachers or teachers who are out-of-field; AK has a new definition of "ineffective" teachers, and data is not included for disproportionate rates of students being taught by an "ineffective" teacher; AK will report rates in the highest and lowest quartile schools for each of the categories of teachers. <br><br> The State specifies that rates will be calculated as the percent of teachers in each category in the schools in the highest and lowest quartiles statewide for low-income and minority students. The percent of Title I schools in each quartile will also be reported. |
| *Strengths* | AK provides very thoughtful definitions and context for terms used to determine disproportionate rates of access to educators for low-income and minority children. <br><br> AK's plan and strategies for talent management and equity are thorough and feasible. <br><br> The state includes an example table for how they will report on this data. <br><br> AK activities are robust and comprehensive. <br><br> AK has clear data on disproportionate service by out-of-field and inexperienced teachers. |
| *Weaknesses* | AK does not provide current data on disproportionate service by ineffective teachers. |

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[4] Consistent with ESEA section 1111(g)(1)(B), this description should not be construed as requiring a State to develop or implement a teacher, principal or other school leader evaluation system.

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| | AK does not provide student level data that allows for calculating within school access issues. |
| *Did the SEA meet all requirements?* | ☐ Yes (0 peer reviewer(s)) <br> ☒ No (4 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | AK must provide the extent that low-income and minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective educators. <br><br> AK must clarify if the data pertains to all schools or Title I schools. |

## A.6: School Conditions (ESEA Section 1111(g)(1)(C))

➢ Does the SEA describe how it will support LEAs receiving assistance under Title I, Part A to improve school conditions for student learning?
➢ Does the SEA's description include how it will support LEAs to reduce incidences of bullying and harassment?
➢ Does the SEA's description include how it will support LEAs to reduce the overuse of discipline practices that remove students from the classroom?
➢ Does the SEA's description include how it will support LEAs to reduce the use of aversive behavioral interventions that compromise student health and safety?

| | *Peer Response* |
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| *Peer Analysis* | This section is organized in a clear and coherent manner. The state cites state laws that deal with each issue and the data sources associated with them. They also describe the trainings they offer in these areas. The descriptions are compelling. <br><br> AK offers technical assistance and training annually to districts on bullying, harassment, and intimidation; additionally, AK law requires disciplinary and safety policies as well as reporting of incidences of bullying or intimidation; DEED collects data to analyze disproportionality in discipline practices among student populations and offers ongoing technical assistance to districts regarding aversive behavioral interventions. |
| *Strengths* | The state has a clear understanding of how school conditions affect student learning and has included an exhaustive description of supports that are currently available for schools and districts. It is clear from the plan that the State has a strong commitment to holding schools accountable for out-of-school and exclusionary discipline. <br><br> AK efforts regarding overuse of discipline practices include a new data collection system to capture disciplinary actions which provides for the use of data in determining if disproportionality in discipline is occurring in any student subpopulations and development of in-depth Trauma Sensitive Schools training with a focus on building educator understanding that students' challenging behaviors are often the expression of trauma and grief. |
| *Weaknesses* | |
| *Did the SEA meet* | ☒ Yes (4 peer reviewer(s)) |

| *all requirements?* | ☐ No (0 peer reviewer(s)) |
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| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

## A.7: School Transitions (ESEA 1111(g)(1)(D))

➢ Does the SEA describe how it will support LEAs receiving assistance under Title I, Part A in meeting the needs of students at all levels of schooling (particularly students in the middle grades and high school)?

➢ Does the SEA's description include how it will work with LEAs to provide effective transitions of students to middle grades and high school to decrease the risk of students dropping out?

| | *Peer Response* |
|---|---|
| *Peer Analysis* | AK provides information on several ways it supports LEAs in meeting needs of students in school transitions and how it works with LEAs to provide effective transitions to middle and high school to decrease risk of dropping out<br><br>AK is proposing support for districts from across offices at DEED, including transitions from early childhood to elementary, elementary to middle, and middle to high schools; AK offers the Alaska Performance Scholarship to provide an opportunity for students to attend college who might not otherwise be able to afford the cost of attendance. |
| *Strengths* | The state provides alternative environments to offer a safety net to students close to dropping out. |
| *Weaknesses* | AK does not describe specifically how it will support LEAs receiving assistance under Title I, Part A in meeting the needs of students at all levels of schooling, and particularly students in the middle grades and high school. AK's description does not include how it will work with LEAs to provide effective transitions of students to middle grades and high school to decrease the risk of students dropping out. |
| *Did the SEA meet all requirements?* | ☒Yes (3 peer reviewer(s))<br>☒No (1 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | AK must include a more robust plan about how it will work with LEAs to provide effective transitions of students to middle grades and high school to decrease the risk of students dropping out. |

