STATE PLAN
PEER REVIEW CRITERIA
Peer Review Panel Notes Template

STATE: Colorado

U.S. Department of Education
April 5, 2017

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

A.1: Challenging State Academic Standards and Assessments

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

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

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

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

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

	Peer Response
Peer Analysis	The SEA provided information about its strategies to provide all students in the State the opportunity to be prepared for and take advanced mathematics coursework in middle school. Public feedback was sought about this exception and a waiver will be sought to expand this to 7th grade. Evidence was provided about the responsibility of the School Board to develop programs of study, individual career and academic plans (ICAP). While ICAP plans may include language about HS assessments that meet some requirements, it is not spelled out.
Strengths	Public outreach indicated high support for this initiative and the intention to apply for a waiver in order to expand the benefit to 7th grade students as well. • Public feedback was sought about this exception and a waiver will be sought to expand this to 7th grade. • Evidence was provided about the responsibility of the School Board to develop programs of study, individual career and academic plans (ICAP).

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

	CO details policies and procedures to facilitate the opportunity for students to take advanced coursework in middle school. It is included in statutory language.
Weaknesses	While ICAP plans may include language about HS assessments that meet some requirements, it is not spelled out.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA needs to ensure that middle school students are required to take course-aligned mathematics assessments.

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

A.3.i: Definition

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

	Peer Response
Peer Analysis	The SEA states that Spanish is the sole language that meets its definition, but does not provide statewide data on the prevalence of Spanish or its other non-English languages. Other than Spanish, three languages met or surpassed the 5% threshold at the local level, and this was evident in 3 of the SEA's 178 LEAs. The languages are not indicated, but the SEA states that translating assessments into those languages would not be practicable due to their limited presence at the SEA level.
Strengths	Clear analyses were performed on a variety of EL populations and administrative levels.
Weaknesses	District-level data for the three districts with more than 5% of English learners would provide helpful context to understand the actual impact.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information	

or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	It is unclear whether locally translated assessments are valid and reliable or if they are included in the Accountability system.
Strengths	
Weaknesses	It is unclear whether the locally translated assessments as referenced are translations of local assessments or of the state content assessments. The SEA needs to clarify if it ensures that locally translated assessments are valid and reliable. The SEA needs to clarify if it includes such assessments in the Accountability system.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

A.3.iii: Assessments not Available and Needed

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

	Peer Response
Peer Analysis	N/A: The SEA states that Spanish is the only non-English language that meets its definition of "present to a significant extent" and that its offerings in tested grades of Spanish trans-adapted assessments in the mathematics and science content areas fulfill these requirements.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet	

A.3.iv: Efforts to Develop Assessments

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

	Peer Response
Peer Analysis	N/A: The SEA states that Spanish is the only non-English language that meets its definition of "present to a significant extent" and that its offerings in tested grades of Spanish trans-adapted assessments in the mathematics and science content areas fulfill these requirements.
Strengths	The SEA has engaged in extensive consultation with relevant stakeholders.
Weaknesses	To ensure reliability and validity, the state could monitor the process through review of local assessments or otherwise.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

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

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

	Peer Response

Peer Analysis	The SEA lists all major racial and ethnic subgroups to be used in its Accountability system. The SEA will aggregate those groups whose n-size is otherwise too small to be counted in the system.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	CO is electing to include students of "two or more" races for accountability purposes; CO will also combines race/ethnic groups that do not meet minimum n-size. CO does combine groups that are too small to meet the minimum N, such as the combination of American Indian/Alaska Natives. SEA also says that children formerly identified as having an IEP are not included in the student with disability group; however they plan to pilot the change in upcoming years. The statute indicates that former students with disabilities are not to be included in ESSA.
Strengths	N/A
Weaknesses	N/A
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

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

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

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

	Peer Response
Peer Analysis	While the SEA meets the requirements, it would be useful to demonstrate how the state ensures uniform application across LEAs for review of the body of evidence. CO exemptions depend on the grade of the RAEL.
Strengths	The SEA provides some native language arts assessments at certain grade levels, allowing newcomers to show their knowledge in a language in which they're comfortable. 3rd and 4th grade students who receive instruction in Spanish will take Spanish Language assessment.
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

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

	Peer Response
Peer Analysis	CO has carefully considered the ramifications of minimum n, selecting 16 for achievement and 20 for growth. In cases where subgroups do not meet the minimum n, they will be placed into an aggregate non-white subgroup, in order to include more students.

	This methodology could be useful, because it may be that small schools or small subgroups will systematically be held accountable for very different criteria. However, using different minimum n-sizes can result in some schools excluding growth because the minimum n is not reached.
Strengths	
Weaknesses	The SEA does not specifically state that these n-sizes apply to each subgroup individually, although it is implied. Due to the recent changes in state assessments, the SEA used other historical data to conduct its analyses.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	Based on the reported size of many LEAs within the SEA, the n-size appears to be appropriate in terms of soundness and inclusiveness, respective to small LEA size. CO used medians so that the data were less susceptible to outliers.
Strengths	Despite its confidence in the n-size with which it was familiar, the SEA appears to have considered various larger and smaller n-sizes before deciding on continuing to apply its historical n-sizes of 16 for accountability and 20 for ACGR and growth.
Weaknesses	As noted above, different ns may lead to systematic differences based on N, which is not a school controllable characteristic. There is a lack of empirical evidence supporting the n-size. The state could provide additional information to support the n-sizes.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the	

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

specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	The SEA appears to have provided many opportunities for input on this element over time, in addition to it being a time-tested protocol in the SEA – giving stakeholders practical experience and an ability to provide valuable feedback.
Strengths	The SEA appears to have provided many opportunities for input on this element over time, in addition to it being a time-tested protocol in the SEA – giving stakeholders practical experience and an ability to provide valuable feedback. They were clear in their explanation. They build new models on old quality models. They provided rationale for their choices. They consulted with technical experts and voices from the field such as large and small districts, parents, advocacy groups, etc.
Weaknesses	None noted
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	CO ensures privacy by using the minimum ns and by using mean-scale score performance instead of percent proficient, as this increases privacy. Also, CO applies a minimum cell size of 4. CO intends to report percent proficient so the privacy benefit of using mean scale score seems to be lost.

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[3] See footnote 5 above for further guidance.

	Colorado claimed a benefit of using mean scale scores in the Accountability model; however, by reporting percent proficient, that benefit is reduced.
Strengths	The SEA indicated that it investigated multiple approaches to ensuring student privacy while maintaining a strong system of accountability. This included consultations with the Privacy Technical Assistance Center and its own Technical Advisory Panel, discussions out of which the current system arose.
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	The SEA uses three years of aggregated data when the school has too few students. They provide (using historical data) the number of student that would be excluded. Their model finds that the largest number and percentages of student excluded in the racial/ethnicity categories would occur as a result of the disaggregation of student by each major racial and ethnic category. CO is adding an additional step to the inclusion of the students from each major racial/ethnic group
Strengths	CO was aware of its limitations with its model and added an additional way to counteract it.
Weaknesses	The state does not clearly address, by indicator, the minimum n-sizes for accountability and for reporting.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The state should clearly address, by indicator, the minimum n-sizes for accountability and for reporting.

