

STATE PLAN
PEER REVIEW CRITERIA
Peer Review Panel Notes Template

STATE: California



U.S. Department of Education

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)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	NA: CA does not require end-of-course exams in high school and, thus, does not seek the 8 th grade math exception. P13
<i>Strengths</i>	N/A
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input type="checkbox"/> No (0 peer reviewers) <input checked="" type="checkbox"/> N/A (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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).

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE provides a definition of languages present to a significant extent as “any native language other than English spoken by 15 percent or more of the [K-12] student population” consistent with the California Education Code 48585.</p> <p>Spanish is identified based on the definition citing 33.5 percent of all students and 83.4 percent of ELs in 2015-16 were Spanish speakers, the most populous language other than English. The next most common language – not identified – comprised 2.2 percent of the EL population.</p> <p>CDE’s determination of languages present to a significant extent does NOT take special consideration of students’ birth country, Native American status, or migratory status; however, these students’ language needs would be captured by CA’s definition.</p> <p>CDE’s definition of languages present to a significant extent cites a statewide analysis; there is no evidence CDE makes additional supports available in grades where more than 15% of students speak a common language other than English. P14</p>
<i>Strengths</i>	<p>Statistics are clear regarding languages present to a significant extent at the state level.</p> <p>CDE delineates the dominant languages by district, but not by grade spans. Although less than 15% of students may share a dominant language other than English statewide, select grades may enroll higher proportions of students who could benefit from language accommodations other than Spanish. P14</p> <p>The submission includes links to relevant documents including legislation and language data both statewide and by Districts and Schools by County Office Service Regions.</p>

<i>Weaknesses</i>	<p>CDE’s determination of languages present to a significant extent does NOT take special consideration of students’ birth country, Native American status, or migratory status; however, these students’ language needs would be captured by CA’s definition.</p> <p>CDE’s definition of languages present to a significant extent did not take into account grade spans where more than 15% of students speak a common language other than English. P14</p> <p>While the State meets these criteria, there is concern that, given the size and diversity of the State, large concentrations of English learners could be excluded from instructional services and accountability systems at the district level. P13-14</p> <p>While CDE has identified the most populous language other than English as Spanish, the State could have strengthened the plan with a discussion of 16.6 percent non-Spanish speakers in the English learner group. California enrolls approximately seven million students P2, therefore even small percentages of students could yield large numbers of English learners that may not have adequate access to instruction or assessment supports. Furthermore, a quick examination of the Language Data for Districts and Schools provided as a link shows large concentrations of English learners within LEAs. For example, Orange county has schools that enroll a significant number of students who speak Vietnamese (although EL status is not provided). Statewide the 15 percent threshold makes sense, but clearly, there are schools that meet this threshold within districts that could exclude large numbers of English learners. http://dq.cde.ca.gov/dataquest/lc/SchLang15.aspx?cYear=2016-17&LC=02&Language=Vietnamese.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>While CDE has most of the EL population covered, they must describe how they considered the dominant languages by grade spans.</p> <p>CDE must make the determination of languages present to a significant extent taking into consideration of students’ birth country, Native American status, or migratory status.</p>

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?

<i>Peer Response</i>	
<i>Peer Analysis</i>	<p>CDE state assessments are available in English only for ELA and available in stacked translations in Spanish for math in all grades, 3-8 and 11 as part of the Smarter Balanced consortium. Nearly 33.5% of the student population’s dominant language is Spanish.</p>

	CDE also provides glossaries in 10 languages and instructions in 17 languages. CDE provides as supports and accommodations used in daily instruction, including language translations, for alternate assessment takers. P14
<i>Strengths</i>	<p>CDE provides stacked translations on the California Assessment of Student Performance and Progress (CASPP) Smarter Balanced in mathematics in grades 3-8 and 11. P14</p> <p>CDE has other mechanisms in place to assist English learners; i.e. glossaries, dictionaries, and translated directions for this assessment in 17 languages.</p> <p>Supports will be available for English Learners for science assessments that are being developed for 2018-19 and math assessments, as well as translated test directions for language arts and math items.</p> <p>State employs the materials available through its assessment consortium.</p>
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE identifies a need for developing stacked translations in Spanish for the California Science Test (CAST).</p> <p>CDE identifies the need to develop a Spanish reading/language arts assessment, the California Spanish Assessment (CSA) to measure competency in Spanish language arts in grades 3-8 and HS. It is unclear from the narrative if CDE intends the CSA as an additional assessment or as a replacement for the CAASPP English languages arts/literacy assessment for native Spanish speaking students.</p>
<i>Strengths</i>	<p>CDE identified two assessments that are needed for Spanish-speaking students: the California Science Test (CAST) and the California Spanish Assessment (CSA). The CSA will assess competency and literacy in Spanish and can lead to a State Seal of Biliteracy.</p> <p>CDE has multiple mechanisms in place to assist English learners; i.e. glossaries, dictionaries, and translations.</p>
<i>Weaknesses</i>	While CDE has demonstrated substantial support for Spanish translations and native language glossaries and translations in multiple languages, no

	instructional rationale has been provided for these translations to demonstrate alignment with daily activity except for student accommodations and supports for alternate assessments.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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:
 - 1) gather meaningful input on the need for assessments in languages other than English;
 - 2) collect and respond to public comment; and
 - 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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE does not meet all the requirements in this section.</p> <p>CDE’s plan provides a timeline with limited narrative to explain every effort to develop assessments given the key accessibility feature relies on teachers to translate directions and test items into the language of instruction. P15</p> <p>CDE does not describe if or how assessments in languages other than Spanish would be developed. P15</p> <p>CDE conducted in-person region meetings, and hosts ongoing meetings, with a variety of stakeholders (educators, parents, and community members) to discuss native language assessments, specifically for the science assessment. P16</p> <p>CDE indicated that the California Spanish Assessment was not available, but needed. The plan did not provide a timeline for developing and implementing this assessment.</p>

<i>Strengths</i>	<p>While California has put a lot of effort into developing its next generation assessments and has moved to the Smarter Balanced assessment. CDE has developed translations, supports which are varied and are specifically focused on Spanish, embedded designated supports for ELs via a math glossary and stacked translations. Test directions and non-embedded supports include glossaries and reader directions for science, read aloud and translations glossary for math, as well as test directions for ELA and math.</p> <p>CDE has made, and continues to make, a strong effort to include a wide variety of stakeholders.</p>
<i>Weaknesses</i>	<p>The plan did not provide a timeline for developing and administrating the California Spanish Assessment (CSA). CDE may not have to address it because it is a voluntary assessment, however, the State indicated it “was not available” in the previous section and therefore should have presented an implementation timeline.</p> <p>CDE’s plan could be strengthened by providing additional detail describing the specific engagement opportunities (membership, frequency, mode, duration, activities, agendas, etc.) provided to English learner teachers, parents, students, advisory groups in the English learner community, what experts and practitioners advised, and how information was collected from stakeholders would be incorporated into non-English assessments. Other than this report, it does not appear that there are ongoing policy groups and discussions about non-English assessments, which is disconcerting in a State with such a large English learner population.</p> <p>For science, CDE proposes to allow teachers to translate the directions and test items into the language of instruction. The variability of translation of directions and the translation of items, and well as the variability in the translations, will compromise the validity and reliability of the science assessment.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The State must provide a timeline for implementing the CSA since the State indicated it was a necessary but unavailable assessment.</p> <p>CDE must explain their process for ensuring consistency in translation of the science assessment directions and items to ensure validity, reliability and comparability of results.</p>

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?

	<i>Peer Response</i>
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<i>Peer Analysis</i>	CDE lists the eight racial/ethnic groups that will be reported for long-term and interim goals. The following groups are included: Black or African American, Asian, Filipino, Hispanic or Latino, Native Hawaiian or Pacific Islander, American Indian or Alaska Native, Two or More Races, and White. P16
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	CDE includes foster youth and homeless children and youth. P17
<i>Strengths</i>	CDE is including two additional subgroups -students in foster care or who are homeless- in its statewide accountability system.
<i>Weaknesses</i>	CDE did not define migrant students as a subgroup. Approximately one-third of students who are eligible for migrant education program services reside in California. Migrant students face multiple barriers to educational access and success; focusing on this group could promote improved academic outcomes.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>NA: CA is applying the exception under ESEA section 1111(b)(3)(A)(i) to a recently arrived English learner.</p> <p>Recently arrived ELs in California will be excluded from one administration of the ELA state assessment and will exclude results on any of the assessments for the first year of the English learner's enrollment for the purposes of the state determined school accountability.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input type="checkbox"/> No (0 peer reviewers) <input checked="" type="checkbox"/> N/A (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	CDE has selected a minimum N-size of 30 students for accountability of a school and all student groups. P17
<i>Strengths</i>	A minimum N size of 30 should uphold the spirit of transparency and accountability.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that</i>	

<i>an SEA must provide to fully meet this requirement</i>	
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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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE’s selected minimum N-size is defensible citing several research studies by various authors on mean, range, standard deviation and even distribution. P17-18</p> <p>CDE did not provide any analysis demonstrating the soundness of 30 as the minimum N nor did the narrative demonstrate that other minimum N sizes were considered in the decision-making progress.</p> <p>It is unclear if the selected N-size is appropriate for CDE’s selected indicators in its accountability system. No data are available on whether this N-size yields valid and/or reliable data for either reporting or accountability purposes.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The narrative cited research was used and that the stakeholder groups were involved, but there was no discussion of how or what statistical principles were applied when making the decision for the minimum N-size of 30. CDE did not provide evidence that an N-size of 30 is statistically sound relative to their chosen indicators.</p> <p>CDE should use and reference the best practices established by the Institute of Education Sciences congressionally mandated report “Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information,” published in January 2017 to guide and support the decision process in selecting the minimum N-size.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that</i>	CDE must provide detail on how the research relates to California’s decision for a minimum N-size of 30, provide documentation on the statistical soundness of this N-size as it relates to the accountability indicators, and how

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 Protecting Personally Identifiable Student Information](#)” to identify appropriate statistical disclosure limitation strategies for protecting student privacy.