# SECTION E: TITLE III, PART A, SUBPART 1: ENGLISH LANGUAGE ACQUISITION AND ENHANCEMENT

## E.1: Entrance and Exit Procedures (ESEA section 3113(b)(2))

- ➢ Does the SEA describe how it will establish and implement, with timely and meaningful consultation with LEAs representing the geographic diversity of the State, standardized statewide entrance and exit procedures for English learners, including a description of how, if applicable, a State will ensure that local input included in the exit procedures, such as teacher input or a portfolio, will be applied statewide?
- ➢ Does the SEA's description include an assurance that all students who may be English learners are assessed for such status within 30 days of enrollment in a school in the State?

| | Peer Response |
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| *Peer Analysis* | AK has clearly defined entrance and exit procedures for EL programs that include a 30-day timeline at the beginning of the school year. |
| *Strengths* | AK does consider teacher observations as a part of the identification process to be implemented statewide. |
| *Weaknesses* | While entrance procedures are grounded in AK regulations, AK provides no evidence of timely or meaningful consultation in the development of these procedures is provided.<br><br>The 30-day timeline as described in the AK plan only addresses screening of students who enroll at the beginning of the school year; this timeline is unclear for students who enroll mid-year. |
| *Did the SEA meet all requirements?* | ☐ Yes (0 peer reviewer(s))<br>☒ No (4 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | AK must describe stakeholder engagement on entrance and exit procedures. They also must include a thirty day assurance for all students not just those enrolling at the start of the year. |

## E.2: SEA Support for English Learner Progress (ESEA section 3113(b)(6))

- ➢ Does the SEA describe how it will assist eligible entities in meeting the State-designed long-term goal for English language proficiency established under ESEA section 1111(c)(4)(A)(ii), including measurements of interim progress towards meeting such goal, based on the State's English language proficiency assessment under ESEA section 1111(b)(2)(G)?
- ➢ Does the SEA describe how it will assist eligible entities in helping to ensure that English learners meet challenging State academic standards?

| | Peer Response |
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| *Peer Analysis* | AK states that it offers training opportunities to Title III districts annually. The State also provides guidance to schools regarding English learners for the administration of the Alaska Developmental Profile (ADP), Alaska's Kindergarten Readiness tool.<br><br>AK provides technical assistance and support on the EL standards, as well as professional development to support English learner instruction in both English and general academics; AK uses WIDA Consortium materials and resources, working with Title III districts to co-sponsor events and host events for other districts; further AK is developing activities to build family |

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| | engagement in EL families. |
| *Strengths* | AK notes that it will develop strategies to provide guidance to LEAs on how to target and provide inclusive family involvement to meet the needs of EL students. Strategies could include building family engagement in screening and assessment tools, and development of activities that are geared towards meeting the needs of families.<br><br>AK is working to multiply efforts by co-sponsoring professional development with Title III districts. |
| *Weaknesses* | It is not clear how these initiatives will ensure that English learners meet challenging State academic standards. Little information about how the AK will actually assist LEAs is provided. |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

## E.3: Monitoring and Technical Assistance (ESEA section 3113(b)(8))

➢ Does the SEA describe how it will monitor the progress of each eligible entity receiving a Title III, Part A subgrant in helping English learners achieve English language proficiency?

➢ Does the SEA describe the steps it will take to further assist eligible entities if the strategies funded under Title III, Part A are not effective, such as by providing technical assistance and support on how to modify such strategies?

| | *Peer Response* |
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| *Peer Analysis* | The state will monitor LEAs by looking at district data and reviewing all district plans. The state plans to focus on early ELs. If the strategies prove ineffective the district will receive technical assistance and may be required to change resource allocation.<br><br>AK reviews grant applications as well as district and school data to determine progress; additionally, AK recommends policies that promote best practices for meeting the needs of ELs; other supports include newsletters, webinars, guidance documents, focused technical assistance, and building collaboration among districts with similar programs; AK also is coordinating EL supports with early childhood providers such as Head Start. |
| *Strengths* | AK is working to provide support from the state and to facilitate cross-LEA efforts to improve EL student outcomes, including early learners. |
| *Weaknesses* | AK does not provide a thorough description of the steps it will take to further assist eligible entities if the strategies funded under Title III, Part A are not effective. |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewer(s))<br>☐No (0 peer reviewer(s)) |

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|---|---|
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |