

STATE PLAN
PEER REVIEW CRITERIA
Peer Review Panel Notes Template

STATE: District of Columbia



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)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The Office of the State Superintendent of Education (OSSE) describes the strategies to provide all students in DC with the opportunity to be prepared for and take advanced math coursework in middle school. DC administers PARCC end-of-course math assessments in Algebra I, Geometry, Algebra II, Integrated Math I, Integrated Math II, and Integrated Math III. These assessments are administered to middle school students who take high school level math courses. Middle schools are provided with comprehensive guidelines for identifying which math courses would be appropriate to offer in their schools for their students; and requirements for students to meet to be

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).

	<p>accepted into these courses. OSSE cites the robust choice sector in DC as another strategy to ensure access to accelerated math pathways.</p> <p>In addition, OSSE states that they “continue to work” with LEAs including DCPS “to ensure that all students have the opportunity to be prepared for and to take advanced mathematics coursework in middle school.”</p>
<i>Strengths</i>	The District of Columbia has a history of allowing seventh and eighth grade students who are taking high school level mathematics coursework to take corresponding assessments in seventh and eighth grades. The OSSE will explore an option on the pathways for students taking advanced coursework in seventh grade. The choice sector in the District provides a wide array of academic offerings and comprehensive guidelines for students who are on accelerated mathematics pathways.
<i>Weaknesses</i>	<p>OSSE does not provide data and evidence that their strategies are likely to provide all students in the State the opportunity to take advanced mathematics courses in middle school. In fact, OSSE has qualifications for coursework entry that could prohibit students from having the opportunity to have access to such courses.</p> <p>It is unclear from the application whether all traditional DC public schools and public charter schools offer advanced math courses.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE should clarify whether all middle schools across the district offer advanced math courses, including traditional district and public charter schools. OSSE is not clear whether or not they are responding on behalf of DC public schools, schools within DC LEA or DC traditional schools. OSSE should explain pathway requirements for advanced mathematics coursework. OSSE should provide expanded information over and above the issuance of guidelines that demonstrates their commitment for their middle school students to have access to advanced mathematics coursework.

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

A.3.i: Definition

- Does the SEA provide its definition of “languages other than English that are present to a significant extent in the participating student population”?
- Does the SEA identify the specific languages that meet that definition?
- Does the SEA’s definition include at least the most populous language other than English spoken by the State’s participating student population?

- In determining which languages are present to a significant extent in the participating student population, does the SEA describe how it considered languages other than English that are spoken by distinct populations of English learners, including English learners who are migratory, English learners who were not born in the United States, and English learners who are Native Americans?
- In determining which languages are present to a significant extent in the participating student population, does the SEA describe how it considered languages other than English that are spoken by a significant portion of the participating student population in one or more of the State’s LEAs, as well as languages spoken by a significant portion of the participating student population across grade levels?

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE has provided the definition of “languages other than English that are present to a significant extent in the participating student population”. OSSE expresses it as a “threshold of 5% of the total tested school population” of those students who speak a language other than English as the language that is spoken “to a significant extent”. OSSE identifies this language as Spanish and states that no other language is spoken to a significant extent. In identifying Spanish, OSSE goes on to state that as a member of the PARCC consortium that they considered all languages spoken to a significant extent by states within the consortium and determined that Spanish was the only language that was spoken to a significant extent. The PARCC consortium listed 10 languages across the member states. However, OSSE does not explain if or in what manner they consider languages spoken by students in distinct populations. In addition OSSE does not describe how it considered languages other than English that are spoken by a significant portion of the participating student population in one or more of the State’s LEAs, as well as languages spoken by a significant portion of the participating student population across grade levels.
<i>Strengths</i>	OSSE identified students speaking a language other than English using a 5% threshold and OSSE considered languages that were identified by other PARCC consortium member states to assist in its determination. In its description of languages other than English that are spoken by students in the District, OSSE recognizes languages that are present to a significant extent among the PARCC consortium participants.
<i>Weaknesses</i>	OSSE does not define what the “participating student population” is in DC. With the charter/choice sector as well as schools directly overseen and operated by DCPS, it is not clear what students OSSE considers as “participating students.” OSSE did not state the languages present to a significant extent in the participating student population, for example, including English learners, English learners who are migratory, English learners who are not born in the US, and English learners who are Native American. OSSE states that “The District of Columbia will conduct research to determine if there is another language present to a significant extent as the population shifts over time“ (page 8). In addition, OSSE does not discuss/acknowledge the range of languages spoken in the charter LEAs overseen by the DC Public Charter School Board (DCPCSB).
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or</i>	OSSE should provide analysis of languages spoken by distinct populations of potential distinct languages spoken by all students in the District, including in specific charter school and by grade levels. OSSE should provide definition

<i>clarification that an SEA must provide to fully meet this requirement</i>	of “participating student population.” OSSE should provide a chart or additional data that identifies all other languages spoken by distinct populations of English learners, by student count and by percentage.
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A.3.ii: Existing Assessments in Languages other than English

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>OSSE relies on Spanish language trans-adapted format (computer-based, paper-based, text-to-speech computer-based, and large print paper-based tests), PARCC mathematics assessments in grades 3-8, and high school Spanish. “For all PARCC assessments (ELA/literacy and mathematics), general test administration directions are provided in the following languages: (1) Spanish; (2) Arabic; (3) Navajo; (4) Chinese Mandarin; (5) Vietnamese; (6) Portuguese; (7) Polish; (8) Haitian Creole; (9) Urdu; and (10) Russian. If needed, test administrators may clarify general administration directions in a student’s native language. Test administrators, or other qualified interpreters, providing this accommodation should ideally be literate and fluent in English as well as in the student’s native language” (page 8).</p> <p>OSSE also states that test administrators and other qualified interpreters are fluent in English as well as the student’s native language. In addition, in the 2016-17 school year, DC also will offer a Spanish trans-adaptation of the paper-based DC Science assessment in grades 5, 8, and biology.</p>
<i>Strengths</i>	<p>OSSE’s inclusion of focus group consultation with stakeholders and Next Gen Assessment, CCSSO and OSSE’s English learners working group to identify needs of English learners is a strength of planning to support English learners.</p> <p>OSSE’s efforts at assuring appropriate access to assessments for students whose native language other than English is commendable.</p> <p>In the 2016-2017 school year, OSSE will offer a Spanish trans-adoption of its paper-based Science assessment in grades 5, 8, and in biology.</p>
<i>Weaknesses</i>	From information presented in the plan, it appears that the Science test in Spanish is available only for the paper-based DC Science assessment.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)

<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	
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A.3.iii: Assessments not Available and Needed

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE defines a threshold of 5 percent of the total tested student population to identify languages other than English present to a significant extent in the participating student population. OSSE stated that for assessments other than English that are provided for students across grade levels and by subject tested that there are no other assessments that need to be developed. OSSE stated that they will continue to review their student population periodically to determine if there are shifts in their student population that would constitute a significant number of students who speak any other language other than Spanish and English for whom they would need to develop an assessment in the future.
<i>Strengths</i>	OSSE has a commitment to continue to review population trends to accommodate any shifts in student populations.
<i>Weaknesses</i>	<p>OSSE does not define what the “participating student population” is in DC. With the charter/choice sector as well as schools directly overseen and operated by DCPS, it is not clear what students OSSE considers as “participating students.” OSSE did not state the languages present to a significant extent in the participating student population, for example, including English learners, English learners who are migratory, English learners who are not born in the US, and English learners who are Native American. OSSE states that “The District of Columbia will conduct research to determine if there is another language present to a significant extent as the population shifts over time” (page 8). In addition, OSSE does not discuss/acknowledge the range of languages spoken in the charter LEAs overseen by DCPCSB.</p> <p>Rather than a “periodic” review, OSSE should consider reviewing these populations annually.</p> <p>OSSE does not mention the need for reading/language arts assessments in the native language of all students in the District.</p>
<i>Did the SEA meet all</i>	<input type="checkbox"/> Yes (0 peer reviewers)

<i>requirements?</i>	<input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE should provide evidence and explanation of how they will conduct research to determine if there is another language present to a significant extent as the population shifts overtime. OSSE should provide evidence of languages present to a significant extent in the participating student population, including English learners, English learners who are migratory, English learners who are not born in the US, and English learners who are Native American. OSSE should provide chart or additional data that identifies all other languages spoken by distinct populations of English learners, by student count and by percentage.