<i>an SEA must provide to fully meet this requirement</i>	(or an analysis of) other minimum N-sizes that were considered but resulted in the selection of 30.
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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?
- Does the description include how the State collaborated with teachers, principals, other school leaders, parents, and other stakeholders when determining such minimum number?

	<i>Peer Response</i>
<i>Peer Analysis</i>	In addition to cited research for statistical soundness, the minimum N size was selected based on public comment via meetings, surveys, and written feedback via email and letters from teachers, principals, parents, advocacy groups, public and is consistent with CA Education Code section 52052. As added assurance, the CDE’s Technical Design Group (their expert advisory group) was consulted and they concurred that an N-size of 30 was valid and reliable. P18
<i>Strengths</i>	
<i>Weaknesses</i>	<p>CDE provides no data to support the selection of this N-size in the plan narrative. While data may have been provided to stakeholders to support the selection of this N-size in, there is no indication in the narrative to this effect. Policymakers and stakeholders should have considered data on what percentage of students an N-size of 30 includes or excludes, validity, and the reliability of the data from year to year, compared to other N sizes. This analysis would help confirm the minimum N size of 30 is the best decision for inclusion, validity, and reliability</p> <p>The plan could be strengthened by citing the date this work was done. If it was in the last couple of years, the analysis likely still holds and by listing members of the technical work group and their qualifications.</p> <p>It is not clearly stated that the public supported the selection of 30 after the proposal was made.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	CDE must provide documentation as to why this decision was made; i.e. technical analysis, research/literature, Technical Design Group meetings notes, stakeholder feedback, etc.

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE indicates that it historically has not reported on student subgroups with less than 11 students. However, it did not provide reasoning or research on which it based this decision. Greater detail is required to make a determination on whether the State met this requirement. P18</p> <p>CA also states that ‘for report purposes only’ that the state provides “Status/Change” data for student groups with 11-29 students in the group. It is unclear what reporting of “status/change” data includes and what is reported for student groups with 11-29 students. P18</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>CDE should use and reference the best practices established by the Institute of Education Sciences congressionally mandated report “Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information,” published in January 2017 to guide and support the decision process in selecting the minimum N-size.</p> <p>CDE indicates that it historically has not reported on subgroups with less than 11 students, it does not discuss why it believes this number protects student privacy. Without the rationale, it cannot be determined whether this number is large enough to protect student privacy, particularly since CDE has selected an N-size of 30 for the accountability system.</p> <p>CDE does not explain which “Status/Change” data is reported and how it is reported differently than for groups of 11-29 compared to groups of 30 or more.</p> <p>CDE does not cite a process for suppression for publicly reported student data where values are 0 or 100 percent. CDE should explain suppression rules that are/not applied for all or none situations for student groups.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (3 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must</i>	<p>The State must provide detail on how it determined that reporting on less than 11 students protects student privacy.</p> <p>CDE must explain the “Status/Change” data that is reported for groups of 11-</p>

³ See footnote 5 above for further guidance.

<i>provide to fully meet this requirement</i>	29 compared to groups of 30 or more. CDE must explain if and how suppression rules are used for student groups with 0 or 100 percent meeting indicator or goal requirements.
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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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	CDE proposes a minimum N-size of 11 for reporting, this is different than the accountability minimum N-size of 30. P18
<i>Strengths</i>	
<i>Weaknesses</i>	CDE does not focus on student privacy or provide specific evidence of statistical reliability. CDE could use and reference the best practices established by the Institute of Education Sciences congressionally mandated report “Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information,” published in January 2017 to guide and support the decision process in selecting the minimum N-size.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	CDE must explain how the minimum N-size of 11 is statistically sound and does not provide identifiable information.

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE identified long-term academic achievement goals in terms of the school’s ‘performance colors’ separately for ELA and math. The performance color based upon a combined measure of the average distance each student score, averaged at the school level, from the floor of grade-level proficiency status and the change in that value over the prior year. P20</p> <p>Long-term academic achievement goals can be <u>met</u> in multiple combinations of Status and Change. P20-21</p> <p>The proposed long-term academic achievement goals do not include HS/grade 11 assessments. P22 In 2018-19, CA will create performance levels for the College/Career Indicator, which will include grade 11 ELA and math results, AP, IB, Dual enrollment, a-g completion with C or better, and is proposed for use in the academic achievement indicator. California School, Dashboard Technical Guide 2016-17 School Year. P52-53</p> <p>Only schools and subgroups with at least two years of data are included in the academic achievement goals measure as Change requires at least two years of data to demonstrate impact from one year to the next. California School, Dashboard Technical Guide 2016-17 School Year. P8</p> <p>The goals for measuring improved academic achievement, as measured by grade level proficiency, is a requirement for the state plan. CDE could include additional goals using the combined measure of Status and Change as an innovative and welcome addition to goal setting.</p> <p>CDE expects all students and subgroups to achieve Blue or a Green with High Status and Increased or Significantly Increased Change or Very High Status with Declined Change. The CA SBE has set a seven-year timeline line for schools to reach the academic achievement goals, but expects to revise the performance level every seven years and have an annual review process, which is not described in this narrative section. P20</p> <p>Baseline data for academic achievement goals is provided by subgroup for the number and percent of schools that would be rated for each performance color. No data is provided on the actual values for status or change. P23-24</p> <p>CDE includes a timeline of seven years in which long-term goals are to be met; regrettably, the narrative states that after seven years the performance levels will just be reset reducing the ambitiousness of the goals. P20</p> <p>Given the esoteric approach to long-term academic achievement goals for academic achievement, it is not possible to determine if the long-term goals are ambitious. However notable is that to earn a High Status rating, schools just need to be within five points, on average, of the floor of proficiency, which not only lowers the expectation of grade level proficiency by five points, but also the averaging allows for masking otherwise obvious achievement gaps within the school and subgroups. Additionally, a Very High Status rating with a Declined from the prior year also meets the goal. Schools</p>

	<p>with a declining trend are not meeting ambitious expectations.</p> <p>State does not provide in this section a precise value or range of values for “Standard Met” The link provided may well define “met standard,” or “status,” but it would be quite simple to “provide a numeric measure.” Assuming the Smarter Balanced performance level of “Standard Met” is a valid measure of grade level proficiency, the state provides compliant long-term goals for all schools, all students, and each subgroup.</p> <p>All students and groups have the same overall goal.</p>
<i>Strengths</i>	<p>CDE is providing a color-code dashboard that gives a snapshot of school and district progress on key indicators. While these are easy to understand, there is a risk of stigmatizing students in the lower-rated schools, especially if they have do not have school choice.</p> <p>ELA and math are computed separately.</p> <p>Value tables and associated labels are well thought out. The detailed explanation is sufficient to overcome the missing “lowest possible score.”</p>
<i>Weaknesses</i>	<p>Data provided on pages 20 and 21 are based on 7,157 schools, however California has over 10,000 schools, this should be explained. Stakeholders do not see the data that support the color ratings in a clear and concise presentation, nor can they see the long-term or interim goals the district would need to meet over the 7-year timeline.</p> <p>CDE could improve the dashboard in two areas to show progress (interim and long-term) in meeting the standard. First, for each indicator it would be helpful to show the color rating for the current and previous year so that the user would have a quick overview of progress. The technical guide indicates that the academic indicator is only for grades 3-8 and that the grade 11 assessment data will be in a College/Career Indicator (P44, technical report). It is not clear how CDE will construct this indicator.</p> <p>There is concern about a school/subgroup being labeled “high” or “blue” if scores declined. There may be sound reasoning for this, but CDE did not discuss it.</p> <p>CDE set a 7-year timeline for schools and student groups to reach their goals, but does not discuss how it reached this decision.</p> <p>CDE did not identify and describe long-term goals for all students for improved academic achievement specifically towards meeting grade-level proficiency, but rather included a measure of improvement.</p> <p>High school ELA and math are not included.</p> <p>Averaging distance from the floor of proficiency allows for otherwise obvious achievement gaps within the school and subgroups only on growth makes it possible to mask lack of academic achievement.</p>

	<p>An explicit timeline for achieving the long-term academic achievement goals is not provided and no detail is provided about what happens after the seven-year timeframe or why/how performance levels are revised.</p> <p>The goals do not capture academic achievement as measured by grade level proficiency. Even if allowed to measure academic achievement by distance from proficiency and improvement, the goals and colors are not meaningful to parents, educators, policymakers, or the public.</p> <p>The expectations for High Status and the allowable Declined Change does not equate to ambitious goals.</p> <p>Status performance labels are defined as a specific range of points related to an unspecified cut score, “the lowest possible scale score to achieve Level 3 (Standard Met).” This section of the plan would be more straightforward with a set of score ranges for the performance levels.</p>
<p><i>Did the SEA meet all requirements?</i></p>	<p><input type="checkbox"/> Yes (0 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (3 peer reviewers)</p>
<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>CDE must explain how the grid presented in this plan will serve as a baseline moving forward and how these data will be displayed.</p> <p>CDE must provide the rationale for the 7-year timeline to meet goals for academic proficiency and provide a timeline for long-term academic achievement goals beyond the seven-year revision of performance levels.</p> <p>CDE must provide long-term goals for all students for improved academic achievement as measured by grade-level proficiency on the annual statewide ELA and mathematics assessments. While the suggested status and change model has merit for innovation, it does not meet the requirement of establishing long-term academic achievement goals.</p> <p>CA must include high school ELA and math in the academic achievement long-term goals independent of the College/Career Indicator proposed for 2018-19 identification.</p> <p>CDE must explain how averaging distance from proficiency for all students and groups will lead to students achieving grade level proficiency. Specifically providing data on the percent of student proficiency in the school and each group for each of the 25 color pairs to demonstrate grade-level proficiency is being measured and is not masking the performance of subgroups using averages.</p> <p>CDE must provide a rationale for citing Status as High when the average is five points below the floor of the proficiency scale score range and explain how it is ambitious.</p>

