

# STATE PLAN PEER REVIEW CRITERIA Peer Review Panel Notes Template

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STATE: Delaware



**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,<sup>1</sup> does the SEA describe, regarding the 8<sup>th</sup> 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>	Page 28 – N/A. The state does not administer an end-of-course mathematics assessment.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all</i>	<input type="checkbox"/> Yes (# peer reviewer(s))

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<sup>1</sup> In order for an SEA to exempt an 8<sup>th</sup> grade student from the mathematics assessment typically administered in 8<sup>th</sup> 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 8<sup>th</sup> 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).

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

### 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>	Delaware Department Of Education defines languages other than English present to a significant extent in the participating student population as “Any language present statewide in at least 5% of the EL population in tested grades.” DDOE identifies Spanish in grades 3-8 and grade 11, Haitian Creole in grades 3-8 and 11 and Arabic in grade 11. DDOE designates Spanish as the most populous language. DDOE offers no explanation how it considered languages that are spoken by distinct populations and which are spoken by a significant portion of the student population in Local Education Agencies and across grade levels.
<i>Strengths</i>	DDOE identified two significant languages for grades 3-8 and three significant languages in Grade 11 against its definition. In addition, DDOE identifies Spanish as being spoken by a significant number of students in the state.
<i>Weaknesses</i>	The tables on page 29 of the application are inconsistent with the definition of significant languages spoken by students in the participating student population. It is unclear if the numerical values on the table represent the number of English learners in the grade or the number of English learners who were administered assessments in those grades.

	DDOE does not show how it considers or counts languages other than English spoken by distinct populations of English learners statewide – it only shows languages spoken by English learners in tested grades. DDOE also does not represent student counts by percentage, as identified by the state’s definition.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <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>	DDOE should be required to revise the tables on page 29 to provide the number and percentage of English learners by language spoken in the state based on their enrollment in all grades in the state.

### 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>	DDOE provides assessments in Spanish in grades 3-8 in mathematics and science. The Smarter Balance Assessments supply only translated glossaries for grades 3-8 in Arabic, Chinese and Vietnamese. DDOE reports that this same accommodation is not available for Haitian Creole. DDOE reports that directions for the SAT have been translated into all 5 of the most populous languages. DDOE does not specify that any translation of the SAT is available in Haitian Creole. DDOE reports that students taking the SAT during the day will have access to bilingual glossaries in each of the 5 top most populous languages and that students are permitted to take extended time in completing the SAT assessment. Bilingual glossaries and translated test directions constitute only accommodations for English Learner students.
<i>Strengths</i>	DDOE has provided translated 3-8 math and science assessments for the majority of languages other than English spoken by its students. DDOE is attempting to meet (sometimes in a limited manner) the native language requirement for the 5 most populous languages.
<i>Weaknesses</i>	DDOE appears to be conflating a variety of accommodations and adaptations such as glossaries, trans-adapted, and translated directions and providing extended testing time with the provision of languages other than English.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer(s)) <input checked="" type="checkbox"/> No (3peer reviewer(s))

<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should clarify which existing assessments are provided in languages other than English.
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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>	DDOE reports that Spanish is not available for the SAT in mathematics and that Haitian Creole is not available for any of the tested grades or subjects.
<i>Strengths</i>	There are multiple testing supports such as glossaries and directions in other languages that are in place and are continuously reviewed and expanded.
<i>Weaknesses</i>	The SAT mathematics assessment is not currently available in Spanish for Spanish speaking students in Delaware.  DDOE is dependent upon the Smarter Balanced Consortium and the College Board to make the needed assessments available.  DDOE does not mention the need for reading/language arts assessments in the native language.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should identify that assessments are needed in languages other than the two most frequently spoken languages.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>DDOE is a member of the Smarter Balanced Assessment Consortium, with access to the English Language Learners Advisory Committee, as well as the multi-state consortium with the College Board for the administration of the SAT and is working with the College Board on the development of supports for students whose first language is Spanish. The DDOE has presented a plan to “further address needs in this area” that includes investigating supports for English learners, looking for additional translation supports, and developing additional science assessments.</p> <p>The only reference to timelines is for development of science assessments.</p> <p>The DDOE indicates that it uses established meetings with various groups representing the education community to gather feedback on assessments that are needed.</p>
<i>Strengths</i>	<p>DDOE is a member of the Smarter Balanced Assessment Consortium, with access to the English Language Learners Advisory Committee, as well as the multi-state consortium with the College Board for the administration of the SAT and is working with the College Board on the development of supports for students whose first language is Spanish. Participation in Smarter Balance and College Board consortia may lead to additional assessments becoming available.</p> <p>Science assessment development has begun for languages but DDOE does not specify the languages for which this is being developed.</p>
<i>Weaknesses</i>	<p>The lack of a specific assessment in math for all listed languages and especially for Haitian Creole is troubling.</p>