A.3.iv: Efforts to Develop Assessments

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE has noted that efforts to identify all languages spoken to a significant extent (5%) in their student population have resulted in the identification of Spanish as the only language (page 9). OSSE has also described efforts to continue to review population trends to assure that student access to assessments remains uninhibited. They have stated that should the population trends shift and a new language is identified that they will move forward to assist these students so that they will have access to all applicable assessments. OSSE described efforts they took to reach out to a wide variety of stakeholder groups and think tank experts in developing the present Spanish trans-adaption for their present inventory of assessments, for example, attending Next Generation Assessment (NGA) LEA focus groups, hosting in person conferences and webinars, and attending Council of Chief State School Officers (CCSSO) conferences. OSSE will continue to reach out to all of these groups in the continued effort to assure that all students have appropriate access to their assessments.
<i>Strengths</i>	OSSE collaborated with stakeholders, including during October 2016 meetings with the Next Gen Assessment

	focus group, CCSO targeted outreach to national EL experts, and engagement with the State’s Title III advisory group. CCSO also presented information about the State Plan during the February 2017 LEA Institute.
<i>Weaknesses</i>	OSSE presented only a vague plan and did not include a timeline. No mention of any assessments other than math, science and biology. There is no summary of the feedback received from stakeholders. It is unclear whether parents and families of English learners were represented on the groups engaged and how public comment was collected and responded to.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE should provide a summary of the feedback received from stakeholders (including educators, parents, families, students and other stakeholders) representing all students in public schools within the District. OSSE should provide documentation as to how parents and families of English learners were represented in public engagement and how public comment was collected and reflected in this plan.

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE lists each major racial and ethnic groups as well as statutorily required subgroups in its accountability system (page 10). However, it is unclear if each child is assigned to each subgroup for which that child has characteristics. For instance, if the student is American Indian and has a disability qualifying under IDEA, then that child should be placed in two subgroups as well as in the “All student” groups.
<i>Strengths</i>	
<i>Weaknesses</i>	OSSE does not provide an assurance that each child is assigned to all subgroups for which they share characteristics as well as the “All student” group. This is critical to assure that accountability is complete and transparent.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an</i>	

<i>SEA must provide to fully meet this requirement</i>	
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A.4.i.b: Additional Subgroups at SEA Discretion

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	N/A – OSSE does not describe any additional subgroups identified in its accountability system
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE has selected the first option, which would continue current flexibility to exclude recently arrived ELs from one administration of the PARCC English/language arts test in their first year, and exclude math and English Language Proficiency test results from accountability determinations the first year. This one year waiver from required participation on the English language arts assessment allows a minimum amount of time for a student to acquire academic English and test-taking skills.
<i>Strengths</i>	
<i>Weaknesses</i>	OSSE does not describe how the exception/waiver will be applied for EL students in years 2 and years 3.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE will use the minimum “n” size of 10 for both accountability and for reporting as they account for the performance of subgroups as they carry out the requirements of any provision of Title I, Part A of ESEA. This “n” size will apply to all students as well as each subgroup of students for accountability purposes.
<i>Strengths</i>	OSSE reports that they conducted “significant statistical modeling ... and concluded that a minimum number of 10 students strikes the right balance of inclusivity and reliability” (page 11)
<i>Weaknesses</i>	

<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>OSSE reports that their proposed selected minimum number of students is statistically sound. OSSE reports that they “conducted significant statistical modeling” that provided information for their determination of “n” size and to determine the impact of the “n” size in supporting reliable analysis; however it did not provide evidence of this modeling within the application.</p> <p>OSSE states that “Raising the n size any further would unnecessarily hide reliable data and lowering the n size any further would compromise the reliability of the data. OSSE will apply this number consistently to all subgroups, for all purposes of the accountability system, and the number is fewer than 30 students. OSSE’s n size for public reporting will also be 10; however, it will take additional measures to prevent disclosing students’ personally identifiable information” (page 11).</p>
<i>Strengths</i>	OSSE attempting to hold as many schools accountable as they can for subgroups is a strength in this application.

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

<i>Weaknesses</i>	OSSE not providing statistical modeling in the application is a weakness of the Plan.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE should provide evidence of “significant statistical modeling “as referred to on page 11 of application.

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

- Does the SEA describe how it determined the minimum number of students?
- Does the description include how the State collaborated with teachers, principals, other school leaders, parents, and other stakeholders when determining such minimum number?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>OSSE states that using the same minimum number for accountability and reporting will ensure consistency and clarity for educators and the public. OSSE does not specifically report the methodology used to determine their “n” size except to say that multiple statistical models were considered.</p> <p>OSSE states that it used community surveys and more than 75 meetings attended by more than 110 organizations. OSSE appears to have possibly committed a “typo” as they state that their Plan was developed “without” the input of stakeholders (full paragraph 2 on page 11). At the same time OSSE provides an expansive and detailed as well as comprehensive narrative of community, parent, teacher, administrator, consortia, and stakeholder input over multiple meetings, seminars, listening sessions and expert input into the formation of their state plan as well as the myriad issues involved in developing that plan which includes input on the determination of their “n” size. OSSE provides 3 attachments that provide detail of their outreach.</p>
<i>Strengths</i>	Community surveys and more than 75 meetings attended by more than 110 organizations, in addition to meetings with parents, families, and community members contributed to the strategies and decisions that are reflected in the Plan submitted.
<i>Weaknesses</i>	<p>OSSE did not provide a methodology it used to determine “n” size. Additional detail revealing OSSE’s methodology would have been helpful.</p> <p>OSSE states that it used community surveys and more than 75 meetings attended by more than 110 organizations. OSSE appears to have possibly committed a “typo” as they state that their Plan was developed “without” the input</p>

	of stakeholders.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE states that it is committed to keeping students' personally identifiable information confidential and private. For accountability and reporting purposes, OSSE will suppress subgroup reporting for groups of students less than 10 students, in addition to outcome categories for student academic achievement (for example, if no student scored in a certain PARCC performance level, OSSE may suppress reporting). In addition, OSSE is proposing to conduct secondary data suppression and applying top and bottom coding to extreme percentages.
<i>Strengths</i>	OSSE has engaged in high quality and comprehensive engagement with multiple groups as they developed their state plan which included feedback on the application and possible implication of their selected "n" size as well as the methodology on determining student privacy. For accountability and public reporting purposes, OSSE will suppress subgroups that are composed of fewer than 10 students, but it is also exploring additional steps to ensure the confidentiality of student information.
<i>Weaknesses</i>	OSSE does not cite the guiding policy or statute that provides the framework that is followed for protecting student privacy.

³ See footnote 5 above for further guidance.

	OSSE has general principles for protecting privacy but appears to still be working out operational details. An illustration of how these principles are to be applied would have been helpful.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	N/A – OSSE's minimum number of students for purposes of reporting is the same as the minimum number of students for purposes of accountability.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE states the current deep and persistent gaps between specific groups of students and claims that their state-level goals chart out an ambitious, yet feasible path toward ensuring meeting the needs of every child. OSSE’s long-term goal is for 85 percent of students – all students in each subgroup – to demonstrate college and career readiness on statewide standardized achievement assessments (scoring level 4 or higher on PARCC, and level 3 or higher on MSAA). OSSE has set this goal over 20 years, starting with 2014-2015 testing data, with yearly interim milestones, outlined in Appendix A, with gap closing goals noted at year 10. OSSE has set goals for each sub-group of students, includes a baseline data for all students and for each subgroup of students, includes a timeline for the long-term goal of 85% demonstration of college and career readiness.
<i>Strengths</i>	OSSE pursued wide-ranging stakeholder input in developing its long-term goals.
<i>Weaknesses</i>	OSSE aims to reach their established long-term goals over approximately <u>the next 20 years</u> . Each subgroup will have the same 85% long term goal over the 20 years regardless of their starting point. Twenty years is a long timeframe to move 85% of all students to college and career readiness in DC. One reviewer supports the statement that the LTGs are significantly ambitious for certain subgroups, particularly those starting this accountability cycle with low academic achievement, due to the methodology that OSSE chose to apply. Three reviewers hold the opinion that the LTGs are not ambitious for all subgroups. Over the 20 year period, there is too much risk that a sense of urgency would be lost and the cohesiveness of a high quality comprehensive plan would unravel.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or</i>	OSSE should provide rationale for selection of 2014-2015 as the baseline year and selection of a 20 year timeline for establishing long term goals. OSSE should provide clarification on methodology for closing gaps on specific