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE does not provide explicit measures of interim progress academic achievement goals to meet the long-term goals for all students and each subgroup.</p> <p>CDE references Appendix A for interim progress academic achievement goals. Regrettably, the interim goals are not defined, rather a chart highlighting the difference in points needed to move a level from the prior year's performance is provided. The plan cites this information is to be used by the district and school to determine how much progress is needed to reach the goal. P97</p> <p>The interim progress academic achievement goal is based on distance to proficiency and improvement, not clearly articulating the grade-level proficiency requirement.</p> <p>High School ELA and math long-term and interim academic achievement goals are not included.</p> <p>Each school's and each subgroup's interim goals are determined by its baseline and adjusted annually based on the prior year's performance.</p> <p>CDE references to an annual review process that will guide efforts to make progress on all indicators statewide. However, while the plan mentions an Appendix A that provides the measurements of interim progress towards meeting the long-term goals for academic achievement, it was not included in the plan as submitted for review.</p>
<i>Strengths</i>	<p>Inferred from the tables provided in Appendix A, the rate of status and change improvements is greater for groups with lower performance levels, but the lack of a long-term timeline and goal does not provide assurance that all students and groups reach the same long-term goal at the same time.</p>
<i>Weaknesses</i>	<p>CDE describes a process for setting interim goals, however, no interim goals are provided. Districts are required to set interim goals and determine what needs to occur to move a performance level. Establishing interim goals and assurances that the state will monitor progress in districts would strengthen the narrative and demonstrate commitment to improvement.</p> <p>CDE's dashboard would be improved by showing progress on interim and long-term goals towards meeting the standard.</p> <p>Academic achievement for grade level proficiency was not used for the basis for interim goals.</p> <p>Negative trends in Change do not offset Very High Status meeting the goal, which could result in a negative impact on overall school performance in later years.</p>

	Sample guidance provided by CDE would help LEAs and schools measure their progress overtime and realistically describe how a school would move from red/low to green/very high over the seven years.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	CDE must provide explicit interim academic achievement goals for all grade-levels, students and groups for improved academic achievement as measured by grade-level proficiency on the annual statewide ELA and mathematics assessments.

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE did not identify academic achievement in this section. Given the complexity of the calculation, it is unlikely that significant progress in closing statewide proficiency gaps will occur.</p> <p>Grade level proficiency is not explicitly being measured for individual students and, because the averaged distance to the floor of proficiency and the subsequent improvement measure being used, cannot be quantified for gap closure.</p> <p>CDE does not provide baseline proficiency rates to determine the extent to which there are achievement gaps or which subgroups require greater improvements to close proficiency gaps.</p> <p>CDE provides no data to suggest that any existing achievement gaps within the state can be closed using the proposed calculation.</p> <p>The baseline performance of each school establishes interim measures of progress, requiring schools with lower baselines to make more substantial improvement to reach the long-term goals. Schools reaching the interim measures will close achievement gaps.</p>
<i>Strengths</i>	The plan narrative suggests school with lower performance levels will have to make greater improvement to achieve the imprecise interim and long-term goals than higher performance level schools and subgroups.
<i>Weaknesses</i>	CDE does not set goals to measure grade-level proficiency, making it extraordinarily difficult to determine if there is significant progress to closing proficiency gaps. Additionally, the complexity of the Status and Change combined calculation make quantifying the values in a meaningful way problematic. Status and Change should be meaningful to a student for a school to earn credit in an accountability rating.

	<p>An increasing or improved average distance from the floor of proficiency/level 3 and improvement of this calculation from one year to the next does not inherently close achievement gaps. Achievement gaps can persist or even widen with no accountability for improving actual achievement rates among subgroups with the most struggling students. For example, higher performing students can offset or mask lower performing students because the measure averages the points from the proficiency floor scale score. This averaging will allow some students to decrease or not improve performance while a few other very high performing student compensate for their lower performing peers' performance by being much higher than the proficiency floor. A student scoring 45 points above proficient can offset four students performing 10 points below proficient. In a school with 20 students, four students could be scoring 45 points above and 16 students could score 10 points below and the school would be High Status. (Half these students can decrease a point in the following year and the school will still be High Status). In addition, the Status colors have a range of average performances so the average could have decreased from year to year but the school remains in the same color. A High Status school in ELA has a range of '10 above to less than 45 points above' so the school average can drop 34 points from the top of High Status to the bottom of High Status, but still remains a High Status School. Further, the year to year improvement allows schools to decrease ELA performance by 1 to 15 points and school can still remain Blue or Green overall if they are a Very High Status school and be rated Green if they decrease by a point if the school is High Status. P20</p> <p>A CDE-produced report intended to allow schools to target improvement strategies and reach the Status/Change goal (as described on P20-21) for each student subgroup is mentioned but there is no link to any such report. It is unclear what information, beyond the five-by-five colored grids (Tables 4 and 5, pp. 24-25) is included. Information on the content of school-level reports would contribute useful evidence that data is available to meaningfully inform efforts to close school-level performance gaps.</p>
<p><i>Did the SEA meet all requirements?</i></p>	<p><input type="checkbox"/> Yes (# 0 peer reviewer(s)) <input checked="" type="checkbox"/> No (# 3 peer reviewer(s))</p>
<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>CDE must provide baseline data for proficiency/performance of the groups to demonstrate achievement gaps.</p> <p>CDE must provide evidence that supports the proposed method will, in fact, measure and close achievement gaps.</p> <p>CDE must revisit the achievement gap calculation and method once the long-term achievement goals have met all the ESSA requirements.</p>

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE identified long-term graduation goals in terms of the school’s ‘performance colors’ for the four-year cohort rate. The performance color based upon a combined measure of the four-year cohort rate in the current year as Status and the Change in Status from the multi-year average four-year cohort rate for up to the previous three years. P25</p> <p>Long-term goals can be met in multiple combinations of Status and Change.</p> <p>Only schools and subgroups with at least two years of data are included in this graduation measure as Change requires at least two years of data to demonstrate impact from one year to the next. California School, Dashboard Technical Guide 2016-17 School Year. P40</p> <p>The goal for measuring improved graduation rate, as measured by the four-year cohort, is a requirement for the state plan. CDE could include additional goals using the combined measure of Status and Change as an innovative and welcome addition to goal setting.</p> <p>CDE expects all students and subgroups to achieve Blue or Green with High Status and Increased or Significantly Increased Change or Very High Status with Declined Change. The California SBE has set a seven-year timeline line for schools to reach this graduation goal, but expects to revise the graduation rate goal every seven years and have an annual review process, which is not described in this narrative section. P26</p> <p>Baseline graduation data is provided by subgroup for the number and percent of schools that would be rated for each performance color. No data is provided on the actual values for status or change. P28</p> <p>Given the esoteric approach to goal setting for graduation rates, it is not possible to determine if the long-term goals are ambitious. However, it is notable that two-thirds of schools already meet the graduation rate expectation of earning a Very High Status rating with a Declined from the prior year or a High Status rating with an Increased/Increased Significantly. Schools with a declining trend are not meeting ambitious expectations.</p> <p>Not clearly articulating the current year graduation rate may pose concerns for identifying schools with less than 67% graduation rate for supports and interventions.</p>
<i>Strengths</i>	The four-year graduation rate is exclusively used.
<i>Weaknesses</i>	CDE did not specifically identify and describe long-term goals for graduation rate. Additionally, the measure is not only for the four-year graduation rate,

	<p>instead the measure is compounded with improvement of these rates. Even if allowed to measure the graduation and improvement, the goals and colors are not meaningful to parents, educators, policymakers, or the public.</p> <p>The expectations for High Status and the allowable Declined Change does not equate to ambitious goals, because a decline in outcomes is not ambitious.</p> <p>CDE does not explain why a seven-year timeframe is set for students to meet the graduation standard. Detail is not provided about what happens after the seven-year timeframe or why/how graduation rate goals are revised.</p> <p>CDE’s dashboard would be improved by showing progress on interim and long-term goals towards meeting the standard.</p> <p>Not clearly articulating the current year graduation rate may pose concerns for identifying schools with less than 67% graduation rate for supports and interventions.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must provide long-term goals for all students for graduation rate as measured by the four-year cohort rate, not improvement. While the suggested current year rate and improvement model has merit for innovation, it does not meet the requirement of establishing long-term graduation rate goal.</p> <p>CDE must provide a timeline for long-term graduation rate goal beyond the seven-year revision of performance levels.</p>

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>NA: CDE will not use an extended rate. P27</p> <p>CDE indicates that it is currently exploring the incorporation of the five-year cohort graduation rate into their accountability system.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	

<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input type="checkbox"/> No (0 peer reviewers) <input checked="" type="checkbox"/> N/A (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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?