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

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

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

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

	Peer Response
Peer Analysis	One reviewer concluded that CO meets the requirement of this component and that the SEA provided information for each area of review. Other reviewers concluded that, overall, the long-term goals are ambitious. Exceptions are already-high-performing groups, such as groups already performing above the long-term goal.
Strengths	The metric appears to provide more anonymity for students in the accountability system and will be more sensitive to annual changes in scores at every level of proficiency.
Weaknesses	For some subgroups, the long-term goals appear not to be ambitious (to include some lower percentiles in six years); for others, it seems overly ambitious. Overall, it is unclear what the percentile change represents in terms of score differentials.
Did the SEA meet all requirements?	☒ Yes (1 peer reviewer) ☒ No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The state has met all of the elements with the exception of the ambitiousness of long-term goals. For subgroups already above the long-term goal, the goal should be to maintain current achievement levels.

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

➢ Does the SEA provide measurements of interim progress toward meeting the long-term goals for all students?
➢ Does the SEA provide measurements of interim progress toward meeting the long-term goals for each subgroup of students?

	Peer Response
Peer Analysis	The SEA provides measurements of interim progress for all students and each subgroup of students The SEA provided no explanation in Appendix A as to how these gains are achievable. For example, children with disabilities goes from 1st percentile in

	Year 1 to the 51st percentile in Year 2.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	The SEA has set ambitious targets for its lower achieving subgroups.
Strengths	CO provides ambitious targets to close gaps.
Weaknesses	In the application, in the section about long-term goals SEA did not address the challenge of these groups reaching these goals, nor share any analyses of the probability of reaching them.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

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

	Peer Response
Peer Analysis	

Strengths	
Weaknesses	The goals correlate to the annual increases already taking place in the SEA's ACGR, so they do not appear to be particularly "ambitious" so much as "expected". A continuous improvement goal is not in place for Asian students' graduation rates. Goals are not ambitious. The table and narrative are not aligned.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Clarity currently does not exist in the explanation around the four-year adjusted cohort graduation rate, which should be higher. The table and narrative are not aligned. Refer to pages 51 and 147.

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

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

	Peer Response
Peer Analysis	The SEA indicates that it uses five, six and seven-year ACGRs in addition to the four-year; however, both in 1.B and in Appendix A.2, it appears that only the four-year rates are provided. With no extended goals evident, it cannot be determined that these goals are more rigorous than those set for the four-year ACGR.
Strengths	
Weaknesses	It does not appear that extended ACGRs are provided in addition to the four-year ACGR. It is unclear how the extended cohorts are included in the graduation calculation.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the	The state needs to replicate the tables on page 13 and 147 for each of the

specific information or clarification that an SEA must provide to fully meet this requirement	extended cohort rates – refer to Figure 3 and Figure 44.

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

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

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

	Peer Response
Peer Analysis	The SEA provides measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate, but does not specifically speak to an extended-year adjusted cohort graduation rate for all students The SEA provide measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate, but not to any extended-year adjusted cohort graduation rate for each subgroup of students. Interim progress is indicated.
Strengths	
Weaknesses	Only four-year goals appear to be provided, and those goals do not seem to be particularly ambitious. Exactly how the extended cohorts are also included in the calculation is not clear
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The state needs to replicate the tables on page 13 and 147 for each of the interim rates – refer to Figure 3 and Figure 44.

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

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

	Peer Response
Peer Analysis	The four-year ACGR goals do appear to take the varying needs of subgroups into account and seek to reduce the statewide graduation rate gaps. However, with no extended-year ACGR available, it cannot be determined whether those same standards apply to the SEA's extended year model. Tables of interim measures for four-year adjusted cohort grad rates (inclusive of the extended adjusted cohort rates) indicate that the interim targets for Year 2 and Year 4 are the same for all subgroups of students, though of the subgroups are starting at a lower BL. Lowest graduation rate appears to be students AI/AN students at 71.4%, but interim measure is same at 85.1%/87.7%. 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 did not take into account the improvement necessary for subgroups of students who are behind in reaching those goals.
Strengths	Consistent long term goal.
Weaknesses	Lacking an extended-year measurement of interim progress model. All students and subgroups have the same interim targets at 2 and 4 years review.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Same as above.

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

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

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

	Peer Response
Peer Analysis	The SEA provides a baseline indicating the current percent of ELs meeting proficiency (12%) and a six-year goal by which time it will expect 15% of its ELs to have achieved ELP. The SEA specifies that its timeline will be student-level and that ELs entering with higher levels of initial proficiency will be expected to reach ELP more quickly than those with lower initial proficiency scores.

	Yes, includes LT Goal for increasing percentage of EL making progress (12% at BL to 15% at year 6)
Strengths	Will develop a student-level timeline for reaching proficiency and monitoring progress with revised WiDA assessment; cut scores will be aligned to greater language expectations in classrooms; may need to modify interim targets based on BL collected this year

The long term goal intends to increase the percent of students annually exiting. |
| *Weaknesses* | The SEA has not definitively determined whether additional criteria such as age and grade level will factor into the ELP timeline and, although it has provided 2016 baseline year data, the SEA states that it will "require results based on the new (2017) cut scores to make data-based decisions" on timeframes. The SEA does not provide a maximum number of years within which an EL should meet ELP. In addition, the SEA proposal addresses increasing the percentage of ELs achieving ELP – not increasing the percentage of ELs "making progress" in achieving ELP.

Will continue to review research to determine appropriate timeline

Not clear how this long-term goal relates to progress monitoring or the EL indicator |
| *Did the SEA meet all requirements?* | ☐ Yes (0 peer reviewers)
☒ No (4 peer reviewers) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | The information is not readily available in order to make a decision, and the long-term goal is not aligned with the required metric.

No timeline to proficiency is included.

SEA does not identify and describe the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency.

The SEA should provide a baseline, long-term goal, and interim goals related to improving the rate at which ELs progress along the continuum of ELP toward achievement of ELP. |

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

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

	Peer Response
Peer Analysis	The SEA's plans are to achieve incremental increases in the percentage of ELs annually achieving ELP, not annually improving the number/percent of ELs making "progress" toward ELP. The SEA plan provides for two, 2-year interim checks at which time it will expect a 1% increase (upon each check) in the percent of ELs having achieved ELP.

Interim targets are 1 increases over 2- years for a 3 % increase over the 6-year |

	period of the goal
	The SEA does 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
Strengths	Will be developing student-level timeline for reaching proficiency and monitoring progress based on revised WiDA assessment; higher cut scores to be determined
Weaknesses	The SEA plan focuses solely on increasing the number of ELs at the transition point of their language services. At the LEA level, this could reduce focus on those ELs at the lowest ELP in favor of those nearing transition. In addition, the SEA plan does not address its plans to increase ELs' progress <u>toward</u> proficiency. This measure contradicts the SEA's rationale for basing its Academic Achievement indicators on students' mean scale score (4.1).l Will be making some modifications with new assessment
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA should define progress in ELP and provide interim progress measures indicating its expectations for increasing percentage of ELS who annually or bi-annually progress in their ELPs.