<i>clarification that an SEA must provide to fully meet this requirement</i>	groups of students. OSSE should provide information on the long-term goals for all students for improved academic achievement by grade-level, and by assessment measure. Please clarify how OSSE proposes to use PARCC 4+ measure and/or PARCC 3+ measure in identifying and describing its long term goals for students. It is unclear if these OSSE determined LTGs apply to public charter schools overseen by DCPCSB for accountability and reporting purposes. Please provide an explanation of how OSSE will use these goals in overseeing, monitoring and making resource allocation decisions for Title I identified public charter schools in the District.
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A.4.iii.a.2: Measurements of interim progress

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE provides measurements of interim progress towards meeting the long-term goals for all students and for each subgroup of students. In Appendix A, OSSE provides measurements of interim progress for all students and subgroups on the PARCC but does not provide measurements of interim progress on the MSAA.
<i>Strengths</i>	
<i>Weaknesses</i>	20 years is a long timeframe to move 85% of all students to college and career readiness in DC. OSSE states that it is using both PARCC and MSAA, however the measurements of interim progress towards meeting the long-term goals presented in Appendix A does not include MSAA data. In addition, OSSE did not provide rationale for why it used 2014-2015 as the baseline year to establish its long-term goals.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement?</i>	If OSSE decides to revise its long-term goals in other sections of the Plan, then they should ensure that interim progress goals are updated to align with and link to updated long-term goals. Include a complete explanation on the state's philosophy and methodology of gap closure. OSSE should provide rationale for selection of 2014-2015 testing results as baseline for long-term goals. OSSE should provide information on the long-term goals for all students for improved academic achievement by grade-level, and by assessment measure (is OSSE proposing the use of PARCC 4+ measure or 3+ measurement and/or MSAA3+ measure?).

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>OSSE’s 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. OSSE sets larger growth goals for those subgroups that are further behind.</p> <p>The DC OSSE recognizes the current deep and persistent achievement gaps among specific subgroups of students. Recognizing such gaps, the DC will work persistently and urgently toward closing gaps in half over 10 years by setting a growth trajectory, especially for the students who are furthest behind.</p>
<i>Strengths</i>	The measures of interim progress specifically consider faster rates of growth for groups of students that currently have lower outcomes to make significant progress in closing statewide gaps in the proficiency outcomes.
<i>Weaknesses</i>	<p>20 years is a long timeframe to move 85% of all students to college and career readiness in DC. Growth goals for higher achieving sub-groups (for example, white students) are smaller and may have the unintended consequence of messaging to students, families and other stakeholders that OSSE has set lower expectations for certain subgroups of students.</p> <p>The data and method used to determine the reduction of statewide proficiency gaps is unclear.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE identifies a long-term goal of 90% for year adjusted cohort graduation rate for all students and all subgroups. OSSE identifies and describes this goal for all students and for all subgroups, includes baseline data from the 2014-2015 school year, and sets a timeline of 20 years. This timeline is the same for all students and for all sub-groups of students. The goals are ambitious.
<i>Strengths</i>	DC only pursues reporting accountability for a 4-year cohort graduation rate and achieved an excellent rate of improvement over the previous 3 years.
<i>Weaknesses</i>	Although technically the 20 year timeframe meets the requirement of statute, peer reviewers note that a 20 year time frame for a LTG is not rigorous or challenging.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	One reviewer does not agree that the LTG is ambitious and complies with the requirements of the law. Provide rationale that OSSE believes that the goal is ambitious for all students and all subgroups of students. Provide rationale for selection of 2014-2015 testing results as baseline for long-term goals.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	N/A – OSSE has not chosen to establish extended year graduation rates.
<i>Strengths</i>	
<i>Weaknesses</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE provides measurements of interim progress towards the long term goal of 90% graduation rate for the four-year adjusted cohort graduation rate for all students and for each subgroup of students in Appendix A. These are by year from 2014-2015 to 2038-2039. They do not include a 5 or 6 year extended-year adjusted cohort rate in their plan, however they propose to use an alternative graduation metric that captures all students who graduate in a given year, regardless of timeframe.
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Although technically the 20 year timeframe meets the requirement of statute, peer reviewers note that a 20 year time frame for a LTG is not rigorous or challenging.</p> <p>OSSE should provide clarification on the relationship between these LTGs and charter performance goals. Explain how these goals will be used for identification purposes and differentiation for public charter schools in the District. Provide assurances that LTG do not supersede public charter school accountability requirements.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this</i>	

requirement

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	DC’s graduation rate is approximately 20 percentage points lower than the national average despite recent graduation rate growth by 8 percentage points. Considering the current graduation rate of 69.2 percent, DC has established an ambitious goal of a 90 percent four-year graduation rate. To close current existing gaps in graduation rates among subgroups, the established interim progress goals require specific subgroups to increase at a higher rate than the rate of growth required of all students.
<i>Strengths</i>	The long-term and interim progress goals are aligned with DC’s value of equity and continuous efforts to close any existing gaps.
<i>Weaknesses</i>	Although technically the 20 year timeframe meets the requirement of statute, peer reviewers note that a 20 year time frame for a LTG is not rigorous or challenging. OSSE should provide clarification on the relationship between these LTGs and charter performance goals. Explain how these goals will be used for identification purposes and differentiation for public charter schools in the District. Provide assurances that LTG do not supersede public charter school accountability requirements.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE is a member of the WIDA Consortium and administers the ACCESS for ELLs 2.0 as an annual measure of English language proficiency for students identified as English learners. OSSE’s EL exit criteria is a composite score of 5.0 (Bridging level per WIDA) and targets will be based on the student’s starting overall composite proficiency level demonstrated after participation in their first test. Depending on starting level achieved on the initial baseline exam, students will have a certain number of years to reach level 5, with a maximum of five years. OSSE is using 2014-2015 data for baseline, but states on page 17 that it will re-calculate baseline in 2016-2017. The long term goal is expecting 85% of EL students to achieve English language proficiency statewide based on their individual growth pace.
<i>Strengths</i>	OSSE has attempted to meet the individual needs of EL students as they enter school with different levels of EL proficiency. OSSE’s goal is to develop a model that reflects the true trajectory of language development in their students. The OSSE adopted a modified version of the WIDA growth-to-target model that will consider starting language proficiency level and student factors such as his/her grade level.
<i>Weaknesses</i>	Although technically the 20 year timeframe meets the requirement of statute, peer reviewers note that a 20 year time frame for a LTG is not rigorous or challenging. OSSE should provide clarification on the relationship between these LTGs and charter performance goals. Explain how these goals will be used for identification purposes and differentiation for public charter schools in the District. Provide assurances that LTG do not supersede public charter school accountability requirements.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
<i>If no, describe the specific information or clarification that an SEA must provide to</i>	One reviewer does not agree that the LTG is ambitious and complies with the requirements of the law. Provide more rationale that the goal is ambitious. OSSE should provide rationale for selection of 2014-2015 testing results as baseline for long-term goals.

<i>fully meet this requirement</i>	
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A.4.iii.c.2: Measurements of interim progress

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	In Appendix A OSSE provides measurements of interim progress towards the long term goal for increases in the percentage of English learners making progress in achieving English language proficiency. OSSE sets yearly progress in achieving English language proficiency targets for each year over the 20 year timeframe. In their application, OSSE states that under their proposed model for EL students that “Measurements of interim progress will be based on future analysis” (page 17). However, Appendix A contains two charts that are titled “English Language Growth” that provides baseline data, modest increments of yearly percentages of increase and what appears to be interim measures for improvement.
<i>Strengths</i>	Each year after the baseline exam, students are expected to make acceptable growth towards the goal of ACCESS level 5. Students’ growth target is determined for the next year by calculating how many points a student needs to grow to reach level 5 then dividing by the number of exams remaining. When students’ actual growth is greater than or equal to their growth target, they have made acceptable growth. Growth targets are recalculated each year.
<i>Weaknesses</i>	Although technically the 20 year timeframe meets the requirement of statute, peer reviewers note that a 20 year time frame for a LTG is not rigorous or challenging.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