<i>Peer Response</i>	
<i>Peer Analysis</i>	<p>CDE does not provide explicit measures of interim progress graduation rate goals that will lead to meeting the long-term goals for all students and each subgroup.</p> <p>CDE references Appendix A for interim progress graduation rate goals. Regrettably, the interim goals are not defined, rather a chart highlighting the difference in points needed to move a level from the prior year’s performance is provided. The plan cites this information is to be used by the district and school to determine how much progress is needed to reach the goal. P99</p> <p>The interim progress graduation rate goals are based on current year graduation and improvement as set by the LEA. The interim goals are not provided in the plan.</p> <p>The state includes annual evaluation of graduation rates for all students and each group monitoring interim progress toward the long-term goals and adjusting annual/interim targets based on the prior year’s performance.</p>
<i>Strengths</i>	<p>Inferred from the tables provided in Appendix A, the rate of status and change improvements is greater for groups with lower performance levels, but the lack of a long-term timeline and goal does not provide assurance that all students and groups reach the same long-term goal at the same time.</p>
<i>Weaknesses</i>	<p>Graduation rate and change in graduation rates will be used by LEAs as the basis for interim goals. Interim goals were not provided in the plan.</p> <p>Interim graduation rate goals were not explicitly established at the state, district, or school level. Districts and schools are required to determine if/what needs to occur to move a performance level. CDE should provide guidance or assistance in this area.</p> <p>Negative trends in Change do not offset Very High Status meeting the goal,</p>

	<p>which could result in a negative impact on overall school performance in later years. P26</p> <p>Interim graduation rate goals and intervals are not explicitly set at the state, district, or school level. Establishing interim goals and assurances that the state will monitor progress would strengthen the narrative and demonstrate commitment to improvement.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must provide explicit interim graduation rate goals for all students and groups.</p> <p>CDE must provide detail regarding a plan for measuring interim progress towards meeting the goal for graduation rate, both for all students and for subgroups of students.</p>

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Other than discussing that because all students need to meet the green/blue within 7-years, lower performing schools will need to progress at a faster rate than high performing schools, the plan does not provide an adequate response to this requirement.</p> <p>CDE did not identify graduation rates in this section, but rather graduation rates and improvement combined. P25</p> <p>Given the complexity of the calculation, it is unlikely that significant progress in closing statewide graduation rate gaps will occur. First, because graduation rate alone is not explicitly being measured for individual students, and second, because the subsequent improvement measure cannot be quantified for gap closure as improvements are relative to status in the long-term goal.</p> <p>Schools are credited with Increased Change with a 1 to 5 percent point improvement, if a high performing group improves by 5 and a low performing group improves by 1 then both are “Increased” but the gap is wider. P28</p> <p>CDE does not provide baseline graduation rates to determine the extent to which there are graduation rate gaps or which subgroups require greater improvements to close graduation gaps. CDE provides no data to suggest that any existing graduation rate gaps within the state can be closed using the proposed calculation.</p>

	All students and all groups have the same long-term goal. However, since graduation rates by subgroup are not provided, it is unclear if the lower performing groups must improve at greater rates to close graduation rate gaps.
<i>Strengths</i>	
<i>Weaknesses</i>	<p>CDE does not set goals to measure only the current year graduation rate, making it extraordinarily difficult to determine if there is significant progress to closing graduation rate gaps. Additionally, the complexity of the Status and Change combined calculation make quantifying the values in a meaningful way challenging.</p> <p>An improved graduation rate calculation from one year to the next does not inherently close achievement gaps. Achievement gaps can persist or even widen with no accountability for improving actual graduation rates among subgroups with the most struggling students. Schools are credited with Increased Change with a 1 to 5 percent point improvement, if a high performing group improves by 5 and a low performing group improves by 1 then both are “Increased” but the gap is wider. P26</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must provide baseline data and a summary of critical gaps in graduation rates across subgroups.</p> <p>CDE must provide evidence that supports the proposed method that uses improvement will, in fact, measure and close graduation rate gaps.</p> <p>CDE must revisit the graduation rate gap calculation and method once the long-term graduation rate goals have met all the ESSA requirements.</p>

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE is changing assessments from the California English Language Development Test (CELDT) to the English Language Proficiency Assessment for California (ELPAC) in Spring 2018 and will require two years of data to establish a baseline and progress requirements. Once this data are available CDE plans to revise the EL goals. P29</p> <p>Until then, CDE will use the CELDT to set long-term English language proficiency goals in terms of the school’s ‘performance colors’ for progress which is defined as the improvement of one achievement level or exiting</p>

	<p>English learner status, which is expected within five years. However, CDE does not provide the number of achievement levels on EPLAC (CELDT has six) nor what achievement level constitutes English proficiency on either assessment. P29 and California School, Dashboard Technical Guide 2016-17 School Year P33</p> <p>Students have five years to exit English learner status with no specified differentiation for level of achievement when entering. P29</p> <p>As with the academic achievement and the graduation rate goals, CDE has set long-term English language proficiency goals in terms of current year students meeting progress and exiting combined with the change metric over the prior year. P30</p> <p>Long-term English language proficiency goals can be met in multiple combinations of Status and Change. P31</p> <p>CDE does not provide baseline data for students meeting progress or exiting EL status. Without this baseline information and additional information about EPLAC like the number of achievement levels and the achievement level that indicates English proficiency, it is not possible to determine if the progress expectations and goals are ambitious.</p> <p>CDE expects ELs to achieve Blue or a Green with High Status and Increased or Significantly Increased Change or Very High Status with Declined Change. The CA SBE has set a seven-year timeline line for schools to reach the academic achievement goals goal, but expects to revise the performance level every seven years and have an annual review process, which is not described in this narrative section. P30</p> <p>Baseline data for EL goals is provided for the number and percent of schools that would be rated for each performance color. No data is provided on the actual values for status or change. P23-24</p> <p>CDE includes a seven-year timeline in which long-term goals are to be met; regrettably, the narrative states that after seven years the performance levels will just be reset. P20</p>
<i>Strengths</i>	<p>CDE using both progress and exiting EL status.</p> <p>CDE uses a criterion based approach to measure progress on CELDT by requiring students to demonstrate improvement of one achievement level to earn credit for progress. P29</p>
<i>Weaknesses</i>	<p>Unfortunately there will be a data and implementation gap as CDE transitions from the California English Language Development Test (CEDLT) to the English Language Proficiency Assessments of California (ELPAC).</p> <p>The model does not differentiate for higher or lower performing students entering and exiting EL status, and does not explicitly demonstrate how schools are accountable for exiting students within five years.</p>

	<p>The current year progress and exiting combined with improvement over the prior year may not result in all students achieving English language proficiency within five years. The goals do not capture EL progress as measured by only by progress and exiting. Even if allowed to measure progress and exiting combined with and improvement, the goals and colors are not meaningful to parents, educators, policymakers, or the public.</p> <p>An explicit timeline for achieving the long-term EL goals is not provided and no detail is provided about what happens after the seven-year timeframe or why/how performance levels are revised.</p> <p>The expectations for High Status and the allowable Declined Change, up to 10 percentage points, does not equate to ambitious goals. P31</p> <p>CDE expects ELs to be exit status within five years, yet the timeline for meeting long-term goals is set at seven years. Clarification on how these timelines intersect is needed.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must provide long-term goals for English language proficiency. While the suggested status and change model has merit for innovation, it does not meet the requirement of establishing long-term EL goals for all students to reach English language proficiency.</p> <p>CDE must provide a timeline for long-term EL goals beyond the seven-year revision of performance levels.</p> <p>CDE must explain how improvement will lead to ELs achieving English language proficiency within five years. For example, CDE could provide data on the percent of student English language proficient in the school for each Status and Change combination for the 25 color pairs to demonstrate schools that are Blue and Green have all ELs reaching English language proficiency within five years and is not masking the annual performance by using the combined improvement measure.</p> <p>CDE should provide detail on how the transition and determinations for progress will be made from CELDT to ELPAC.</p>

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE will use CELDT, then ELPAC, to measure student English progress and proficiency. However, interim goals are not explicitly set. P100</p> <p>Progress towards English language proficiency Status and Change in English Language Proficiency will be used by LEAs as the basis for interim goals. Interim goals were not provided in the plan.</p>

	<p>Interim English language proficiency goals were not explicitly established at the state, district, or school level. Districts and schools are required to determine if/what needs to occur to move a performance level. P100 If LEAs are permitted to set interim goals, CDE should provide guidance or assistance in this area.</p> <p>These interim goals will undergo substantial revision with the new assessment.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Interim EL goals were not explicitly established at the state, district, or school level. Districts and schools are required to determine if/what needs to occur move a performance level.</p> <p>Negative trends in Change do not offset Very High Status meeting the goal, which could result in a negative impact on overall school performance in later years and will not ensure all kids reach English language proficiency within five years.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must set interim EL goals.</p> <p>If LEAs are permitted to set interim goals, CDE must provide a sample of the guidance to LEAs on how to set interim goals..</p>

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The State has set academic goals that meet several of the requirements in this section. For example, the State is setting proficiency standards aligned with the Smarter Balanced Assessments (SBA) in grades 3-8 and 11, places all students/subgroups on a grid as a baseline, and sets a 7-year timeline to meet the long-term goals. However, there are several areas where the State could provide greater clarification in order to fully determine where the requirements have been met.</p> <p>CDE is proposing an academic achievement indicator only for grades 3-8 in ELA and math. The high school academic achievement is proposed to be part of the college and career readiness indicator developed in 2018-19 and including AP, IB, dual enrolment, a-g completion with a C or better. P32</p> <p>The indicator calculated for grades 3-8 will mirror the long-term goals calculation using the same calculation for all elementary and middle schools to determine a school’s ‘performance colors.’ The performance color based upon a combined measure of the average distance each student scores from the floor of grade-level proficiency status and the change in that value over the prior year. Calculations and colors will be assigned separately for ELA and math. There is no description of combining ELA and math in the indicator. P33</p> <p>This indicator requires as least two years of data to compute the Change measure.</p> <p>While the calculation may be valid and reliable, it does not produce number that is meaningful to users or can quantify how many and how well students are mastering the state standards.</p> <p>Academic achievement is represented by a performance color. This approach can be disaggregated by subgroup. P32</p> <p>The indicator does not directly measure grade level proficiency on the annual statewide assessment. P33 CDE averages the scale score differences from the floor of proficiency for each student to determine the schools’ average distance from the floor of proficiency to rate the school on Status. The Status determination for Medium Status has a point range of ‘5 below to less than 10 above’ the floor of proficiency. Averaging scales scores plus using a 15-point range is not a measure of grade-level proficiency. Then, Status is combined with Change to determine the school’s color rating further confounding the determination of grade level proficiency.</p> <p>CDE does not explain how the academic achievement indicator will measure the performance of at least 95 percent of all students and 95 percent in each group in this section. However, CDE explicitly states that “The participation rate will not affect the calculation and determination of the academic</p>