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

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

A.4.iv.a: Academic Achievement

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

	Peer Response
Peer Analysis	For Academic Achievement accountability, the SEA proposes to use the mean scale score from its state-required ELA, mathematics and science assessments for all students in 3rd through 11th grade. This includes those students alternately assessed due to their significant cognitive disabilities. The SEA does not specify relative weights assigned to each of the three content areas included in this indicator, though it proposes to consider the Academic Achievement indicator weight as 35% of the overall Elementary/MS accountability system, and 30% of the High School system. The SEA's calculation, as proposed, can be disaggregated by subgroup, and for those groups not meeting the n-size, the SEA will aggregate three years' of a school's data in order to capture as many students in the system as possible. For those groups that still do not meet the n-size, the SEA proposes to combine those individual racial/ethnic groups into one "Aggregated non-White group" and if that group meets the minimum n-size, hold the school accountable for its achievement. The accountability system will include the calculation and reporting of test participation rates for all schools and disaggregated groups. However, due to state law which requires LEAs to have policies to allow parents to excuse their students from state assessments, the SEA accountability system will not include parent excusals in the denominator of these participation rate calculations

Yes, mean scale score for ELA/math/science for tested grade levels; all components addressed for Academic Achievement

The indicator measure the performance of grades 3-11 in ELA, math and science. There is also assessments available for students with cognitive disabilities. It is not stated that these assessment would meet the 95% assessed benchmark, we have to assume that is the case. |
| *Strengths* | Mean scale score has advantages over a percent benchmark – all students reflect in the accountability metrics; also used for the alternate assessment

CO has been doing these types of assessment in their previous plans for the US DOE.

CO has carefully considered and developed indicators that have either been implemented in the state previously and/or have some research support. |
| *Weaknesses* | Given the switch from proficiency to mean scale scores it would be useful to have additional information regarding properties of the mean scale scores among schools, how they will contribute to overall inferences and the extent to which variation in mean scale scores are attributable to schools.

The ELP progress indicator is based on SGPs and additional information on how mean SGPs are aligned with progress towards proficiency within a specific time period. An important question is whether SGPs based all EL progress lead to adequate progress (will the state adjust the notion of catching up to on track?   How will this be operationalized). |
| *Did the SEA meet all requirements?* | ☐ Yes (0 peer reviewers)
☒ No (4 peer reviewers) |
| *If no, describe the* | Weighting of reading/language arts achievement relative to mathematics |

specific information or clarification that an SEA must provide to fully meet this requirement	achievement is required and is not explicitly noted. The statute should be reviewed for requirements related to weighting.
	Science cannot be included as a weighted measure in academic achievement.
	It is not stated specifically that the state assesses 95% of students. The testing opt-out option allows students to be lost in the accountability system. Both of these issues need to be addressed.

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

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

- ➢ Does the SEA describe the Other Academic indicator used in its statewide accountability system for public elementary and secondary schools that are not high schools, including that the SEA uses the same indicator and calculates it in the same way for all elementary and secondary schools that are not high schools, in all LEAs, across the State, except that the indicator may vary by each grade span?
- ➢ Does the SEA describe, if applicable, how it averages data across years and/or grades (*e.g.*, does the State use a uniform averaging procedure across all schools)?
- ➢ If the SEA uses a different indicator for each grade span, does it describe each indicator, including the grade span to which it applies?
- ➢ If the Other Academic indicator is not a measure of student growth, is the indicator another valid and reliable statewide academic indicator?
- ➢ If the Other Academic indicator is not a measure of student growth, does the indicator allow for meaningful differentiation in school performance?
- ➢ Can the indicator be disaggregated for each subgroup of students?

	Peer Response
Peer Analysis	The SEA proposes to use an indicator of Academic Progress in ELA and mathematics for grades 4 through 9, and as future high school assessments become aligned, to implement this at more high school grades as well. For this measure, the SEA will use median student growth percentiles, calculated using a quantile regression model. This can be disaggregated for each subgroup and will carry a weight in 2018 of 60% in the elementary and middle school accountability systems, and 40% at the high school level.
	CO is using student growth as another academic indicator across elementary and secondary schools, and the SEA will have the high school state assessment when the aligned system is fully implemented; median student growth percentile; yes, uniform system used across all schools
	This indicator can be disaggregated for each subgroup of students.
Strengths	The goal of including this indicator at the high school level indicates a willingness to encourage continuous improvement and growth in the higher grades, as opposed to a singular focus on graduation rate.
	Has used this metric for many years: uses quantile regression model;

	Chronic absenteeism is research based and easy to obtain
	CO describes the use, reasoning and support for using chronic absenteeism
Weaknesses	Reliability checks to ensure accurate attendance practices must be in place in all schools.
	CO is considering other indicators as well but it is not clear specifically how these will be incorporated.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

A.4.iv.c: Graduation Rate

Does the SEA describe the Graduation Rate indicator used in its statewide accountability system for public high schools in the State, including that the SEA uses the same indicator across all LEAs in the State?

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

	Peer Response
Peer Analysis	The SEA includes all of its schools in its graduation rate calculations. It does not indicate whether it will choose to lag ACGR data. Like its Academic Accountability goals, the Graduation Rate long-term goal is set at 6 years with two, 2 year interim checks using an n-size of 16 (as with other Academic indicators). The SEA uses the four-year cohort graduation rate in its calculations in addition to the five, six- and seven-year extended ACGR. The indicator can be disaggregated by student subgroup. It is not specified what weight the Graduation Rate indicator will carry in the Accountability system (p.62).

Strengths	The SEA explains the use of the 4 year and extended graduation rates and is consistent with what CO has done previously.
Weaknesses	No description is provided related to how extended-year graduation rate is included in the ACGR by the SEA, or the weight of graduation weight in the Accountability system as a whole. Though the SEA indicates that an alternate assessment is used for students with severe cognitive disabilities, it is unclear how the graduation rates of these students fit within the SEA's accountability system. Impact of the extended year rates would be useful as would analysis of whether extended graduation rate credit reduces the likelihood that students exit in 4 years.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	It is unclear whether the indicator is based solely on the four-year adjusted cohort graduation rate and the description does not include how the four-year adjusted cohort graduation rate is combined with that rate or rates within the indicator. In addition, in other accountability areas with n-size=16, the SEA specifically states it will aggregate three years of data; however, this is not noted for graduation rate calculations.

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

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

	Peer Response
Peer Analysis	The SEA indicates that it will use the median student growth percentile, as it does for its Academic Growth measure, to determine progress in ELP. This indicator will apply to 1st through 12th grade and will be reported as school-level medians for inclusion in the accountability calculations. The state long-term timeframe is 6 years, as it is for all other accountability measures. The SEA intends to include an additional metric in its Accountability system in which it also gauges the proportion of ELs on track to attaining fluency. The SEA uses the same student growth model for EL proficiency as for ELA/math; student growth percentiles are calculated for the 1st through 12th grades and reported as school level medians for accountability;
Strengths	The SEA appears to be including two ELP metrics, thus it is committing to hold both schools and LEAs accountable for both progress and attainment of

	proficiency. Will also begin to use another metric looking at the proportion of EL students who are 'on-track' to reach fluency within the state timeframe; will take into account students' age, grade and other factors
Weaknesses	The SEA did not provide any specifics or interim measures for the "on track to attaining fluency" metric, which appears to be the metric most correlated to the requirement of "progress toward attaining proficiency". The SEA does not include its definition of English language proficiency, based on the State English language proficiency assessment
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA describes the calculation for growth but not does describe how growth is used to create the indicator used in its statewide accountability system. Interim growth targets are not included, nor is a process outlined to create such a measure and as such, the indicator cannot be deemed either valid or reliable. The SEA's description does not include the State's definition of English language proficiency .Because the indicator is not defined, it cannot be aligned with the State-determined timeline.