A.4.iv.a: Academic Achievement

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE proposes to use a measure of “(percent of students scoring at the level of college and career readiness – i.e., level 4 and higher on the Partnership for Assessment Readiness for College and Careers (PARCC) and level 3 and higher on Multi-State Alternate Assessment (MSAA)” (page 18). OSSE states that these assessments are administered annually for all students and for all subgroups of students, however, it does not assure that it is used for all schools in the District. The indicator can be disaggregated for each subgroup, and measures grade level status (proficiency) on the annual ELA and math assessment (PARCC). OSSE also includes proposed high school indicators utilizing SAT/ACT and AP/IB student performance.
<i>Strengths</i>	In addition to the indicator for PARCC 4+, OSSE will include the additional indicators of ACT/SAT “College Ready” Benchmark, ACT/SAT DC Percentile Threshold, AP/IB Participation, and AP/IB Performance for high school, however the AP and IB exam measure may be better categorized as a measure of school quality and student success.
<i>Weaknesses</i>	OSSE states that these assessments are administered annually for all students and for all subgroups of students, however, it does not assure that it is used for all schools in the District. In the table on page 18, OSSE presents an additional measure, PARCC 3+. It is unclear if this is a typo and they meant this to align with the narrative of MSAA 3+ (this appears in other areas of the document). Alternatively, it may mean that OSSE will be holding schools accountable both for the percentage of students who score at or above PARC 3+ and also the percentage who are scoring at or above PARCC 4+. The information provided is very sparse. It appears that DC may be using a Performance Index but it is not clear in what way. There is no information provided on the validity and reliability of these indicators, nor on whether information is averaged. The AP and IB exam measure may be better categorized as a measure of school quality

	and student success.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	It is unclear on page 18 for the academic achievement indicator if OSSE proposes to use PARCC3+ or PARCC4+ or MSAA3+ and PARCC4+. The data tables and narratives on pg. 18, 72, 73, 74 & 75 do not match. More information should be provided regarding how this indicator is computed, the reliability and validity of the assessments, how the 3+ and 4+ components are used, how data is averaged, and how the indicator is linked to the long-term goals. OSSE should provide an explicit crosswalk between indicators that start on page 18 and the proposed framework starting on page 27 in the current application. The reviewers could not determine the relationship between the proposed indicators and how they would be translated to the metric weights proposed.

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE proposes to use both a criterion referenced and norm referenced growth measure for non-high school students. “The PARCC is administered once a year and to all students and to each subgroup of students. Based on this data, OSSE will include two measures of academic progress, or school-level growth – one norm-referenced/relative growth measure e.g., median growth percentile (MGP) and one criterion referenced growth measure e.g. growth to proficiency – in the accountability framework for students in grades 4-8. Students in grade 3 are in their first year of PARCC assessments and do not have a prior year score for comparison. Both measures will be calculated annually for all students and separately for each subgroup of students.” (page 19) OSSE states that

	these assessments are administered annually for all students and for all subgroups of students, however, it does not assure that it is used for all schools in the District. The indicator can be disaggregated for each subgroup, and measures grade level status (proficiency) on the annual ELA and math assessment (PARCC).
<i>Strengths</i>	OSSE will explore all possible options in developing a high school growth measure in the future. (High school students are only tested one time during grades 9-12 therefore, OSSE does not include a growth indicator at the high school level at this time).
<i>Weaknesses</i>	OSSE states that these assessments are administered annually for all students and for all subgroups of students, however, it does not assure that it is used for all schools in the District. OSSE may benefit from clarifying the expectation between student-level and school-level accountability in these sections. The narrative is unclear and confusing. There is no information provided on the validity and reliability of these indicators.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE should provide a more in-depth description of their growth model and how it works. For example, on what variables do they condition their system; is it based solely on students test history; do they only condition on the same subject; do they use one year of data or multiple years of data? If applicable, include copy of growth model technical reports.

A.4.iv.c: Graduation Rate

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

alternate academic achievement standards under ESEA section 1111(b)(2)(D) and awarded a State-defined alternate diploma under ESEA section 8101(23) and (25)?

- Can the indicator be disaggregated for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE proposes to use a four year adjusted cohort graduation rate, with the methodology set by the US Department of Education. It states that this calculation includes all students and all subgroups, but with many other indicator descriptions/narrative, OSSE does not distinguish/delineate between student-level and school-level accountability. OSSE does not state that the same calculations will be used for all schools in the District. The indicator is valid and reliable, based on OSSE’s long term goals, and can be disaggregated for all subgroups of students. OSSE proposes an additional, alternate graduation metric that includes “all students who graduate in a given year regardless of timeframe.” As with other indicators, it is unclear how this indicator will be applied to schools.
<i>Strengths</i>	OSSE’s Graduation Rate Indicator of 4-year Adjusted Cohort applies to all students and each subgroup of students; and OSSE seeks to give credit to schools for students who take more than four years to graduate.
<i>Weaknesses</i>	OSSE states that this calculation includes all students and all subgroups, but with many other indicator descriptions/narrative, OSSE does not distinguish/delineate between student-level and school-level accountability. OSSE does not state that the same calculations will be used for all schools in the District. There is no explanation provided regarding how these graduation rates are weighted and combined, whether they are lagged, and whether they are averaged over time. It is not clear how the indicator is used in relation to long-term goals.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE should provide additional justification as to why they propose to use an extended graduation rate calculation for students in the District. The application states that OSSE will use this calculation, but does not include any justification or rationale as to why this is a good approach for DC and its students for data collection, reporting and accountability purposes. OSSE should provide evidence that these graduation metrics are linked to LTGs or alternatively re-classify as a measure of school quality and student success as required by the indicator. For both graduation rate measures, it is unclear where summer graduates are included in the 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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE utilizes ACCES for ELLs 2.0 as the assessment for English language learners in DC. OSSE has determined that it takes, on average, 5 years for English language learners to reach proficiency in English. It has established individual target growth, by year, for EL students on ACCESS, and has identified and described long-term goal increases for the percentage of EL students making progress over a 20 year period. OSSE is using 2014-2015 data for baseline, but states on page 17 that it will re-calculate baseline in 2016-2017.
<i>Strengths</i>	Each year after the baseline exam, students are expected to make acceptable growth towards the goal of ACCESS level 5. Students’ growth target is determined for the next year by calculating how many points a student needs to grow to reach level 5 then dividing by the number of exams remaining. When students’ actual growth is greater than or equal to their growth target, they have made acceptable growth. Growth targets are recalculated each year.
<i>Weaknesses</i>	OSSE did not provide evidence that their proposed measure is valid and reliable. OSSE states that it is using a modified growth to target model and offers no detailed explanation of what this means. Other details that would clarify OSSE’s rationale behind the selected methodology are either missing or are unclear. It is not clear whether students are no longer included in this measure after 5 years if the student has <i>not</i> exited ELL status.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE should provide clarification on how students who fail to reach proficiency within 5 years will be captured within this calculation. OSSE should provide evidence that their proposed methodology is valid and reliable.

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

Note: Peer reviewers must separately review each School Quality or Student Success indicator that an SEA submits. For example, if an SEA submits one School Quality or Student Success indicator for high schools and a different School Quality or Student Success indicator for elementary and middle schools, then peer reviewers will provide feedback, using the criteria below, separately for each indicator. For any School

Quality or Student Success indicator that does not apply to all grade spans, the SEA’s description must include the grade spans to which it does apply. (ESEA section 1111(c)(4)(B)(v))

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	<p>OSSE proposes to use the following to address the “school quality or student success indicators”:</p> <ul style="list-style-type: none"> • Addressing chronic absenteeism <ul style="list-style-type: none"> ○ schools will receive points on the category they perform best on – 90%+ attendance OR growth in 90%+ attendance • in seat attendance • re-enrollment • CLASS pre-K classroom observation results • Access and opportunity measure (piloted in 18-19) <p>The proposed measures can be disaggregated for all subgroups. They are in alignment with OSSE’s proposed long term goals. OSSE identifies when each measure applies to different grade spans of students. OSSE describes in detail each measure and their rationale to include them.</p>
<i>Strengths</i>	<p>OSSE is offering some creative measures that they would like to tailor to the unique need of each school. The use of reenrollment as a school quality indicator has promise in that if applied in a uniform fashion it could help differentiate between schools in the state’s choice rich environment. OSSE’s focus on Pre-K is commendable, using CLASS.</p> <p>The OSSE has explored various measures across the academic achievement, academic progress, graduation rate, and school environment domains such as growth measures at the high school level, including of the DC Science assessment, additional measures of academic achievement prior to third grade, a measure of ninth graders’ on-track status for high school graduation, dual enrollment, career and technical education measures, and additional school engagement measures. Even though they are not included in their accountability system due to challenges with data availability and comparability across schools, OSSE is committed to further review of these measures for possible inclusion over time.</p>