	<p>indicators.” P42</p> <p>This academic achievement indicator is based on the state’s esoteric long-term goals and does not directly measure grade-level proficiency on the state’s annual assessments of ELA and Mathematics. A Status and Change matrix assigns colors to performance combinations.</p> <p>Averaging is not employed in this indicator.</p>
<i>Strengths</i>	<p>ELA and math indicators will be calculated and reported separately for each subgroup and group.</p>
<i>Weaknesses</i>	<p>CDE does not account for high school academic achievement in this indicator.</p> <p>CDE does not explain how the academic achievement indicator will measure the performance of at least 95 percent of all students and 95 percent in each group.</p> <p>Using and reporting on a color scale for the academic achievement indicator uses a combination of Status and Change provides great opportunity for misinterpretation of results. Earning a Green on the math academic achievement indicator could mean that performance ranged from 35 points above to 25 points, on average, below the proficiency floor and change from the prior year ranged from -10 to more than 15 points. These variations may not be clear to users and result in communication difficulties since the indicator is described as the measure of students meeting grade level proficiency. P21</p> <p>In the spirit and intent of ESSA, this indicator is not designed for transparency and meaningful information for students and parents, educators, policymakers, and the public.</p> <p>CDE did not specify how the ELA and math components will be combined into a single indicator rating.</p> <p>CDE should consider the complexity of the academic achievement indicator and how it will communicate results that are understandable to parents, community, and the public for the student mastery of standards.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (3 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must include only ELA and math assessments in the Academic Achievement indicator. CDE must clarify the College and Career indicator will be moved to the SQSS indicator.</p> <p>CDE must include an academic achievement measure for high schools independent of college and career readiness measures.</p> <p>CDE must account for the participation of at least 95 percent of all students and 95 percent in each group in this section. CDE must change the requirement that was stated in the narrative that “The participation rate will not affect the calculation and determination of the academic indicators.” P42</p>

	CDE must base the academic indicator on grade-level proficiency on state assessments, not improvements.
	CDE must explain how the Change will not mask the Status aspects of offsetting lower achievers with high performers.

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE proposes to use chronic absenteeism for the other academic indicator in for elementary and middle schools. Chronic absentee data will be reported in 2016-17 but CDE will not request the SBE to approve color-coded performance levels any earlier than fall 2018. The calculation proposed is the number of school days absent divided by the days enrolled in which the school was taught. It is unclear how the Status will be determined from the narrative. CDE does not provide information on what will be used in the 2017-18 determinations if performance colors are not determined until after fall 2018. P34</p> <p>Chronic absenteeism is proposed to be computed the same was across all schools and districts in the state and for each subgroup. P34</p> <p>The narrative provides data showing the percent proficient at the end of grade three comparing student chronically absent to those present in K and 1, but does not make a strong case for chronic absenteeism to be a valid and reliable academic indicator. P33</p> <p>Given the cited research in the narrative, CDE should consider whether this this indicator systemically biases already low performing schools and appropriately differentiates among schools.</p>

	CDE references Technical Design Group’s approval of the chronic absenteeism indicator as a reliable academic indicator but does not explain why. P34
<i>Strengths</i>	Allows inclusion of non-tested grades K-2 in accountability.
<i>Weaknesses</i>	<p>While the plan cites research that attendance may impact academic outcomes, chronic absenteeism itself is not proven to directly measure academic achievement. Chronic absenteeism is better suited for inclusion as a SQSS indicator.</p> <p>CDE has been collecting the chronic absenteeism data but has not provided a preliminary assessment of the data accuracy, an explanation of how it will be included in 2017-18 accountability or how performance levels are being set so it is too early to determine if it is valid and reliable.</p> <p>CDE does not provide evidence that chronic absenteeism differentiates across schools.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must use an academic measure for the Other Academic Achievement. While attendance may impact student outcomes, chronic absenteeism itself is not proven to be a valid and reliable measure of academic achievement.</p> <p>If CDE pursues chronic absenteeism, it must provide additional evidence to support the validity and reliability of using it as the Other Academic Indicator.</p> <p>CDE must provide data to demonstrate that chronic absenteeism differentiates schools.</p>

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE's entire response to this section: <i>The Graduation Rate Indicator will use the four-year cohort graduation rate. The same calculation methodology is used at both the school level and the student group level.</i></p> <p><i>Currently, students with the most significant cognitive disabilities are held to the same graduation requirements as all other students.</i></p> <p>Given the limited response, it is assumed that the same method for long-term graduation rate goal setting and performance colors are applied to the indicator, though it is not explicitly stated. If the assumption is accurate, the same analysis, strengths, weaknesses, and clarifications will be needed as for the long-term graduation rate goals. P34</p> <p>The cohort graduation rate is used uniformly across all schools and subgroup. The earlier section on graduation rate implies a lag in the use of the data, but there is no definition of the calculation other than a three year weighted average is used for improvement comparisons.</p> <p>The calculation is easily accomplished for subgroups, but the narrative does not state this disaggregation will occur.</p> <p>Without additional detail, validity and reliability cannot be established.</p>
<i>Strengths</i>	<p>Students with the most cognitive disabilities are held to the same standards as all students.</p> <p>The four-year graduation is used exclusively rather than using a five-, six-, seven, year combined rate.</p>
<i>Weaknesses</i>	Please see long-term goals comments (A.4.iii.b.1).
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must provide clarification as to how the graduation rate indicator is computed and used for accountability.</p> <p>CDE must provide details of whether the calculation uses lagged data.</p> <p>Please see long-term goals comments (A.4.iii.b.1).</p>

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE does not describe how the EL indicator will be computed using ELPAC. Only the current process for CELDT is provided. CDE does not indicate the same method will be used to calculate this indicator using the new ELPAC. P34-35</p> <p>Given the response, it is assumed that the same method for long-term EL goal setting and performance colors are applied to the indicator, though it is not explicitly stated. If the assumption is accurate, the same analysis, strengths, weaknesses, and clarifications will be needed as for the long-term EL goals in section A.4.iii.c.1.</p> <p>The description of the Progress in Achieving English Language Proficiency indicator is the same across all LEAs for grades K-12 provided they have English learners. The indicator is aligned with the state long-term goal and timeline and is administered</p> <p>The definition for English proficiency will be revised with the new assessment after Spring 2018.</p>
<i>Strengths</i>	<p>California tests students in grades K-12 meeting the grade level requirement.</p> <p>CDE has set five levels of performance on the CELDT to define proficiency. Students must move up a performance level to meet progress and for a school to earn accountability credit on this indicator. Hopefully this progress measure will carry forward to ELPAC.</p>
<i>Weaknesses</i>	<p>CDE is changing assessments from the California English Language Development Test (CELDT) to the English Language Proficiency Assessment for California (ELPAC) in Spring 2018 and will require two years of data to establish a baseline and progress requirements. The 2016-17 dashboard will use CELDT data. However CDE does not provide an explanation of data that will be used on the 2017-18 dashboard. Since two years of data are required to demonstrate progress, and because CDE did not provide narrative on how it will measure progress from one year to the next, it is unclear if the EL indicator will be included for 2017-18. Once this data is available CDE plans to revise the EL goals. P29</p> <p>Please see Weaknesses in long-term goals comments (A.4.iii.c.1).</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (3 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet</i>	<p>CDE must provide clarification as to how the EL indicator is computed and used for accountability in 2017-18 and beyond.</p> <p>Please see long-term goals comments (A.4.iii.c.1).</p>

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE proposes to use Suspension Rate as the measure of school quality and student success for all schools K-12 with different expectations by grade span. P35</p> <p>It is assumed that the narrative should reference the California School Dashboard Technical Guide 2016-17 School Year P27-32 for details on how the indicator is computed and applied.</p> <p>CDE does not explain or provide data or research to demonstrate how Suspension Rate is meaningful, reliable, valid, and comparable and ensures that they are not systemically biased specifically.</p> <p>There is insufficient information about the calculation, about separate cut score for the three school categories and no detail concerning cut scores that will create the five-by-five tables based on Status and Change.</p> <p>CDE proposed to use the AP, IB, Dual enrollment, and a-g completion with a C or better from the College/Career Indicator for HS in the Academic Achievement Indicator. This measure should be moved to the School Quality and Student Success Indicator.</p>
<i>Strengths</i>	<p>The same indicator will be used in all K-12 schools. Different distributions for cut points will be used at elementary, middle, and high schools.</p> <p>LEAs and schools that did not report in the current, previous, or both years are assigned a color rating of “orange” providing an incentive for reporting. P30, Technical Guide).</p>
<i>Weaknesses</i>	<p>CDE does not include evidence on why suspension rate was selected for this indicator. Contextual information, including the issue of bias, would have</p>

	<p>improved the rationale for this indicator.</p> <p>CDE does not provide evidence of reliability and validity of suspension rates for use in accountability.</p> <p>CDE did not provide information on how the data would be distributed on the grid or the cut scores so it is not possible to determine if there is meaningful differentiation or how much progress LEAs/schools would need to make to meet the expectation.</p> <p>CDE does not explain why there is a lag in the suspension data. P27, Technical Guide indicates that for the first year of the dashboard’s release in 2017-18, will display suspension rates for 2014-15 and the change from 2013-14.</p> <p>CDE did not provide research-based evidence as to how the Suspension Rate indicator will increase student achievement and decrease achievement gaps.</p>
<p><i>Did the SEA meet all requirements?</i></p>	<p><input type="checkbox"/> Yes (0 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (3 peer reviewers)</p>
<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>CDE must provide a clear rationale on why it selected suspension rates for this indicator (research, data, etc.).</p> <p>CDE must explain how the Suspension Rate indicator is valid and reliable and how the Technical Design group made this determination, how suspension rates are comparable and measurable, and meaningfully differentiate without systemically biasing any group or school.</p> <p>C DE must provide an explanation (or minimally a reference to the <i>California School Dashboard Technical Guide 2016-17 School Year</i> P27-32) for how the indicator is computed and applied.</p> <p>CDE must provide the grids with the distributions by level and change.</p> <p>CDE must confirm the reporting cycles for the data to address the apparent lag in the data.</p> <p>As referenced in the Academic Achievement indicator, CDE should include the AP, IB, Dual enrollment, and a-g completion with a C or better from the College/Career Indicator for HS in the School Quality and Student Success Indicator.</p> <p>CDE must provide an explanation of how the CCI was revised by the by the CCI Workgroup convened in Fall 2017. P58 While CDE provides definitions, method, and cut scores for the CCI in the technical paper, the use in accountability for 2017-18 is not finalized. P52-58</p> <p>As referenced in the Other Academic Indicator, CDE should include Chronic Absenteeism in the School Quality and Student Success Indicator.</p>