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

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

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

	Peer Response
Peer Analysis	The SEA intends to use Student Engagement (as measured by Reduction in Chronic Absenteeism) for its Elementary and Middle Schools. The SEA defines chronic absenteeism as the unduplicated count of K-12 students absent 10 percent or more of the days enrolled during the school year. These data are disaggregated by school, gender, race/ethnicity, special education, EL and homeless. In 2018, Economically Disadvantaged (ED) will also be a disaggregation. The SEA does not specify which elementary and middle

	school grades will be included in this metric (or if all will be). The indicator appears to be valid and reliable, is based on research to impact achievement and it does allow for meaningful differentiation between schools and LEAs. High School engagement will be measured by a Reduction in Dropout Rates. The SEA defines dropout rate as the percentage of all students enrolled in 7th to 12th grades who leave school during a single year, without enrolling in another school. The SEA does not specify which (or if all) high school grades are to be included in this metric. The data appear to be gathered reliably and validly and there is a research-basic provided for this element. For elementary and middle schools, the SEA will use chronic absenteeism as a measure of student engagement; they are targeting a reduction in absenteeism; for high schools the indicator is dropout rates and is defined as an annual rate, reflecting the % of all students enrolled 7-12 grades who leave school during a single school year and do not enroll elsewhere; calculation involves dividing the number of dropouts by a membership base and excludes expelled students
Strengths	The School Quality indicator selected by the SEA is reflective of student engagement and participation in school, and the indicators are collected for years beyond what is necessary for accountability purposes, which is valuable for school improvement outside of the accountability requirements. Data is currently collected and can be reported for all and disaggregated; free and reduced-lunch status will be incorporated in 2018; definition of chronic absenteeism is absence for more than 10% of enrolled days of the school year (unduplicated) for any reason; dropout data is currently being collected and has been for some time.
Weaknesses	The SEA should give specifics regarding the years in each grade span that will be held accountable to these School Quality indicators.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA describes each indicator, including the grade span to which it applies. However, it is unclear if the chronic absenteeism indicator will be included in the accountability system for those non-tested grades (K-2) for which data are being gathered. In addition, the SEA should indicate whether it defines for LEAs a "full school day" for attendance purposes, because if LEAs have differing definitions, this can affect performance ratings. Due to its being a lower-incidence indicator, the comparability and reliability of dropout rates is questionable as in a school accountability system, and evidence is needed in this area.

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

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

➢ Does the SEA describe its system of meaningfully differentiating, on an annual basis, all public schools in the State?
➢ Is the State's system of annual meaningful differentiation based on all indicators in the State's accountability system?

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

	Peer Response
Peer Analysis	The SEA describes its system of AMD as including all public schools, including charter schools, apart from those that consist of grade spans below the tested grades. The system is comprised of a percentile ranking distribution with cut scores at the 15th, 50th and 85th percentile – resulting in 4 bands. Points are assigned to each performance band – better scores result in more points. A normative methodology would ensure that the measures are identifying comparable proportions of the population of school for each performance band. The points would then be aggregated to arrive at a total school along the ranking and this would be used to differentiate schools. The system does not specify that either Graduation Rate or Progress in ELP is included in these ranking calculations. The SEA has developed a comprehensive system to differentiate the needs of schools and districts and provide differentiated support; system is called System of Performance Management (SPM); has continuous process with applications/plans for implementation, monitoring, technical support and evaluation; within system has three tiers of support (universal, targeted and intensive); initial plan review is differentiated for small schools and for districts with low performing schools; will use a percentile ranking distribution of school outcomes for all schools in the state (there are exceptions); performance bands are determined with cut scores at the 15th, 50th and 85th percentiles; better scores equal better performance of schools; measure points are aggregated for indicator totals, then are weighted to provide overall score. This method does distinguish between higher and lower performing schools
Strengths	The SEA wants all student to have access to 1) rigorous standards and aligned curriculum 2) meaningful assessments 3) skilled teachers who have needed supports and 4) an accountability system for schools and districts. Alternative Education Campuses may require some supplementary steps to ensure differentiation is possible The system weights academic performance and growth quite substantially. On those indicators that the SEA does include in its accountability system, the performance of all students and each subgroup of students is included.
Weaknesses	The system does not specifically address every indicator in the SEA accountability system. It is not clear where ELP progress is included.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA does not include all the indicators of annual meaningful differentiation in the State's accountability system. Specifically missing is the ELP indicator; it is unclear if graduation rate is included as an indicator.

A.4.v.b: Weighting of Indicators

➢ Does the SEA describe the weighting of each indicator in its system of annual meaningful differentiation, including how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students (*e.g.*, for the Progress in Achieving English Language Proficiency indicator)?

➢ Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators each receive substantial weight individually?

➢ Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators receive, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate?

	Peer Response
Peer Analysis	The SEA provides weights for Academic Achievement (35% - Elem/MS; 30% HS), Growth (60% - Elem/MS; 40% HS) and School Quality (5% - Elem/MS; 30% HS), but does not provide the weights for either the Graduation Rate or Progress in ELP indicators in the system. It is difficult to determine how much weight each individual indicator receives in this system. The weight for the Other school indicator in grades 3-8 may be too little to meaningfully contribute to the system as a whole.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	No calculations are provided for situations in which an indicator cannot be calculated due to a low n-size. The SEA does not provide weights for Graduation Rate and Progress in ELP, so no determination can be made regarding whether they are substantive weights or not.

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

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

➢ Does the SEA's description of a different methodology indicate the type(s) of schools to which it applies?

	Peer Response
Peer Analysis	The SEA has Alternative Education Campuses that will be included in the main accountability system, but if it is determined that they are not meaningfully differentiated, the SEA will implement an AEC-specific system of measures to differentiate them into either Comprehensive, Targeted or "neither" category. Included in this specialized system would be elements such as local assessments of achievement and progress, high school

	completion rates, attendance and truancy rates. Alternative Education Campuses may need supplementary steps to make sure differentiation is possible (would be measures to further differentiate them into Comprehensive or Targeted Support and include achievement measures relevant to AEC programs); if no grade level is assessed in a school it would be identified as "neither", as requirements are not applicable; schools with variant grades will be included in the differentiation system; small schools with total number of students less than the minimum n-size will be identified as 'neither' since the requirements for identifying are not available, if the schools do not meet the minimum n-size based on three years of data
Strengths	The SEA has selected elements that appear to be appropriate and specifically targeted to the type of schools that would fail to be differentiated in its overall system. The SEA did take into consideration small schools and alternate schools as well as schools serving grades P-2.
Weaknesses	No specific measures or weights were provided to illuminate how the SEA's novel accountability system would be applied to the 'special population' AEC schools. The concepts were described but not fleshed out with details. P-2 schools seem simply to be excluded from receiving designations.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA needs to provide clarification on its methodology and how comprehensive and targeted support designations will be applied in schools designed to serve special populations.