<i>Weaknesses</i>	<p>A rationale has been provided for the use of each measure, however OSSE provides few details on how the components are calculated and how the components will be used to differentiate schools.</p> <p>OSSE has offered components of the “chronic absenteeism” model that are applied arbitrarily from school to school and therefore do not permit differentiation of schools. OSSE does not provide complete information regarding all aspects of the Reenrollment component.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>OSSE should provide clarification on measurement for chronic absenteeism pertaining to percentile growth for student outcome. Expand explanation of the use of two metrics to determine chronic absenteeism as well as provide example of how chronic absenteeism measure will be utilized. OSSE should provide methodologies for computing their proposed indicators. OSSE should provide evidence that these proposed indicators result in meaningful differentiation between schools, particularly regarding in-seat attendance. A more thorough description to accompany proposed measures for example how OSSE will compute and apply growth in 90%+ attendance should be provided. OSSE should provide an explicit crosswalk between indicators that start on page 18 and the proposed framework starting on page 27 in the current application. The reviewers could not determine the relationship between the proposed indicators and how they would be translated to the metric weights proposed. It is unclear how the ‘re-enrollment’ measure could contribute to the school environment indicator – more detailed rationale should be added.</p>

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

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

- Does the SEA describe its system of meaningfully differentiating, on an annual basis, all public schools in the State?
- Is the State’s system of annual meaningful differentiation based on all indicators in the State’s accountability system?
- Does the State’s system of annual meaningful differentiation include the performance of all students and each subgroup of students on each of the indicators in the State’s accountability system?

<i>Peer Response</i>	
<i>Peer Analysis</i>	<p>OSSE’s statewide accountability system is called School Transparency and Reporting (STAR) system. OSSE proposes to provide an annual summative rating for all public schools in DC, and will include all students and each subgroup of students. “Schools will be assigned to one or more framework types based on grade configuration; the four framework types are Elementary School, K-8 School, Middle School, and High School. ... A school’s final score is a weighted average of its framework scores: All Students (75 percent), Race/Ethnicity (5 percent divided evenly between all racial/ethnic subgroups), Economically Disadvantaged (5 percent), English Language Learners</p>

	<p>(5 percent), and Special Education (10 percent). The final score is based on the weighted average of framework scores in order to emphasize a specific focus those groups of students who have historically had gaps in outcomes relative to their peers” (page 26). Schools will be categorized into five summative levels (One Star – Five Star, One Star being lowest and Five Star being highest).</p> <p>In addition, OSSE notes on page 31, ” Note that nothing in this statewide accountability system is designed or intended to forestall, impede, mitigate, interfere with, or delay action by the DC Public Charter School Board or any other eligible chartering authority with respect to amendments, revocation, non-renewal of any school's charter as provided for in the DC School Reform Act.” This statement, however, fails to acknowledge the core authority of DCPCSB as a charter authorizer and holder of the charter contract with public charter boards in DC. It is unclear if low-, under- and chronically underperforming public charter schools in DC will be required to undergo a school improvement planning process with OSSE if identified as CSI, or if they will be governed by the DC School Choice Act and the terms of their charter contract and performance contract with DCPCSB.</p>
<i>Strengths</i>	OSSE is developing a system of differentiation that is unique to the grade bands of schools within the state. In addition, a school’s final score is a weighted average of its framework scores: All Students (75%), Race/Ethnicity (5% divided evenly between all racial/ethnicity subgroups), Economically Disadvantaged (5%), English Language Learners (5%), and Special Education (10%).
<i>Weaknesses</i>	OSSE presents a system of meaningful differentiation that may have too many components for the indicators which could yield a confused picture of how the school is functioning. In addition, it would have been helpful if state provided additional information for rationale on distribution of scores for subgroups.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.v.b: Weighting of Indicators

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE provides the metrics included in each grade band framework (Elementary, K-8, Middle and High schools) and their weighting of each indicator. Academic Achievement, Other Academics, Graduation Rate, and Progress in Achieving English Language Proficiency indicators each receive substantial weight individually and in aggregate receive much greater weight than the School Quality or Student Success Indicators. In addition, OSSE describes how it will perform calculations if data is absent due to non-testing, or if a school does not have the minimum number of students to trigger accountability determinations, or privacy/suppression concerns.
<i>Strengths</i>	OSSE provided a clear explanation on weighting of each indicator.
<i>Weaknesses</i>	Progress in Achieving English Language Proficiency is weighted low (5%) overall, despite identification by OSSE that EL students in the District must accelerate acquisition of English language proficiency. OSSE should provide an explicit crosswalk between indicators that start on page 18 and the proposed framework starting on page 27 in the current application. The reviewers could not determine the relationship between the proposed indicators and how they would be translated to the metric weights proposed.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE recognizes that many school campuses cross grade configurations (that is, K-8; K-12; 6-12) and states that it

	<p>should address a smooth pathway to combining framework scores for grade bands to arrive at school ratings. However, OSSE has not indicated whether or not they have sites with a P-2 grade configuration. OSSE is strongly urged to complete their work in further defining this system and to submit a plan for such that would include methodology and protocol for the design of the system. OSSE states that it is currently modeling solutions, in partnership with stakeholders.</p> <p>In addition, OSSE notes on page 31, ” Note that nothing in this statewide accountability system is designed or intended to forestall, impede, mitigate, interfere with, or delay action by the DC Public Charter School Board or any other eligible chartering authority with respect to amendments, revocation, non-renewal of any school's charter as provided for in the DC School Reform Act.” This statement, however, fails to acknowledge the core authority of DCPCSB as a charter authorizer and holder of the charter contract with public charter boards in DC. It is unclear if low-, under- and chronically underperforming public charter schools in DC will be required to undergo a school improvement planning process with OSSE if identified as CSI, or if they will be governed by the DC School Choice Act and the terms of their charter contract and performance contract with DCPCSB.</p>
<i>Strengths</i>	OSSE is working toward applying its system to schools with variant grade distributions.
<i>Weaknesses</i>	OSSE has not completed their modeling that would allow for a complete review.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE should submit methodology or methodologies for annual meaningful differentiation for schools for which an accountability determination cannot be made including those schools below a certain threshold of minimum points possible and for which no framework score will be calculated. OSSE should provide examples of application of the model in a few real examples of non-traditional grade configuration schools or campuses in the District.

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

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

- Does the SEA describe its methodology to identify not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement including, if applicable, how it averages data (*e.g.*, does the State use a uniform averaging procedure across all schools)?
- Does the SEA’s methodology result in the identification of not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement?

- Does the SEA include the year in which it will first identify these schools for comprehensive support and improvement (*i.e.*, does the timeline comply with the Department’s guidance)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>OSSE proposes to identify the bottom 5% of schools in the District that earn the lowest total number of points on the STAR framework as compared to their peers, starting in the 2018-2019 school year and every three years after that</p> <ul style="list-style-type: none"> • Year 0 and Year 1 – identify schools and announce application for school improvement grants (either formula or competition) • Years 1-3 – administer grants, OSSE to provide targeted assistance to schools, OSSE to monitor grant implementation and school improvement • Year 4 or 5 – schools exit CSI status or engage in deeper intervention. <p>It was unclear to reviewers if OSSE is planning to apply this methodology to identify all of the lowest performing schools in the District, under Title I, Part A assistance or not. It may be possible that by the methodology described by OSSE in the Plan narrative that the lowest 5% may include a school that is not receiving these funds.</p> <p>In addition, OSSE notes on page 31, ” Note that nothing in this statewide accountability system is designed or intended to forestall, impede, mitigate, interfere with, or delay action by the DC Public Charter School Board or any other eligible chartering authority with respect to amendments, revocation, non-renewal of any school's charter as provided for in the DC School Reform Act.” This statement, however, fails to acknowledge the core authority of DCPCSB as a charter authorizer and holder of the charter contract with public charter boards in DC. It is unclear if low-, under- and chronically underperforming public charter schools in DC will be required to undergo a school improvement planning process with OSSE if identified as CSI, or if they will be governed by the DC School Choice Act and the terms of their charter contract and performance contract with DCPCSB.</p>
<i>Strengths</i>	<p>The STAR system of accountability will assist with providing clarity of identification in a choice and multi-sector system.</p> <p>The OSSE claims that its approach is particularly focused on concentrated attention and resources for schools designated for Comprehensive Support and Improvement. A key part of the strategy is to concentrate the collective focus on a small group of the schools with the lowest current outcomes to leverage time, attention, and resources devoted to improvement. A clear timeline has been provided within the plan (Year 0 and 1, Year 1-3, and Year 4-5). Schools will be first identified in 2018-19 school year and every three years thereafter.</p>
<i>Weaknesses</i>	<p>The methodology described by OSSE does not differentiate between those schools receiving Title I, Part A funds and those that do not. This creates confusion on how funds will be distributed to support these schools if one of the designated schools does not qualify for Title I support. It is not clear, for example, whether the SEA plans to</p>