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE will rate each subgroup and all students on each indicator using five performance levels, listed highest to lowest: Blue, Green, Yellow, Orange, Red. The performance levels are a combination of current year Status (Very High, High, Medium, Low, Very Low) and Change (Declined Significantly, Declined, Maintained, Increased, Increased Significantly) over the prior year. P36</p> <p>The Status and Change indicators were ranked in order to determine percentile cut scores. The narrative reads that these scores will inform criterion referenced cuts to be used for seven years when CDE will propose revisions, or at an earlier date if the exiting cut points no longer meaningfully differentiate. P37 It is unclear whether these cut points will remain the same as the narrative states that they will only ‘generally’ remain in place for seven years. Clarification is needed on what this means.</p> <p><u>Indicators</u> Academic Achievement: Math, ELA, College/Career for HS Other Academic Indicator: Chronic Absenteeism, Graduation Rate English Language Proficiency: Progress/Exiting School Quality and Student Success: Suspension Rate</p> <p>While CDE provided data that shows the distribution of schools into the 25 different cells of the Status/Change matrix to determine performance colors on ELA, Math, and Graduation rate the EL indicator was based on the CELDT, not ELPAC, and there was no data for College/Career for HS, Chronic Absenteeism, and Suspension Rate. P20-22, 26-27, 31 Without data it is unclear how these indicators will be used to differentiate schools. Even with the data for the six different grids, schools can only be differentiated based on one indicator at a time.</p> <p>Additionally, there are multiple ways a school can earn a Blue, Green, Yellow, Orange and Red designation making differentiation more challenging even within a single indicator.</p> <p>The state describes its system of annual meaningful differentiation for all schools in the state. It includes all indicators and each indicator applies to all students and each subgroup.</p>
<i>Strengths</i>	CDE proposes five categories for differentiating indicators making it easier to understand the data.

	Table 9 on P37 is a useful illustration of the five by five grid that shows school, LEA, and student group performance for each indicator. In this section of their plan, CDE makes clear that schools will earn a color for the all students group and each group with at least 30 students.
<i>Weaknesses</i>	It remains unclear if the schools will be differentiated based on the indicator data provided in the plan. It is unclear whether the color grid cut points will remain the same as the narrative states that they will only ‘generally’ remain in place for seven years. Clarification is needed on what ‘generally’ means.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	CDE must address the weaknesses and provide clarifications on how the requirements are fully met in sections A.4.iv.a-e, to the meet statutory requirements for annual meaningful differentiation. CDE must explain how the individual indicators will work individually, and in concert, for meaningful school differentiation.

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	CDE does not explicitly address weighting of each indicator but implies that each indicator grid has the same weight. CDE only explains within indicator weighting as being equal between Status and Change. P37 CDE states that because six of the seven indicators are academic they outweigh the suspension rate indicator used for the School Quality or Student Success indicator. However, CDE does not provide evidence on how it will operationalize this statement to emphasize the much greater weight on the academic achievement and EL indicators. P37
<i>Strengths</i>	
<i>Weaknesses</i>	CDE did not provide evidence as to what the weights are and if/how the weightings were determined. All indicators are implied to be weighted equally. CDE considers Chronic Absenteeism as an Other Academic Indicator, but it is

	<p>better suited for the SQSS indicator which would reduce the number of grids counted towards academic indicators.</p> <p>CDE includes College/Career Indicator in Academic Achievement, but it is better suited for the SQSS indicator which would reduce the number of grids counted towards academic indicators.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must provide evidence of the weights and if/how the weights were determined. With all weights equal, each indicator can wholly impact identification meaning the School Quality and Student Success Indicator could greatly outweighs the academic indicators in terms of identification. If CDE does not provide numeric weights for each indicator, business rules must be established to ensure each indicator carries substantial weight and that the SQSS indicator exclusively does not prevent schools from entering, or allow schools to exit, CSI or TSI. Examples are provided in A.4.vi.a.</p> <p>CDE must provide evidence on how it will operationalize the statement that six of the seven grids are based on achievement to emphasize the much greater weight on the academic achievement and EL indicators.</p> <p>CDE must relocate College/Career Indicator to the School Quality and Student Success Indicator.</p> <p>CDE must include an academic indicator for elementary and middle schools, and relocate Chronic Absenteeism to the School Quality and Student Success Indicator. While the plan cites research that attendance may impact academic outcomes, chronic absenteeism itself is not proven to directly measure academic achievement. Please see additional comments in A.4.iv.b.</p>

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The State notes that the CDE will issue accountability reports for all traditional schools and LEAs. It also notes that two types of schools would be excluded from the accountability system—small and alternative schools.</p> <p>CDE indicates it will use different methods for other types of schools. P38 Small schools, >11 but <30 students, data will be reported on Status and Change, but colors will not be designated. There was not detail on how schools with <11 students will be rated. P38</p>

	<p>K-2 schools will have colors determined by matriculation parings using grade 3 data. P38</p> <p>New schools will not be rated until there are at least two years of data. P38</p> <p>Alternative schools will be rated “based on comparable indicators that are more appropriate for their school mission.” These ‘comparable’ indicators were not discussed in the narrative so it is unclear how alternative schools will be rated. P38</p>
<i>Strengths</i>	K-2 schools will be rated based on matriculation patterns using grade 3 scores.
<i>Weaknesses</i>	<p>CDE does not address how accountability determination will be made for schools with 10 or fewer students. The information from the small schools will roll into the LEA report card, but it appears that they will be excluded from the accountability system. CDE does not provide an analysis of how many schools will be excluded from the accountability system based on these policies.</p> <p>New schools will not be rated.</p> <p>No detail was provided on how alternative schools will be rated using ‘comparable indicators.’ While schools may be differentiated using a different method, however, using different, undescribed indicators does not meet the statutory requirement.</p> <p>Accountability determinations for Students with Disabilities centers were not specifically addressed.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must provide a timeline for developing the reports for alternative schools.</p> <p>CDE must provide detail on the indicators used for alternative school ratings that are comparable but more appropriate for their school mission and then demonstrate the comparability of the indicators and the likelihood they will improve student learning outcomes.</p> <p>CDE must rate all schools, including new schools.</p> <p>CDE must provide information on how schools with <11 students will be rated.</p>

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)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE has not, and will not until January 2018, finalize a plan to identify at least the lowest performing 5% of schools. P40</p> <p>The CDE plans to submit to the US Department of Education an approach to identifying schools beyond the baseline method using the latest 2017 data release and will include at least three years of data for all available indicators. However, it is unclear how three years of data will be provided given the prior plan narrative indicates that many data collections have yet to commence (ELPAC data) or have only been collected for a single year (chronic absenteeism). P40</p> <p>CDE proposes to identify comprehensive support schools starting with the LEAs identifying schools for local technical assistance based on the Local Control Funding Formula (LCFF), but no explanation is provided on how this list was generated, then CDE will add Title I schools to the identification defining schools as greatest need if all indicators are Red or all Red and one Orange. This will not yield 5% of Title I schools so further color combinations are needed. P39-40</p> <p>Given the proposed approach, it is unclear if there will be a consistent way of identifying schools for CSI with LEAs identifying some schools and the state identifying some schools.</p> <p>If state identification is based on all indicators and the requirement is all Red or all Red and one Orange, it will be possible for a school to have a Yellow Suspension Rate indicator and Red Achievement and Graduation rate indicators and therefore not be identified as CSI based solely on the School Quality and Student Success Indicator. Which would mean the weighting of the School Quality and Student Success Indicator greatly outweighs the academic indicators in terms of identification.</p>
<i>Strengths</i>	<p>CDE is aligning state and federal accountability requirements that will provide stakeholders with one system to examine the performance of LEAs, schools, and students. In the past, states could have their own system and the NCLB system. Having two systems undermines them both.</p>
<i>Weaknesses</i>	<p>CDE does not have a fully developed plan for identifying CSI schools.</p> <p>CDE’s proposal to identify comprehensive support schools starting with the LEAs identifying schools for local technical assistance based on the Local Control Funding Formula (LCFF), but no explanation is provided on how this list was generated, then CDE will add Title I schools to the identification defining schools as greatest need if all indicators are Red or all Red and one</p>

	<p>Orange. This will not yield 5% of Title I schools so further color combinations are needed. This process will not be finalized until January 2018. P39-40</p> <p>Pre-existing state practices may prevent compliance with statute.</p> <p>CDE’s current proposal allows for identification at the LEA and state level, which may result inconsistent identification of schools from LEA to LEA.</p> <p>CDE does not have a plan to account for the School Quality and Student Success Indicator as keeping a school out of CSI.</p> <p>Weighting of indicators would improve differentiated response and identification.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must develop and submit a plan that will identify the lowest performing 5% of Title I schools.</p> <p>CDE must consistently identify schools for CSI at the state level.</p> <p>CDE must not allow the School Quality and Student Success Indicator to be the only indicator that keeps a school out of CSI.</p>

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)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE proposes to identify high schools for CSI if the [four-year adjusted cohort – inferred from dashboard] graduation rate for all students is <67% in the three consecutive prior years. Schools will be identified for the first time in 2018-2019. P40</p> <p>The method for identification using three consecutive years sets a higher bar for entering CSI than the use of a three-year average or annual measure which are expressly permitted under ESSA, while the three consecutive year method is not.</p> <p>CDE will not include high schools with less than three years of graduation rate data for identification for comprehensive support. P40</p>
<i>Strengths</i>	CA will use a four-year rate, rather than a five-, six-, or seven-year rate, for

	CSI identification.
<i>Weaknesses</i>	The method for identification using three consecutive years sets a higher bar for entering CSI than the use of a three-year average or annual measure which are expressly permitted under ESSA, while the three consecutive year method is not.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	CDE must identify CSI schools using a multi-year average or annual measure which are expressly permitted under ESSA. CDE must identify all schools, including new schools, for CSI under Low Graduation Rates.