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

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

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

	Peer Response
Peer Analysis	The SEA proposes to annually rank all of its schools, from highest to lowest, based on the total percentage of points earned on its statewide accountability system. Those Title I schools with the lowest total points earned will be identified as the lowest-performing schools for Comprehensive Support and

	Improvement. This will include a minimum of 5% of all Title I schools. The identification will be based on two years of data and the first schools will be identified in August 2017. In subsequent years, three years of data will be used for this identification process. Using state summative rating for meaningful differentiation of schools, CO will annually rank all schools based on total percentage of points; lowest 5% of this list will be identified as the lowest performing; schools identified every August based on data from the previous three years; first cohort of Comprehensive schools will occur in 2017-18 based on two years of data
Strengths	Identifications will begin in 2017-18. The SEA annually evaluates data from the previous three years to determine whether a school falls in the bottom 5 percent.
Weaknesses	The SEA uses different vocabulary in different sections in terms of points earned, or percentage of points earned which all likely lead to the same conclusions but is somewhat unclear as to what the actual metric is.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	The SEA indicates that it will annually identify all public high schools, including Alternative Education Campuses, that have a four-year-plus-extended year graduation rate below 67% as Comprehensive Support and Improvement schools. Three years of data will be used for this identification, and the first set of schools will be identified in August 2017. The SEA will annually identify all public schools with a four-year, plus the extended year, graduation rate below 67%; all will be Comprehensive support; using statewide accountability system process; for AEC high schools will also be identified; three years of data will be used in determination; identification will begin in 2017-18 and recur every August.

Strengths	The SEA is including its non-traditional high schools in this rate as well, in addition to incorporating graduation rate into their individualized accountability system. To make Comprehensive Support determinations for non-traditional high schools, the SEA uses a three-year average to calculate graduation rate.
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	The SEA proposes to identify schools as Additional Targeted Support schools should they be found to be 'chronically low-performing' in the same student subgroup. Chronically low-performing schools are Title I schools that, based on rank ordering of schools' student subgroup performance, are in the lowest-performing 5% for a particular student group. This identification process will take place annually beginning in August 2017. In the event that a school is identified for four consecutive years as Additional Targeted Support due to the consistent low-performance of a particular subgroup, if the school has not already been identified for Comprehensive Support and Improvement it will be moved to that category. This transition from Targeted to Comprehensive Support will first take place in 2020-2021. The SEA meets requirements of this section by using the same methodology to identify the lowest performing 5%. The schools will be ranked on the performance of each student subgroup; this group of schools will first be identified in 2020-2021
Strengths	Schools will receive Additional Targeted Support when a school that has not been identified as Comprehensive, but has at least one student group that performs in the lowest 5% for that particular subgroup; schools that have been identified in this category (Additional Targeted Support) for four consecutive years, but are not Comprehensive, will be moved to the Comprehensive

	Support group;
	The SEA explains how schools, after 4 years of targeted support would move into comprehensive support.
Weaknesses	Following the initial identification in 2020-2021, it is not clear how often the SEA will make these transition decisions for schools to move from Additional Targeted to Comprehensive in the "chronically low-performing" subgroup category.
Did the SEA meet all requirements?	☒ Yes (1 peer reviewer) ☒ No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA does not specify that reviews for this element will be performed annually.

A.4.vi.d: Frequency of Identification

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

	Peer Response
Peer Analysis	The SEA indicates that it will identify schools for Comprehensive Support and Improvement as well as Targeted Support and Improvement annually in August. The SEA will identify these schools annually; every August
Strengths	The SEA will evaluate schools for status annually and schools in comprehensive support must stay in for 3 years before determining whether they meet exit criteria
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

➤ Does the SEA identify these schools annually?

	Peer Response
Peer Analysis	The SEA describes the accountability indicators that it will use in determining which schools will be considered "Targeted Support" schools due to their subgroups' consistent underperformance. The indicators proposed are: ELA achievement, ELA growth, Math achievement, Math growth, Graduation Rates (for high school) and the School Quality and Progress in ELP indicators (for ELs) when available. In the SEA's system, each of the federally-required student groups will earn a rating for each of the stated indicators. The SEA defines 'consistently underperforming' as a student group earning the lowest rating on at least 3 indicators, based on aggregated three-year performance. (The n-size must be met: 16 for achievement, 20 for growth – with ELP and Graduation Rate considered in the achievement category for n-size.) The School Quality indicator's n-size remains TBD. The first schools will be identified in August, 2017 based on two years of data, due to recent assessment transitions; in future years, however, three years of data will be used during these annual identifications. The SEA will use ELA/Math/ELP data for annual evaluation of the performance of disaggregated groups; each of the student subgroups earns a rating for each specific measure; Consistently underperforming is defined as a 'given student group earning the lowest rating on at least three indicators based on aggregated 3-year performance; this identification will begin in 2017-18 and occur in August; however in 2017-18 only two years of data will be used due to assessment transition
Strengths	The SEA clearly identifies how consistently underperforming is defined.
Weaknesses	Impact data would be useful to examine the likelihood and type of school meeting the criteria. Generally, conjunctive rules with low probability are very unlikely to occur.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

➤ Does the SEA describe its methodology to identify schools in which the performance of any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State's methodology under ESEA section 1111(c)(4)(D) (*i.e.*, the methodology described above in A.4.vi.a), including: 1) whether the methodology identifies these schools from among all public

schools in the State or from among only the schools identified as schools with one or more
consistently underperforming subgroups and 2) if applicable, how the SEA averages data (*e.g.*, does
the State use a uniform averaging procedure across all schools)?
- ➢ Does the SEA's methodology result in identification of such schools?
- ➢ Does the SEA include the year in which the State will first identify such schools (*i.e.*, does the
  timeline comply with the Department's guidance)?
- ➢ Does the SEA include the frequency with which the State will identify such schools after the first year
  of identification?

	Peer Response
Peer Analysis	The SEA will annually rank schools based on the performance of each student subgroup, using the same methodology as performed for the "lowest performing schools" indicator. If a school is NOT identified for Comprehensive Support but has at least one subgroup performing in the lowest 5 percent for that student group it will be identified for Additional Targeted Support. This will take place annually, beginning in August 2017. It will use two years of data in the initial calculation due to a recent assessment transition, but in the future, will use three years of data for this calculation. Will use the same methodology that is used for determining the lowest performing 5 % of Title I schools; schools will be ranked based on the performance of each student subgroup, when schools have NOT been identified as Comprehensive BUT have at least one student group that performs in the lowest 5% for the student group. Will begin in the 2017-18 school and then each August: will begin with two years of data due to assessment transition.
Strengths	Following similar methodology as Comprehensive; consistency; exit criteria for Additional Targeted Support is defined as schools that no longer meet criteria after the third year; may revise this timeline based on data The SEA describes a methodology that selects from all non-comprehensive schools. The methodology selects from the performance of subgroups that places them in the bottom 5% in the state in the same manner as for comprehensive support.
Weaknesses	Based on the SEA's description, it is not clear whether Progress in ELP indicator will be included in these calculations. It is not clear whether the different methods create additive lists (i.e. each provide 5%) or if schools selected on different methods contribute to both. No impact data was presented that demonstrates the types of schools identified with each method.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA must consider how the Progress in ELP indicator is included in these calculations.