	<p>identify five percent of schools by grade span or to use a single list to identify schools. The methodology lacks clarity in that there is little specificity on how these schools are identified using a formula or in providing examples.</p> <p>OSSE did not provide specific examples to demonstrate how the calculation would work under its proposed methodology. It was unclear to reviewers which schools would ultimately be identified following OSSE’s proposed approach.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>OSSE did not meet the standard as presented on page 30 within the application as determined by peer reviewers. OSSE states “lowest performing 5% of schools that score in the bottom 5% of total number of points on the accountability framework as compared to their peers”. It is unclear to peer reviewers:</p> <ul style="list-style-type: none"> • that OSSE is identifying not less than the lowest performing 5% of Title I schools, as required by statute; • how OSSE defines peer schools under this definition, and are “peer schools” in any way connected to earlier grade band framework references in the Plan; and • if the definition as presented identifies 5% of 5% of schools, or the lowest performing 5% of schools receiving Title I, Part A funds as required by statute. <p>OSSE should clarify that they will identify not less than the lowest performing 5% of schools receiving Title I, Part A support or if it is their intention to identify the lowest performing 5% of schools out of the system of all schools in the state. OSSE should provide clarity in the exact methodology they will use to identify these schools by providing examples of the process.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE proposes to identify all high schools that graduate less than 67% of their students, as measured by the four year adjusted graduation rate, as Comprehensive Support type 2 schools (CS2 schools). OSSE will start to identify

	CS2 schools in the 2018-2019 school year and every three years thereafter. In a note in the table on page 31, OSSE notes that this definition will not apply to schools for which the alternative framework is determined to be applicable. OSSE does not include the alternative framework in its Plan application, nor does it define which schools are eligible to use the alternative framework.
<i>Strengths</i>	
<i>Weaknesses</i>	<p>In a note in the table on page 31, OSSE states that this definition will not apply to schools for which the alternative framework is determined to be applicable. OSSE does not include the alternative framework in its Plan application, nor does it define which schools are eligible to use the alternative framework.</p> <p>OSSE notes on page 31, ” Note that nothing in this statewide accountability system is designed or intended to forestall, impede, mitigate, interfere with, or delay action by the DC Public Charter School Board or any other eligible chartering authority with respect to amendments, revocation, non-renewal of any school's charter as provided for in the DC School Reform Act.” This statement, however, fails to acknowledge the core authority of DCPCSB as a charter authorizer and holder of the charter contract with public charter boards in DC. It is unclear if low-, under- and chronically underperforming public charter schools in DC will be required to undergo a school improvement planning process with OSSE if identified as CSI, or if they will be governed by the DC School Choice Act and the terms of their charter contract and performance contract with DCPCSB.</p> <p>There is no detail or clarity on how these high schools that fail to graduate one-third or more of their students will be identified for comprehensive support.</p> <p>It is not clear how the SEA computes this graduation rate: whether this is based on a single year or an average across years</p> <p>Specific examples were not provided to demonstrate how the calculation would work. Only brief definition and timeline for identification have been provided.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE should provide additional information on the “alternative framework” and how it proposes to implement this framework with schools in the District. If OSSE chooses to move forward with their proposed alternative framework and methodology under this indicator, three peer reviewers recommend that OSSE should work with USED and the Secretary to seek appropriate flexibility to implement their chosen strategy.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE proposes to identify all schools that do not sufficiently improve to exit status in three years as Comprehensive Support type 3 schools (CS3 schools). OSSE will start to identify CS3 schools in 2022-2023 and every three years thereafter. In addition, OSSE proposes to identify the bottom performing 5% of all schools, as well as the bottom performing 6%-10% of all schools in the District and provide this identification status to school leaders in DCPS.
<i>Strengths</i>	
<i>Weaknesses</i>	OSSE did not describe its methodology to identify how schools receiving Title I, Part A funds will receive additional targeted support under ESEA section 1111(d)(2)(C) or provide specific examples to demonstrate how the accountability system would be implemented to identify underperforming schools. OSSE only provided a brief definition of school type, essentially a re-statement of school type definitions in ESSA statute, and timeline for school identification.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE did not 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>i.e.</i> , 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) and that have not satisfied the statewide exit criteria for such schools within a State-determined number of years. OSSE should resubmit their plan to describe their methodology to identify schools receiving Title I, Part A funds that have received additional targeted support (<i>i.e.</i> , 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) and that have not satisfied the statewide exit criteria for such schools within a State-determined number of years.

A.4.vi.d: Frequency of Identification

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE will identify each of the three pathways to Comprehensive Support and Improvement (CS1, CS2, & CS3) and includes the frequency with which it will identify each type of school (CSI, CS2 and CS3) beginning in 2018-2019 and every three years after that in its Plan. TSI-2 schools are identified annually.
<i>Strengths</i>	OSSE plans to annually calculate the schools that would have fallen into the bottom 5 percent if the designation were to be applied that year. OSSE will also calculate the schools annually that would be close to the threshold for identification (the bottom 6-10%) and would provide the information to LEAs to ensure awareness and drive urgency for improvement.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE proposes to identify Targeted Support and Improvement Schools – Consistently Underperforming subgroups as “Any school with “low performing” subgroups, which in DC is defined as any school with a subgroup

	framework score that is below the threshold used to identify schools in the bottom 5 percent for Comprehensive Support” (page 32). It proposes to identify schools beginning in 2018-2019 and every three years after that. This is based on OSSE’s statewide system of annual meaningful differentiation.
<i>Strengths</i>	
<i>Weaknesses</i>	OSSE did not provide specific examples to demonstrate how the calculation would result in school identification; they only provided a brief definition of school categories and timeline for identification of schools.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE did not describe its methodology to identify schools with one or more “consistently underperforming” subgroups of students, including its definition of “consistently underperforming”. OSSE should demonstrate that the methodology would result in the identification of any school with one or more “consistently underperforming” subgroups of students. OSSE should show that the methodology is based on all indicators in the statewide system of annual meaningful differentiation. OSSE should give reasoning behind their decision to identify these schools every three years instead of annually.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE proposes to identify Targeted Support and Improvement Schools – Additional Targeted Support - as “any school with one or more “consistently low performing” subgroups, which in DC is defined as any school that for two years has one or more subgroup framework scores that repeatedly falls below the threshold used to identify schools in the bottom 5 percent for Comprehensive Support” (page 33). It proposes to identify schools beginning in 2018-2019 and every three years after that. This is based on OSSE’s statewide system of annual meaningful differentiation.
<i>Strengths</i>	
<i>Weaknesses</i>	OSSE provides an unclear and incomplete answer. It was unclear to peer reviewers what “repeatedly falls below

	the threshold” in the context of two consecutive years as mentioned on page 33 within the application means. OSSE did not provide specific examples to demonstrate how the calculation would result in school identification; they only provided brief definition of school categories and timeline for identification of schools.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE provides an unclear and incomplete answer to this indicator. Specific examples were not provided to demonstrate how the methodology and calculations would be applied to identify schools. It was unclear to peer reviewers what “repeatedly falls below the threshold” in the context of two consecutive years as mentioned on page 33 within the application means. OSSE should resubmit plan with information to meet the requirements of this indicator.