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)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	CDE will identify any school that did not exit additional targeted support within four years for CSI beginning in fall 2021. P41
<i>Strengths</i>	
<i>Weaknesses</i>	CDE has not finalized methods for identification for CSI and TSI, which is proposed for January 2018.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	CDE must provide an explanation of how schools will be identified for comprehensive support as required in A.4.vi.a. CDE must provide an explanation of how schools will be identified for targeted support as required in A.4.vi.f. CDE must revisit identification once exit criteria are revisited as simply not meeting the entry criteria is not a rigorous or meaningful exit criteria (especially when Change is a component of the performance level).

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	CDE will identify for comprehensive support every three years. CDE will begin supporting in 2018-19 and every three years from then; however, it should clarify the timeline for future identification and include which years of data will be considered.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	CDE does not provide a definition of “consistently underperforming.” CDE does not provide a timeframe for schools to have consistent underperformance to be identified. The plan does not specify if the group has to be underperforming for two, three, or four years to earn the TSI identification. CDE will annually identify as consistently underperforming subgroups as any school in which any student group, on its own, meets the criteria for being identified for comprehensive support as the lowest-performing 5 percent Title I schools. P41 However, CDE has not yet finalized its plan to identify CSI based on the lowest performing 5% of Title I schools.
<i>Strengths</i>	CDE commits to annually identifying consistently underperforming subgroups.
<i>Weaknesses</i>	Identification of these schools is contingent on the rules for identification of CSI school for the lowest performing 5% which have not been finalized.

<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must provide a definition of “consistently underperforming.”</p> <p>CDE must finalize identification of the consistently underperforming subgroups once the method for determining CSI lowest performing 5% is finalized.</p>

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE will use the same method that is used to identify the lowest performing 5% of Title I schools. However, this method has not been fully developed or finalized.</p> <p>CDE proposes to identify TSI schools if any subgroup meets the same combinations of color coded performance. However, the color coded performance combinations vary which could result in schools being misidentified. For example, schools are identified as CSI because of a three Red and two Orange color combination. This could mean CSI is identified because of Orange for SQSS and ELP but school would not be identified for TSI if it was a four Red and one Orange combination even if Orange was in ELA, making it lower performing then the CSI school.</p> <p>Currently, the definition for TSI consistently underperforming and TSI lowest performing schools are the same. CDE must include a timeframe to define consistently underperforming in A.4.vi.e to resolve this duplicative identification.</p> <p>Beginning in 2018-19, CDE will identify TSI low performing schools every three years.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	CDE has not finalized the identification procedure for CSI. The TSI identification is dependent on the CSI method for identification and presents concerns about how the same combinations of color coded performance policy

	will be operationalized to ensure accuracy of TSI identification.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	CDE must address how it will identify additional targeted support schools once the CSI method for identifying the lowest performing 5% is finalized.

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	NA: CA does not identify any additional categories of schools. P42
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input type="checkbox"/> No (0 peer reviewers) <input checked="" type="checkbox"/> N/A (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE does not factor the requirement for 95% test participation into the academic achievement indicator calculation or determination for all students nor each subgroup. CDE stated in the narrative that “The participation rate will not affect the calculation and determination of the academic indicators.” P42</p> <p>CDE will not differentiate 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</p>

	<p>which the school missed the requirement.</p> <p>CDE will report an icon, one of four unique symbols, for ELA and math separately for participation rates and offer technical assistance to schools not meeting the 95% tested requirement. P42</p>
<i>Strengths</i>	
<i>Weaknesses</i>	CDE does not factor the requirement for 95% test participation into the academic achievement indicator calculation or determination for all students nor each subgroup. P42
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must account for the participation of at least 95 percent of all students and 95 percent in each group in this section.</p> <p>CDE must change the requirement that was stated in the narrative that “The participation rate will not affect the calculation and determination of the academic indicators.” P42</p>

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)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Comprehensive support schools will exit if they no longer meet the reason for their identification. This is expected within four years. P42</p> <p>Since the CSI entry criteria on not finalized, it is difficult to fully respond to this section.</p> <p>It is not clear within many years a school must remain in Comprehensive Support before they can demonstrate they are eligible to exit. Allowing schools to exit CSI the year following identification may result in a “revolving door” of exiting and reentering.</p> <p>The exit criteria do not ensure continued progress to improve student academic achievement. Schools are expected to meet Status and Change goals to earn a performance color. Given the factor of Change, school colors can vary/improve year to year with the potential that student achievement can</p>

	decrease over that time frame.
<i>Strengths</i>	
<i>Weaknesses</i>	<p>CDE sets a low bar for schools to exit comprehensive support and improvement.</p> <p>Schools are not required to participate in CSI for a designated number of years before they are eligible to meet the exit criteria.</p> <p>The exit criteria do not ensure continued progress to improve student academic achievement and school success.</p> <p>Exit criteria are described only as improvement such that the school no longer meets the criteria initially used to identify that school for comprehensive support. Unfortunately, using a normative exit criteria means, schools could decrease performance from one year to the next and exit CSI because other schools did worse.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must include in its comprehensive support exit criteria the expectation of schools improving student achievement or meeting goals, rather than not meeting the entry criteria.</p> <p>CDE must revisit the CSI exit criteria once the CSI entry criteria are finalized.</p>

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)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Targeted support schools will exit if they no longer meet the reason for their identification. This is expected within four years. P42</p> <p>Since the CSI entry criteria on not finalized, it is difficult to fully respond to this section on TSI exit criteria.</p> <p>It is not clear within how many years a school must remain in Targeted Support before they are eligible to meet the exit criteria.</p>

	<p>The exit criteria do not ensure continued progress to improve student academic achievement. Schools are expected to meet Status and Change goals to earn a performance color. Given the factor of Change, school colors can vary/improve year to year with the potential that student achievement can decrease over that time frame.</p> <p>The exit criterion is simply no longer meeting the entry criteria. It includes the required four year timeline with improvement on one indicator – but improvement does not have to be on the indicator that resulted in the TSI identification. P42</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Schools are not required to participate in TSI for a designated number of years before they are eligible to meet the exit criteria.</p> <p>The exit criteria do not ensure continued progress to improve student academic achievement and school success.</p> <p>Improvement is required on only one indicator, and that indicator does not need to be the same one that identified the school for TSI. This means a school could decline in their Academic Achievement indicator and improve in their SQSS indicator and exit TSI.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must include in its targeted support exit criteria the expectation of schools improving student achievement or meeting goals, rather than allowing schools to improve on any indicator. The equal, or entire, weighting on any indicator - including SQSS - poses concerns.</p> <p>CDE must revisit the TSI exit criteria once the CSI entry criteria are finalized.</p>

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE is focusing intensive interventions on building LEA capacity, not assisting schools.</p> <p>CDE’s plan narrative focuses on, and strongly emphasizes, the use of LEA strategies from the onset and through the initial CSI and TSI process. Using the same mechanisms that were not effective in getting school to exit CSI initially will not be effective in providing intensive interventions. P44</p>

	<p>Any comprehensive support school that does not exit within 4 years will not be directly assisted by the state, but rather the support will focus on building LEA capacity by requiring the LEA to partner with an external entity, agency, or individual to help with a needs assessment, root cause analysis, developing a new improvement plan, and monitoring and evaluation. P45</p> <p>The state has established a system of intensive support but is not specific, does not mention staffing or budgeting, and has not demonstrated it is an effective strategy.</p> <p>CDE provided background on the Local Control Funding Formula describing a multi-tiered approach districts use to provide support to schools within an integrated local, state, and federal accountability and improvement system. There is concern about how LEAs that are not receiving LCFF technical assistance will provide intensive interventions.</p>
<i>Strengths</i>	LEAs are responsible for providing interventions for schools in need of comprehensive support and improvement.
<i>Weaknesses</i>	<p>CDE's strategy for intensive interventions mirror the CSI and TSI support which did not lead to exiting CSI and TSI.</p> <p>The State indicates it will rely primarily on an addendum to the Local Control and Accountability Plan (LCAPs) to meet this ESSA requirement. CDE does not provide a sample of the LCAP Addendum, the actions it may trigger, who would be responsible for implementing actions, and the authority the CDE would have to intervene if the school continues to fail.</p> <p>The State describes a Multi-Tiered System of Supports (MTSS) designed to provide increasing levels of support to LEAs in ascending order of need. However, CDE does not explain how each level of support is initiated based on school identification. CDE does not provide information on how it will monitor progress through the levels of intervention and the consequences for LEAs that do not improve schools within a reasonable period. Additionally, it is not clear how interventions become more rigorous.</p> <p>Interventions are described in general terms, with no specific mention of changes to schools staffing or the school calendar, and no mention of follow-up consequences in the event that the more rigorous actions do not improve student performance and/or growth.</p> <p>CDE should provide evidence that this approach has led to the improvement of low performing schools.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	CDE must clearly define the more rigorous state-determined actions required for schools identified for comprehensive support and improvement that do not meet the exit criteria and the strategies used to build LEA capacity to improve student outcomes rather than just improving planning processes. For example, students could be allowed to transfer to a higher performing school.