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

	Peer Response
Peer Analysis	N/A
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

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

	Peer Response
Peer Analysis	The accountability system will include the calculation and reporting of test participation rates in ELA and Mathematics for all schools and disaggregated groups. However, due to state law which requires LEAs to have policies allowing parents to excuse their students from state assessments, the SEA accountability system will not include parent excusals in the denominator of these participation rate calculations. Schools with calculated participation rates below 95% will develop improvement plans, will be provided with information to share with their community about the purposes and uses of state assessments and, if identified for comprehensive or targeted support, will have that rate included in their ESSA Program Reviews. The SEA will report assessment participation rates and assessment results for all schools and district and disaggregated groups; have schools address participation if below 95% as part of improvement plan; include low accountability participation as an indicator in ESSA program reviews; help schools and districts with low participation provide information to parents and communities about the reasons for statewide assessment and accountability; participation rates for schools/districts/subgroups removes parent excusals from the denominator; state law passed that shall not hold schools liable for parent choices.

Strengths	
Weaknesses	Due to removing from the calculation denominator students whose parents excused them from state testing, the SEA is not effectively holding schools accountable for the test participation of their full student body. State law prohibits LEAs from coercing parents and students to participate in statewide assessment so it is impossible to guarantee compliance with 95% tested requirement; this law may impact the SEA from meeting its required 95 % participation rate. The SEA has indicated that failing to meet the 95% participation rate would not directly impact school performance, although a school in this situation would be required to address its participation rate in the school plan. State law prohibits the SEA from holding schools liable for parent choices.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Similar to a prior reference, greater clarification is needed on the opt-out provision, the rate at which students opt out of state assessments, and the manner in which LEAs and schools will be held accountable for student participation in such a state assessment system.

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

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

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

	Peer Response
Peer Analysis	The SEA indicates that schools identified for Comprehensive Support will remain on that list for 3 years and that, after that third year, if the school no longer meets the identification criteria that resulted in its being identified for Comprehensive status, it will be exited from that status. Comprehensive Support exit criteria are uniform for each type of Comprehensive Support school – this criteria is that the school will no longer be considered as Comprehensive if, after three years, it no longer meets the criteria under which it was originally identified.

	The SEA states that once identified for Comprehensive Support and Improvement, the school will remain on the list for 3 years. The uniform exit criteria for each type of Comprehensive Support and Improvement is that the school will no longer meet the identification criteria that resulted in its being identified for Comprehensive Support and Improvement.
Strengths	Schools need to maintain the improvement; a school will remain on the list for three years and this allows time for implementation and change. The SEA has specific exit criteria and includes number of years (3). Exit criteria are defined as no longer meeting the entrance criteria for this indicator.
Weaknesses	There seems to be no provision for a school to exit early (given the use of multiple years of data, a stable estimate of improvement before 3 years.) If schools can enter each year, but only exit after 3 years, there is likely to be a build-up of comprehensive support schools.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	The SEA indicates that schools identified for Additional Targeted Support that no longer meet the identification criteria after the third year will be exited from that status. The SEA states that it will monitor this process and may revisit this timeline when it has additional data collected on school performance for schools having been in this status. The exit criteria for Additional Target Support schools is uniform and is defined as "school no longer meets the identification criteria after the third year".

	The uniform exit criteria for Additional Targeted Support is that schools no longer meet the identification criteria after the third year.
Strengths	Same timeline as Comprehensive; will revisit this timeline after three years of data and may revise after reviewing and evaluating the amount of time it takes to support these schools to change. Exit criteria are consistent with entrance criteria.
Weaknesses	The connection to long-term goals and subgroup reduction is unclear.
Did the SEA meet all requirements?	☒ Yes (3 peer reviewers) ☒ No (1 peer reviewer)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA must provide evidence that meeting the exit criteria is a result of closing subgroup performance gaps.

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

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

	Peer Response
Peer Analysis	The SEA has determined that more rigorous interventions should be put in place for those schools that have been identified as Comprehensive Support but were unable to exit that status after 3 years. The variety of interventions that LEAs might consider for such a school are: management partnerships with outside entities, conversion to a charter school, school closure, increased school autonomy through LEA or SEA waivers, among other (unnamed) more rigorous improvement strategies. If school does not meet exit criteria within three years, more rigorous strategies will need to be implemented; may be management support/conversion to charter school/school closure The SEA does describe more rigorous State determined actions on pp. 71 and 72.
Strengths	The SEA has developed documents to guide and assist LEAs in selecting and implementing their intervention of choice for their schools in this situation. Will utilize decision tree: past and existing supports/outcomes/local context and community involvement/independent State Review Panel/State Board of Education recommendations; the SEA has developed guidance documents related to this situation The SEA outlines several options if a school does not meet the exit criteria after three years

Weaknesses	The options appear to be a list of options with no underlying linkages as to what failed to improve over the three years in status. While there is a rubric for districts to use, it is not clear whether districts alone have the ability to make the selection.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	The SEA states that it will establish annual cycles of evaluation of LEAs' strategic allocation of resources and allocation of title program funds. The SEA will also analyze the supports implemented on behalf of Comprehensive and Targeted schools and the effectiveness of those supports. The SEA will pay particular attention to ensuring that the reviews undertaken have geographic representation as well as targets LEAs with a high number or high proportion of identified schools. Annual cycles of evaluation of strategic resource allocation, including the use of 1003 improvement funds. The SEA will establish annual cycles to review this work. It will look at budget, spending, geographic representation and the number of schools identified as needing support.
Strengths	The SEA's application for consolidated funds includes a requirement that LEAs describe their own processes of approving, monitoring and adjusting (as necessary) improvement plans for their schools identified for Comprehensive or Targeted Support. Additional technical assistance, including financial and other resource reviews, is provided by the SEA to LEAs with identified Comprehensive Support schools. Such additional assistance is offered to LEAs with Targeted Assistance schools, and is provided at the LEA's request.
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (2 peer reviewers) ☒ No (2 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet	The SEA indicates that it will establish a plan and identifies some aspects to which LEAs are supposed to attend, but the monitoring plan needs to indicate specifically what it intends to monitor with respect to resource allocation.

| | this requirement | |

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

➢ Does the SEA describe the technical assistance that it will provide to each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement?
➢ Is the technical assistance likely to improve student outcomes by, for example, 1) identifying State-approved evidence-based interventions; 2) supporting LEAs and schools in the development and implementation of support and improvement plans; and 3) differentiating the technical assistance?

	Peer Response
Peer Analysis	The SEA proposes to develop and enhance existing technical assistance strategies for those LEAs that are serving Comprehensive and Targeted schools, such as needs analyses and diagnostic opportunities, improvement planning processes, performance management tools and processes; community engagement; differentiated support for each school's unique context; high-quality professional learning and partnership with expert organizations; evidence-based strategies; and cycles of reflection, analysis and planning. The SEA list of interventions is intended to offer support to the range of needs in identified schools.

The SEA describes 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.

The technical assistance is likely to improve student outcomes by allowing LEAs to make selections of interventions that they deem most appropriate for the context of their schools. In addition, the SEA plans to allow the list to evolve over time, incorporating new research on effective strategies as it becomes available.