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

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE states its commitment to all schools meeting the 95% participation rate threshold. OSSE does not state that all student subgroups in schools must meet this participation rate expectation, nor how it factors into its STAR system. Accountability consequences for persistent failure to meet this participation expectation are vague and include “additional actions and interventions as appropriate,” including technical assistance, and monitoring (page 33). Additional appropriate actions will be taken for schools that miss participation rate or do not improve.
<i>Strengths</i>	
<i>Weaknesses</i>	OSSE does not state that all student subgroups in schools must meet this participation rate expectation, nor how it factors into its STAR system. Accountability consequences for persistent failure to meet this participation expectation are vague and include “additional actions and interventions as appropriate” (page 33). OSSE did not state that they would report participation rates by student subgroup, nor how it will hold schools accountable for missing participation rate thresholds for identified student subgroups in addition to for all students. It is unclear how the OSSE will hold LEAs accountable if they miss this target. OSSE states that schools will not automatically be identified for missing the 95% participation rate, but for schools that do not meet the participation rate for multiple years or who do not show sustained improvement, the OSSE will implement additional actions and interventions as appropriate. No other detailed information was provided.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE did not state that all student subgroups in schools must meet this participation rate expectation, nor how it factors this calculation into its STAR system. OSSE should provide clarification for the statement made on page 33 within the application that states that schools will not automatically being identified for missing the 95% participation rate.

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

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

- Does the SEA describe its statewide exit criteria for schools identified for comprehensive support and improvement, which may include how the exit criteria are aligned with the State’s long-term goals and measurements of interim progress?

- Does the SEA’s description include the number of years within which schools are expected to meet such criteria?
- Is the number of years no more than four years?
- Do the exit criteria ensure continued progress to improve student academic achievement and school success in the State (e.g., do the exit criteria improve student outcomes and ensure that a school that exits no longer meets the criteria under which the school was identified)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE proposes that “schools will exit Comprehensive Support status if they no longer meet eligibility criteria of initial identification when the lists are re-run in three-year cycles. We also recognize that there may be situations where schools are making substantial progress, even if they have not met the exit criteria within three years” (page 33). OSSE does not define what progress, nor “substantial progress” is towards meeting student and school academic achievement and improvement goals are. OSSE does not state how this criteria is or is not aligned with state long term goals or measurements of interim progress. OSSE does not provide an explanation for how the exit criteria would ensure continued progress to improve student academic achievement and school success in the State.
<i>Strengths</i>	OSSE provides for additional time for schools to exit status, if they are on a trajectory of improvement. If schools are making substantial progress, even if they have not met the exit criteria within three years, they will be provided with an additional year to continue LEA-led intervention and have an opportunity to exit status.
<i>Weaknesses</i>	OSSE does not provide a clear definition of its exit criteria for schools receiving comprehensive support and improvement. Only brief exit criteria and the timeline were provided. Details should be provided with examples that would show how they consider each one of their CS1, CS2, and CS3 schools for this exit requirement. OSSE provides no evidence or description of how they will assure that schools exiting the criteria can or will sustain their growth toward improved academic outcomes and school success.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE should provide the definition of the term “substantial progress” mentioned on page 33 within the application. OSSE should provide clarity and details on how it will determine that their CS1, CS2, and CS3 schools have met the exit criteria from the state’s system of comprehensive support and improvement for schools. OSSE should consider linking these criteria to their interim and long term goals and framework of supports. OSSE should consider including strategies as to how they will assure that these schools in exit status will be able to sustain their trajectory of improvement.

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

- Does the SEA describe its statewide exit criteria for schools receiving additional targeted support under ESEA section 1111(d)(2)(C), which may include how the exit criteria align with the State’s long-term goals and measurements of interim progress and the requirement that the

goals and measurements of interim progress take into account the improvement necessary to close statewide proficiency and graduation rate gaps?

- Does the SEA’s description include the number of years within which schools are expected to meet such criteria?
- Do the exit criteria ensure continued progress to improve student academic achievement and school success in the State (e.g., do the exit criteria improve student outcomes for the subgroup or subgroups that led to the school’s identification and ensure that a school that exits no longer meets the criteria under which the school was identified)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE proposes that “Schools will exit Targeted Support status if they no longer meet eligibility criteria of initial identification when the lists are re-run. If a school has a specific group of students that performs at the level of the bottom 5 percent of Title I schools overall for two years in a row, it becomes TS2. If progress is not shown after three years from the initial year of identification as TS1, the school will escalate to Comprehensive Support designation” (page 34). OSSE does not define what progress towards meeting student and school academic achievement and improvement goals is. Exit criteria may not be aligned to OSSE’s long term goals for student growth and proficiency as a school could exit status and still be just outside of the identification band.
<i>Strengths</i>	
<i>Weaknesses</i>	OSSE did not provide specific examples to demonstrate how the calculation would result in school identification; they only provided brief definition and timeline for identification of schools. The criteria OSSE establishes for exiting these schools from TS2 status does not take into account the improvement necessary that the school must maintain in order to close proficiency gaps and how this is related to the state’s long term goals and measurements of interim progress. This puts the school in danger of reentering TS1 status in a subsequent year. While OSSE provides an expanded explanation of its system of support and improvement, it does not address this sustainability issue.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE should define what “continued progress” towards meeting student and school academic achievement and improvement goals is (see pg. 34). OSSE should provide evidence of exit criteria aligned to OSSE’s long term goals for student growth and proficiency.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE describes a variety of supports and oversight intervention for schools identified through the STAR system, including technical assistance, optional supports, and foundational training conferences. OSSE does not provide any concrete school-based actions that will be required for schools that fail to exit identification criteria other than plan generation and improvement plan monitoring by the Department. Based on schools being identified for comprehensive support for the first time in fall 2018, with a minimum of three years of LEA-led interventions, the earliest that the state intervention would take place is in 2021-2022 school year.
<i>Strengths</i>	OSSE is seeking to develop tailored solutions in consultation with stakeholders. OSSE is committed to using a thoughtful process that considers the particular context of a school and LEA that has led to its identification for comprehensive support, feedback, and engagement with the parents in a school community and stakeholders and careful review of multiple proposals for how to move forward and improve.
<i>Weaknesses</i>	OSSE does not provide information as to what a “more rigorous state-determined action” might be. There is no specific information about how local school leaders and school staff are involved in the process of determining these more significant actions.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>Three peer reviewers are of the opinion that plan making is not prescriptive action. Three peer reviewers suggest a more rigorous state determined action required for schools beyond plan making, aligned with state’s long-term goals for student academic outcomes. OSSE should provide rigorous school-based actions that will be required for schools that fail to exit identification criteria other than plan generation and improvement plan monitoring by the Department.</p> <p>In addition, OSSE notes on page 31, ” Note that nothing in this statewide accountability system is designed or intended to forestall, impede, mitigate, interfere with, or delay action by the DC Public Charter School Board or any other eligible chartering authority with respect to amendments, revocation, non-renewal of any school's charter as provided for in the DC School Reform Act.” This statement, however, fails to acknowledge the core authority of DCPCSB as a charter authorizer and holder of the charter contract with public charter boards in DC. It is unclear if low-, under- and chronically underperforming public charter schools in DC will be required to undergo a school improvement planning process with OSSE if identified as CSI, or if they will be governed by the DC School Choice Act and the terms of their charter contract and performance contract with DCPCSB.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE proposes an annual risk-based monitoring process for identified schools. OSSE reiterates provisions in statute and states that it will periodically conduct resource allocation review to support each LEA in the state serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement. OSSE reports that it will “conduct resource allocation review for all LEAs with 10 or more of their schools identified for Comprehensive or Targeted support, or 60 percent of their schools identified for Comprehensive support, whichever is lower.” OSSE reports that it will incorporate its data review for resource allocation as part of its annual review for schools that receive comprehensive support. The state review will be a review of LEAs and school-level resources among and within schools. These include: Per-pupil expenditures of federal state and local dollars, differences in rates by which low-income and minority students are taught by ineffective, inexperienced or out-of-field teachers, access to advanced and accelerated coursework, access to full day kindergarten and to preschool programs, and access to specialized instructional support personnel.
<i>Strengths</i>	OSSE’s proposed resource review process appears to be appropriate and relevant to the needs of schools requiring comprehensive and targeted support. OSSE will review LEA and school-level resources including per-pupil expenditures of Federal, State and local funds, differences in rates of ineffective, out of field, or inexperienced teachers, access to advanced coursework, access to full day kindergarten and to preschool programs and access to specialized instructional support personnel (school counselors, school social workers, school psychologists, and school librarians).
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	One reviewer commented that OSSE should provide additional information on how the resource reviews will be conducted, by whom, and the timeline OSSE will use to guide resource reviews across the District.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>OSSE describes a variety of supports and oversight intervention for schools identified through the STAR system, including technical assistance, optional supports, and foundational training conferences. OSSE does not provide any concrete school-based actions that will be required for schools that fail to exit identification criteria other than plan generation and improvement plan monitoring by the Department. OSSE states that it expects to support a broad range of interventions and improvement strategies.</p> <p>OSSE 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. OSSE emphasizes that the technical assistance will be in identifying evidenced-based interventions. OSSE will begin in the 2017-2018 year to work with schools that are at risk for identification in order to do some preplanning for school improvement. OSSE will share with schools catalogs and resources that have these evidenced based strategies, including What Works Clearing House by USED and resources from other states. OSSE will review school plans and how they will implement these strategies in their grant applications for school support. OSSE will work with the site to collect data that results from the use of the intervention plan and will share its findings with the site at their annual review.</p>
<i>Strengths</i>	OSSE’s belief in terms of seeking school improvement is that LEAs are uniquely positioned to design approaches to improvement that are suited to their local contexts and the root causes for their current performance. OSSE will communicate to LEAs with schools likely to be identified for Comprehensive or Targeted Support based on their prior data to advanced support planning and preparation for an approach to school improvement.
<i>Weaknesses</i>	OSSE technical assistance and intervention appears to be heavily focused on planning and plan generation; rather than requiring or expecting schools to make quick and urgent action to address school conditions and operations that have led to student academic underperformance.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or</i>	OSSE should provide detailed information on whether the technical assistance provided will improve student outcomes. OSSE should provide an explanation of how technical assistance provided will assist schools in