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE provides assurances that it will review resource allocation, highlighting five different reviews at a very high level to support school improvement. P46</p> <p>CDE identifies different subsets of LEAs for monitoring. “LEAs and schools identified for CSI and TSI” – but LEAs should not be identified for CSI - and LEAs that serve a significant number of CSI and TSI schools – the explicit federal requirement. It is unclear which set of LEAs will be periodically reviewed.</p>
<i>Strengths</i>	<p>CDE provides some examples of elements of their review process, including but not limited to reviewing and approving CSI plans and TSI plan, monitoring of LEAs with a significant number of schools identified for CSI/TSI, and differentiated assistance.</p>
<i>Weaknesses</i>	<p>CDE identifies different subsets of LEAs for monitoring. “LEAs and schools identified for CSI and TSI” – but LEAs should not be identified for CSI - and LEAs that serve a significant number of CSI and TSI schools – the explicit federal requirement. It is unclear which set of LEAs will be periodically reviewed.</p> <p>CDE provides limited detail on what will result in the review processes conducted by LEAs. Given the state is responsible for the resource allocation review; it is unclear how the state will support for school improvement if the LEA is conducting the review.</p> <p>With the exception of annual Federal Program Monitoring by the CDE, “periodically” is not defined for the other reviews to demonstrate the adequacy of timeframe and scope of reviews.</p> <p>No specific examples of resource allocation (e.g., instructional materials, preschool and/or afterschool programs, technology resources) were mentioned.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (3 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must clearly specify that it will conduct the resource allocation monitoring for LEAs that serve a significant number or percentage of schools in CSI and TSI.</p> <p>CDE must explain how the state will support for school improvement if the LEA is conducting the resource allocation monitoring.</p>

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE commits to support all LEAs receiving assistance under Title I, Part A to continuously improve student outcomes by providing planning supports, reviewing plans, and monitoring the implementation of plans – formal processes. CDE will also provide to Title I LEAs: a Title I, Part A Guidance document, technical assistance, statewide conferences and local institutes, and an online collection of resources and strategies that support continuous improvement. The plan narrative provides a short summary of these supports and strategies. P47-49</p> <p>CDE states that supports for LEAs with a significant number of schools identified for CSI and TSI will be differentiated to address specific local needs, but it is not specified as to how this will be done.</p> <p>CDE describes an extensive plan to provide LEAs with technical assistance in all areas of school operation, addressing specific needs of specific schools and LEAs.</p>
<i>Strengths</i>	<p>LEA’s maintain ownership of improving schools. CDE is empowering districts to take the lead on improving schools.</p>
<i>Weaknesses</i>	<p>CDE does not provide a theory of change on how it will approach its assistance to LEAs or provide evidence that these processes have led to positive outcomes for student or schools.</p> <p>CDE will work with LEAs on their LCAP Addendum and monitor Title I LEAs, but the plan does not discuss staff knowledge or capacity to conduct these activities.</p> <p>CDE assumes all districts are up for the challenge, however, some district may not recognize if/where deficiencies lay in their planning and intervention process. With limited state oversight, improvement of processes and implementation could be delayed.</p> <p>CDE provides limited data or “evidence” for the approved interventions LEAs may use in their turnaround frameworks.</p> <p>Little detail on how technical assistance is differentiated is provided.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (3 peer reviewers)</p> <p><input type="checkbox"/> No (0 peer reviewers)</p>

<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	
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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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	NA
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input type="checkbox"/> No (0 peer reviewers) <input checked="" type="checkbox"/> N/A (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Rates at which students are taught by an unqualified, out-of-field, or inexperienced teachers are provided in the narrative and link to the California State Plan to Ensure Equitable Access to Excellent Educators report, August 2016. Data indicates that students in poverty and minority students are more likely to be instructed by unqualified, out-of-field and/or inexperienced teacher, data was provided to illustrate the inequity. P50-51 However, CDE did not explicitly address Title I, Part A schools.</p> <p>CDE is committed to publish an annual report on equity gaps and the state’s progress to eliminate the gaps.</p>
<i>Strengths</i>	<p>CDE aligns the ESSA requirements with the LCFF requirements, which will provide the public with uniform and consistent data on equitable access.</p> <p>Although not for Title I, Part A schools, CDE acknowledged that students attending high-poverty, high-minority schools are more likely to be taught by unqualified, inexperienced, and out-of-field teachers than students in low-poverty and low-minority schools.</p>
<i>Weaknesses</i>	<p>CDE does not provide data for Title I, Part A schools.</p> <p>CDE does not identify ineffective teachers at the state level, rather they are identified as Unqualified which is determined based on the permit/licensure (which they now define as ineffective for ESSA), not effectiveness. P50</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (3 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>CDE must provide data on the Disproportionate Rates of Access to Educators for students in Title I, Part A schools.</p>

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?

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.

- 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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE is committed to improving schools conditions as part of the goals set in California’s Local Control Funding Formula (LCFF), specifically Priority 6 which focuses on School Climate. For the last several years CA has been collecting and reporting data on suspensions and expulsions and safety and connectedness through surveys of students, parents, and educators, to improve school climate and conditions. P53</p> <p>CDE’s plan narrative outlines the supports and assistance provide to LEAs as well as strategies for a Multi-Tiered System of Support to improve conditions for learning. P54-56</p> <p>CDE specifically has strategies to reduce bullying and harassment, overuse of discipline, and promoting safe and healthy schools through mental health services, as well as alcohol and tobacco preventions services. P57-58</p> <p>LEAs will use information on chronic absence and suspension rates provided by the state to address school conditions in their local plans. This is an appropriate use of these data.</p>
<i>Strengths</i>	The State is aligning the ESSA and LCFF (Priority 6) school condition requirements which should help leverage State and local resources in promoting safe and healthy schools. P53
<i>Weaknesses</i>	CDE provides a wealth of resources LEAs and schools can access, but does not discuss the CDE’s capacity to provide meaningful supports to the field on school climate and conditions.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.7: School Transitions (ESEA 111(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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE leaves school transitions to LEAs, but provides support in planning, reviewing plans, and monitoring implementation as well as providing a collection of technical assistance materials, conferences, and online resources. P58</p> <p>CDE lists strategies and specific transition planning requirements for Elementary, Middle, and High school as well as dropout preventions methods for meeting student needs and providing effective transitions, but leaves most work up to the LEAs. P60-66</p> <p>CDE has extensive existing procedures in place to address transitions and at risk students.</p>
<i>Strengths</i>	<p>CDE aligns the ESSA and LCFF requirements, which should help leverage State, and local resources in promoting effective school transitions. (page 65).</p> <p>CDE also includes Early Education to Elementary school transitions to signify the importance of these transitions.</p> <p>CDE describes the use of evidence-based strategies and cites research for most strategies being employed.</p>
<i>Weaknesses</i>	It is not clear how CDE will monitor the effectiveness of its technical assistance in being able to support the implementation of these activities in LEAs throughout the state.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	Through timely and meaningful consultation with LEAs representing the

	<p>geographic diversity of the state CDE obtained input and feedback during statewide meetings, conferences, and other forums with a wide range of stakeholders, to establish standardized statewide entrance and exit procedures for ELs.</p> <p>CDE thoroughly described the statewide standardized entrance and exit procedures for English learners. All English learners will be identified within 30 days after beginning the school year or upon enrollment (no timeframe provided) through the Home Language Survey. P80</p> <p>Exit procedures require:</p> <ol style="list-style-type: none"> 1. Assessment of language proficiency using the state test of English language proficiency; 2. Teacher evaluation including a review of the student’s curriculum mastery; 3. Parent opinion and consultation; and 4. Comparison of student performance in basic skills against an empirically established range of performance in basic skills based on the performance of English proficient students of the same age. <p>CDE commits to the same standardized procedures exiting students from the EL subgroup that are used for Title I reporting and accountability purposes. The ELPAC annual summative assessment will be administered as an operational assessment statewide in spring 2018. To ensure that exit from EL status is conducted in a valid and reliable manner, a cut-score validation study and multi-method exit criterion study will be conducted based on data received from the ELPAC summative assessment. P81</p>
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	CDE provides high level support to ELs through state standards, developing

	<p>state assessments, establishing long-term goals and in the accountability system as well as providing resources to support LEAs. P81</p> <p>A statewide English language proficiency assessment is used to determine and measure the long term goal and interim goals.</p> <p>CDE’s plan provides ideas and resources but does not provide an explanation of how the state will actually assist eligible entities in meeting the standards, leaving this responsibility up to the LEAs.</p> <p>CDE does not appear to provide technical assistance to LEAs which underperform against the interim targets (though these are set by the district and not provided in the plan) on EL proficiency.</p> <p>CDE will provide a criterion-based growth model to measure student progress toward EL proficiency; however, CDE does not describe any strategies it will use to support EL progress and proficiency.</p> <p>CDE describes its standards for English language proficiency but does not describe how it will assist entities to ensure EL can also meet the state’s challenging ELA and Mathematics standards.</p> <p>CDE requires LEAs to submit plans that describe successful approaches to English acquisition and expects consistent performance and improvement as monitored through the accountability system.</p>
<i>Strengths</i>	<p>The State has set the California English Development Standards (CA ELD) that have been validated to align with the State’s English Language Arts standards. This alignment will help ensure that all students are being held to the State’s challenging academic standards.</p> <p>CDE requires LEAs to address how they are supporting English learners in their LCAP Addendum.</p>
<i>Weaknesses</i>	<p>Development of goals and targets does not necessarily equate with providing assistance to LEA’s to ensure that English learners meet challenging State academic standards.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (3 peer reviewers)</p> <p><input type="checkbox"/> No (0 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>CDE has a well-establish process for monitoring LEAs in their use of federal funds including Title III, Part A.</p> <p>CDE provided some detail on what will be provided and how strategies will be modified if they are not effective. Like many other areas, this is left mainly to LEAs and Regional County Offices to navigate. P84</p> <p>CDE provides access to resources, instruments, training and experts to support the monitoring process and to help address findings, but details are limited on what this entails and how this helps improve student outcomes and strategies for helping students. P84</p> <p>Technical assistance and support described in the plan is limited and distant. Cited supports are root cause analysis and technical assistance to modify existing strategies in partnering with CA Title III Regional County Offices to collaborate and disseminate information.</p> <p>CDE states that in the event that strategies funded under Title III are not effective, further assistance and tools are provided to help LEAs modify current strategies. However, these strategies are not described. P84</p>
<i>Strengths</i>	CDE has a well-establish process for monitoring LEAs in their use of federal funds including Title III, Part A. The system includes both onsite and desk monitoring. LEAs are notified of any findings and are required to address them within a specified deadline.
<i>Weaknesses</i>	CDE's plan indicates it will provide technical assistance if strategies funded are Title III are not effective, but does not provide what that assistance might entail. The plan does not address the CDE's capacity to provide assistance to LEAs on supporting English learners.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	CDE must 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 providing evidence-based options for direct technical assistance.