The SEA meets these requirements; the SEA's consolidated plan asks for LEAs to describe their evaluation process for approving and monitoring school improvement plans. |
| *Strengths* | The list produced by the SEA will not be a required list, but instead used as a reference or resource, allowing LEAs to make selections of interventions that they deem most appropriate for the context of their schools. In addition, the SEA plans to allow the list to evolve over time, incorporating new research on effective strategies as it becomes available.

The SEA provides a very comprehensive set of strategies to improve schools. |
| *Weaknesses* | This plan does not seem to address districts that are entrenched in poor practices.

Additional thought about implementation fidelity would be useful. |
| *Did the SEA meet all requirements?* | ☒ Yes (4 peer reviewers)
☐ No (0 peer reviewers) |
| *If no, describe the specific information* | |

or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	The SEA describes 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. If an LEA has multiple schools in Comprehensive Support, TA will be provided in the writing of improvement plans and analyses of financial and other resources; other schools can request this type of support; the SEA will use data from LEA about how it monitors the performance of school improvement plans. The SEA does describe more rigorous interventions such as management partnerships, conversion to Charter Schools, etc.
Strengths	The SEA has developed a universal support plan with tiered support that aligns with district needs and context.
Weaknesses	Evaluation is part of the SEA's system and closer or more explicit alignment with the accountability system and its components as evaluation indicators (and to validate whether the indicators are sensitive to improvement) would be useful.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

- Does the SEA describe the extent, if any, that minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers?
- Does the SEA describe the measures (*e.g.*, data used to calculate the disproportionate rates) that it will use to evaluate and publicly report its progress with respect to how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers?[4]

	Peer Response
Peer Analysis	The SEA provides its definitions for out-of-field, inexperienced and ineffective. It uses teacher evaluations, number of years teaching experience and certification or training as data by which to identify educators as out-of-field, inexperienced or ineffective. Low-income and minority students were identified based on respective quartiles at the school level. The SEA also describes the rates at and extent to which low-income and minority students are taught by inexperienced, out-of-field and ineffective teachers. The SEA data shows that **non**-migrant and **non**-low income students are disproportionally served by out-of-field teachers; however, migrant and low-income students are disproportionately served (with approx. 6% difference) by inexperienced and ineffective teachers. The data is gathered in the annual Human Resources data submitted by LEAs in the middle of the school year and the SEA reports the data publicly the following school year. The SEA has provided information and description of rates and differences in rates in which low income students and minority students are taught by ineffective or out of field or inexperienced teachers. These rates are higher than for non-minority/non low income students. The rates are based upon HR data submitted by LEA and school level data on student demographics.
Strengths	The SEA recognizes that in order to be of use to LEAs, the data on teacher equity needs to be in the hands of districts earlier than it is currently provided. The SEA has plans on collecting feedback and modifying the data gathering and reporting procedure to improve communications and support on this matter. The SEA will be using the Teacher Student Data Link in future to assist with data The SEA provides a good set of definitions and analyses with available data to demonstrate gaps.
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully	

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

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

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

	Peer Response
Peer Analysis	The SEA's Dropout Prevention Framework indicates a need to focus on out-of-school suspensions as a possible trigger for increasing a student's dropout potential, but other elements of this indicator do not appear to be addressed. The SEA is electing to use funds for reducing bullying and harassment and to focus on reducing discipline practices that remove students from the classroom, to improve student learning conditions; will collaborate across agency and partners to identify resources
Strengths	The SEA does recognize that it needs to address these issues related to school conditions.
Weaknesses	
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	More details are needed, including on best practices to be used in improving school conditions. Descriptions of supports provided to LEAs in an effort to reduce bullying and harassment, specified discipline practices or aversive behavioral interventions did not surface in this review. The application does say it will support schools, the "how" is not specifically included when this specific language is used. The SEA could provide additional detail besides pointing towards research based practices as these do not automatically engender change without careful implementation.

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

➢ Does the SEA describe how it will support LEAs receiving assistance under Title I, Part A in meeting the needs of students at all levels of schooling (particularly students in the middle grades and high school)?
➢ Does the SEA's description include how it will work with LEAs to provide effective transitions of students to middle grades and high school to decrease the risk of students dropping out?

	Peer Response
Peer Analysis	The SEA has 4 overarching goals in its mission: early learning (PreK – 3rd grade), grade level literacy by 3rd grade, all students meeting/exceeding academic standards and all students graduating from high school college or career-ready. The SEA provides descriptions of a number of initiatives it is implementing to these ends, such as supports, standards development, organizational alignment and data gathering at the early childhood education level as well as state-funded literacy grants and trainings for early elementary educators. Additional supports are provided in the form of resources and technical assistance on appropriate teaching and assessment practices. Federal funds are leveraged in another literacy grant that expands those K-3 literacy programs that prove successful into the 4th – 6th grades.
	Though middle school grades are not specifically discussed, supports at the high school level appear to target dropout prevention and student re-engagement programs. Strategies and practices in the SEA's "Dropout Prevention Framework" focus on data analysis leading to transition planning, supports and interventions, with 9th grade receiving particular attention. The Framework also provides particular focus on chronic absenteeism and discipline – out-of-school suspensions, specifically - as they are found to have predictive value to the dropout rate. Coordinated with this Framework is a 'Re-engagement Network' - a statewide effort to share best-practices, guidelines and procedures with the ultimate goal being a reduction in dropout rates.
	Aside from the general reference to "transition planning and support" provided the Dropout Prevention Framework, the SEA does not include elements related specifically to middle school transitions and supports. The high school dropout prevention initiative appears to be considered, practical and evidence-based.
	There was evidence of alignment of programs within the SEA to provide greater coherence in policies; the SEA identified 4 key areas to help support transitions for students (ECE, district to district transitions, HS and post-secondary, exceptional students including gifted and talented)
	Early Childhood: professional development system; alignment school readiness
	District to District: mobility rates increasing and affect graduation rates; initiated a project specifically to assist this issue; resources to support all transitions
	HS and Post-secondary: dropout prevention and re-engagement; CTE and alignment with WIOA
	Exceptional Students: gifted and with a disability; parent partnership
	The SEA describes how it will support LEAs receiving assistance under Title I, Part A in meeting the needs of students at the high school level (early warning, college readiness, etc.) of schooling. Drop out support is offered and information about students who change schools at non-traditional times. This reviewer was unable to locate information about transition supports for students moving from elementary to middle school.
Strengths	The SEA appears to be in the process of closely aligning its Pre-K and K-12 programs, with a strong focus on literacy initiatives that are supported in a variety of ways

	Core values: access to rigorous curriculum, research-based instruction; effective universal instruction, intervening early; collaboration; transitions for students in foster care is called out
Weaknesses	
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Information about Elementary to Middle School transitions was not found and the SEA does not provide information on any programs or efforts at the middle school level, related either to general supports or to dropout prevention programs. In addition, intermediate goals for monitoring these transitions could be made more explicit.

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

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

➢ Does the SEA describe how it will establish and implement, with timely and meaningful consultation with LEAs representing the geographic diversity of the State, standardized statewide entrance and exit procedures for English learners, including a description of how, if applicable, a State will ensure that local input included in the exit procedures, such as teacher input or a portfolio, will be applied statewide?