<i>clarification that an SEA must provide to fully meet this requirement</i>	achieving the state’s interim and long-term goals.
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A.4.viii.f: If Applicable, Additional Optional Action

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE states that it will publish minimum standards for reporting of teacher data that would apply to all public schools in the District, ensuring a baseline of comparable, accurate and transparent reporting from all LEAs regardless of their chosen evaluation system. OSSE will include definitions of terms in its minimum standards, including the definition of effectiveness. OSSE does not describe the extent that minority students are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers; nor does it 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.
<i>Strengths</i>	OSSE seeks to ensure that LEAs have autonomy to implement the educator evaluation systems that best meet their school and network needs.
<i>Weaknesses</i>	OSSE proposes to set standards and definitions and publically report data, but does not provide a timeline for this process, nor set any definition to these standards. In addition, OSSE does not provide information on the current state of students' disproportionate rates of access to educators as required by the statute.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to</i>	OSSE does not describe the extent that low-income and minority students are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers; nor does it describe the measures (e.g., data used to calculate the disproportionate rates) that it will use to evaluate and publicly report how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers. OSSE should share any

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.

<i>fully meet this requirement</i>	data sets that describe the extent that low income and minority students are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers for all public schools in the District in schools assisted under Title I, Part A. Due to the fact OSSE stated that they would develop common definitions for teacher quality, yet did not include these definitions in its Plan, OSSE should include these definitions for the terms ineffective, out-of-field, and inexperienced as they refer to teachers within the District in future Plan submissions.
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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?

<i>Peer Response</i>	
<i>Peer Analysis</i>	OSSE provides a listing of resources, collaboratives, surveys and supports it provides to DCPS and public charter schools in DC, including resources that target student bullying and harassment.
<i>Strengths</i>	OSSE provides the following supports for schools and LEAs to improve school conditions – Combating Bullying and Improving School Climate pilot, Health and Wellness Standards and Assessment, Rigorous Academic Standards in arts, health and physical education, science, social studies, technology and world language, Tiered Technical Assistance and Intervention Model, Rigorous Instruction and Transition Support for Students with Disabilities, Family and Community Engagement Framework, and Partnerships with External Agencies.
<i>Weaknesses</i>	OSSE includes a limited range of identified supports to schools and LEAs for English learners. It identifies membership in the WIDA consortium as a support, however, being a WIDA consortium member does not equate to effective instructional and social-emotional supports for English learners.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE should provide specific measures on how LEAs will reduce the overuse of discipline practices that remove students from the classroom and how it will reduce the use of aversive behaviorist interventions that compromise student and school health and safety.

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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE provides a listing of resources, collaboratives, surveys and supports it provides to DCPS and public charter schools in DC, including resources that address middle grade transitions and potential student drop outs. OSSE describes an expansive list of various programs, supports and technical assistance programs that focus on transition from Pre-K to elementary school and from high school to post graduate study of work. These initiatives include ‘Improving Coordination for the Transition from Early Education to K-12’, Quality Improvement Network’, ‘Quality Rating and Improvement System’, and ‘Early Development Instrument’. OSSE in collaboration with Raise DC launched in 2016 a data sharing initiative for schools to quickly, securely, and consistently transfer critical student data for rising ninth grades to their new LEAs. OSSE provides resources to support students as they transition from Secondary Education to College and Careers. OSSE did not include strategies in transitioning from elementary school to middle school.
<i>Strengths</i>	OSSE has demonstrated that they are working on several phases of school transition for students including transition from middle to high school.
<i>Weaknesses</i>	It was unclear to the peer review team how the initiatives in DC constitute a system of support as opposed to a series of actions. OSSE did not include strategies in transitioning from elementary school to middle school.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE did not provide strategies for the transition from elementary to middle school in alignment with the criteria. OSSE should provide an explanation of transition of students from elementary to middle school in their plan.

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE’s response to this indicator meets the minimum statutory requirements by providing an overview of its process and procedures for identifying English language learners, including assessing home language within 30 days of a student entering a public school in the District. OSSE states “These procedures have been shared with Title III grantees, and grantees are monitored biennially to ensure compliance. However, through LEA technical assistance sessions and stakeholder feedback, we have identified the need to strengthen awareness of standardized procedures across all LEAs, potentially make modifications to exit criteria, and provide intense LEA training on the identification and exiting process” (page 53). Page 55 of the State Plan contains a flow chart that depicts EL identification and exit. OSSE has a single, standardized approach to exiting EL students – assessment of 5.0 on ACCESS 2.0.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE’s response to this indicator meets the minimum statutory requirements by providing details of the manner in

	which it will assist eligible entities in meeting state-designed long term goals for ELP and in assuring that these eligible entities are able to support students in meeting the requirements of succeeding in the state’s challenging State academic standards. These strategies include the WIDA consortium Standards and Professional Development Materials, developing and distribution of the English Learner Guidebook, sponsorship of the EL Summer Symposium, development of a Post-Baccalaureate Certificate Program and their ongoing year-round efforts in training and technical assistance to LEAs across the state.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

- Does the SEA describe how it will monitor the progress of each eligible entity receiving a Title III, Part A subgrant in helping English learners achieve English language proficiency?
- Does the SEA describe the steps it will take to further assist eligible entities if the strategies funded under Title III, Part A are not effective, such as by providing technical assistance and support on how to modify such strategies?

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSSE describes its Federal program monitoring using a risk based monitoring approach for all Title III recipients, including conducting “on-site monitoring of LEAs receiving federal Title III, Part A grants using OSSE’s risk-based monitoring approach. The monitoring reviews will include a program and fiscal review of LEAs receiving supplemental federal funding for English Learners” (page 58).
<i>Strengths</i>	The state hosts ongoing gatherings for LEAs and delivers technical assistance to specific points of contacts from schools and LEAs. These meetings enable practitioner communities to support upcoming implementation of key projects, troubleshoot common problems, and gather feedback from key user to inform policy and advance training tools and resources. Dedicated teams of OSSE staff are assigned to each LEA to provide a ‘one-stop shop’ approach for LEAs that need support navigating the requirements. OSSE has shifted to a risk-based monitoring approach for core K-12 grants that emphasizes the use of programmatic and fiscal data to drive technical assistance and support.
<i>Weaknesses</i>	OSSE’s overview of its risk monitoring protocol and technical assistance work does not make clear whether the

	LEA institutes have specific content pertaining to Title III.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSSE describes a model of risk based monitoring, however it is unclear from information provided that this risk analysis is triggered by issues pertaining to Title III program implementation. Information about the LEA Institutes does not contain specific information regarding Title III content. In order to comply with these criteria, OSSE must submit evidence that they will monitor each eligible entity receiving a Title III Part A sub grant and how it will support these entities in ensuring that the needs of English learners are met.