➢ Does the SEA's description include an assurance that all students who may be English learners are assessed for such status within 30 days of enrollment in a school in the State?

	Peer Response
Peer Analysis	The SEA provides reference to its online posted entrance and exit procedures and criteria, indicating that the procedures will not change for the 2017-2018 school year. Entrance procedures include a required administration of a Home Language Survey, specifics on the screeners to use for initial placement decision making, and guidance on the SEA's requirement that a "body of evidence" be amassed when finalizing both entrance and exit decisions. This body of evidence includes options to consider student work, observation protocols, and state and local assessment scores, among other things. The SEA guidebook indicates that "Districts must develop a standardized process and criteria for further investigation and confirmation of a student's ability to meet grade level performance expectations." The evidence must be aligned to content and language standards. The entrance screening protocol as described in the EL Guidebook is required within 30 days of enrollment. The SEA procedures for exiting an EL from being so designated involve a review of the student's ACCESS test scores to meet a state –set minimum criteria. Meeting these criteria then prompts further review at the local level whereby teachers and parents consider the student's work and, based on set procedural rules, determine whether the student is performing on grade-level and capable of exiting language support services. The procedure is standardized, though the documents to be reviewed may not be.

	The SEA does assess students who may be ELs within 30 days of enrollment or two weeks of arrival if enrolled after the first 30 days of school. There appeared to be strong stakeholder engagement to provide feedback regarding the EL program and entrance/exit criteria. The SEA allows for local level decisions for students, and new cut scores will be aligned to increased language expectations across the curriculum.
Strengths	The SEA has developed a strong, student-centered exiting process that involves stakeholders and moves beyond reliance upon a single, high-stakes test score for placement decisions. The SEA believes that classification determinations can be significant in education of students; it recognizes the impact of prolonged EL identification; it will use new WiDA screener for 2017-18, though the entrance procedures will remain the same. The SEA will be reviewing research on EL acquisition timelines in order to determine if the SEA needs to make any adjustments. The SEA provides significant rationale for its procedures.
Weaknesses	
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☒ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	It is unclear whether the entrance procedures established are standardized statewide, since the SEA ELD guidebook indicates that it is the LEAs themselves that establish their EL placement procedures. (ELD Guidebook, p.26) In addition, the SEA must provide exit procedures that are consistently applied to all EL students. These exit procedures must be reliable and accurate across the state in reflecting a student's proficiency in academic English.

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

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

➢ Does the SEA describe how it will assist eligible entities in helping to ensure that English learners meet challenging State academic standards?

	Peer Response
Peer Analysis	The SEA describes a variety of ways that it provides a statewide system of EL-related supports to its LEAs via professional learning, stakeholder engagement opportunities and resource provisions. The SEA describes on-demand opportunities for webinars as well as its onsite, specialized district/school specific PL offerings. Regional meetings with LEA coordinators along with stakeholder meetings that include LEA staff as well as bilingual staff, representatives from higher education and the state TESOL affiliate provide additional venues to give and receive updates on EL topics. Additional supports include a variety of tools developed and offered by the SEA to guide LEAs in analyzing their EL data, rubrics to assist LEAs in evaluating and improving their language programs and services, and at LEAs' request,

	targeted reviews of their basic ESOL programming can be conducted by the SEA. Professional learning opportunities, collaboration/networking/regional meetings, SEA-developed resources, including guidebooks and rubrics; partnership with special education unit for dually identified students The ELD guidebook developed by the SEA appears to be the way the state has addressed these indicators.
Strengths	The SEA has a wide variety of professional learning options as well as tools and guidance to allow LEAs to engage with the data and select resources and supports that best apply to their individualized context. The state's English Language Proficiency Act provides supplemental grants to support districts and schools serving increasing numbers of ELs; there exists a statewide professional development plan; cross-unit support teams are embedded with ELD specialists; the SEA performs a regular review of ELP standards every 6 years. The SEA provides a host of tools and rubrics to support many facets of EL education.
Weaknesses	As the SEA has indicated, it has yet to set its number of years in which ELs are expected to reach proficiency (p.121) and the interim goals during which ELs will progress toward proficiency; the supports described here address those elements in a more general sense. Information on, or monitoring of, how much the tools and rubrics are implemented would provide some evidence of usefulness.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

E.3: Monitoring and Technical Assistance (ESEA section 3113(b)(8))
- ➤ Does the SEA describe how it will monitor the progress of each eligible entity receiving a Title III, Part A subgrant in helping English learners achieve English language proficiency?
- ➤ Does the SEA describe the steps it will take to further assist eligible entities if the strategies funded under Title III, Part A are not effective, such as by providing technical assistance and support on how to modify such strategies?

	Peer Response
Peer Analysis	The SEA describes its process of monitoring beginning with receipt and review of the LEA application for Title III funds. The application requires LEAs to correlate activities with expected impacts, and those LEAs who fail to

achieve their stated impacts for 3 years will be reviewed be the SEA to determine whether the activity should continue or if funds should be restricted for that activity. General Title III program monitoring protocols have not yet been completed in order to fully align with the ESSA, however it is anticipated that they will include components related to supplement, not supplant, method and effectiveness of instruction, implementation and effectiveness of activities, EL-related PD, family and community engagement, entrance/exit procedures, ELP assessment requirements, coordination with Head Start, stakeholder consultation and review of SpEd/EL services. For LEAs that serve schools identified as Comprehensive or Targeted, a number of additional supports are offered at LEA request. These include efforts such as: support services related to the state's system of continuous improvement, ELD program review, assistance with data review and analysis, and progress monitoring intended to address any challenges identified in the ELD program review. These options are also available for schools identified for Comprehensive or Targeted Support to participate in, if they so choose. For schools identified as Comprehensive Support, as one of the choices offered as a comprehensive support the SEA will 'highly encourage' the school to submit to an ELD program review. For schools identified as Targeted Support due to the performance, growth or achievement of ELs, the school will be 'recommended for participation' in a school level ELD program review.

Monitoring of district Title III grantees will connect directly by confirming if the expected impact/outcome(s) were met or not met over a 3-year period; Components in which its review of grantees' will focus: supplement, not supplant; method of instruction and effectiveness; implementation of activities (as described in the consolidated application) effectiveness and/or process to modify; professional development for educators working with ELs; equitable family and community engagement; entrance and exit procedures; SPED/EL services; Head Start coordination; teacher English fluency; ELP assessment requirements; and stakeholder consultation.

On page 124-125, the SEA addresses progress monitoring of districts.

Strengths	As described, the SEA's monitoring plan for Title III program review appears to include all required elements in addition to supplementary elements related to ELD programs. The technical assistance offerings seem to clearly align with district and school-level improvement planning that would positively impact ELD programming. All Title III monitoring indicators connect directly to District application for funds; the SEA indicates – but does not provide specifics on how – it will offer more robust support for Comprehensive or Targeted support schools. The SEA participates in, and provides support for, EL data review and analysis. The SEA describes a general set of monitoring principles.
Weaknesses	It is unclear whether the assistance provided to Comprehensive or Targeted schools is required, or is differentiated in any way than that provided to all schools that offer ELD programs.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewers) ☐ No (0 peer reviewers)

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