	<p>The response does not provide an explicit explanation or plan(s) for the development of student academic assessments in target languages specified in the previous sections. DDOE does not provide a specific strategy or timeline for the development of academic assessments in these languages. Assessment instructions and glossaries in multiple languages is helpful but not complete in providing equal access.</p> <p>The DDOE describes the current efforts to collaborate with the Smarter Balanced Assessment Consortium and consortia of states participating in the SAT as the high school accountability assessment. However, not all criteria specified in this item are met.</p> <p>It is not clear how meaningful input was solicited. Input from parents and families of English learners and students as appropriate is missing.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>DDOE should provide a process and timeline for developing needed assessments.</p> <p>DDOE should provide additional information regarding stakeholder engagement particularly for parents and families regarding these assessments.</p>

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	DDOE lists on page 41 of the application “all students, American Indian, African American, White, Hawaiian/Pacific Islander, Asian, Hispanic, Multiracial, SWD, EL, Low SES” as subgroups included in the DDOE accountability system.
<i>Strengths</i>	
<i>Weaknesses</i>	Two reviewers expressed a concern that each student is assigned to a subgroup or subgroups for which they share characteristics. For example, if a student is African American, has a learning challenge and qualifies for a free lunch, then that student should be placed in 3 subgroups as well as the all student group. DDOE does not provide information if it is employing “super subgroups” or if they are appropriately assigning students to each subgroup or

	subgroups for which they as individuals share a characteristic.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	NA
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<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>	DDOE selected “other” in its response to this criteria, proposing an alternative option for recently arrived English learner students. DDOE proposes to define recently arrived English learner students as an English learner whose enrollment in any public school in the US has been less than 12 cumulative months. DDOE proposes on page 43 of their application that in Year 1 a newly arrived student would be provided an exception from the ELA participation requirement and mathematics results would be recorded but not used for accountability. In Year 2 ELA and mathematics results would be reported but not used for accountability. In year 3 ELA and Mathematics results would be included in the growth indicator only. In year 4 ELA and mathematics results would be fully included in accountability.
<i>Strengths</i>	DDOE’s proposal takes into account the needs of recently arrived English learners to acclimate to the classroom and to instruction.
<i>Weaknesses</i>	DDOE’s proposed option is not allowable under the law. If DDOE’s plan were to be implemented it would extend the time that certain students would not be a part of the accountability system and the proposal could result in some English learners who could meaningfully participate in assessments not being afforded the opportunity to do so.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should either select one of the three specified options or provide a justification for their proposal and submit a waiver request to the Secretary to receive permission to implement its proposal.

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>	DDOE proposes to set minimum “n” size at 15 students and that this “n” size will apply to each subgroup of students as well as to all students.
<i>Strengths</i>	The DDOE adjusted the current accountability “n” size from 30 to 15, which is consistent with current reporting rules and eliminates the disparity between the current “n” size for accountability (30) and for reporting (15).
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s))
<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?<sup>2</sup>

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<sup>2</sup> 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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The application provides impact data on the use of an n-size of 15, but provides no supporting evidence for their assertion that such a n-size is statistically sound.
<i>Strengths</i>	DDOE's accountability system does not average data across years or subgroups, to ensure maximum inclusion and transparency of each subgroup.
<i>Weaknesses</i>	DDOE offers no explanation of the manner in which they have determined that the "n" size is statistically sound.  DDOE provides confusing impact data. Only a single table is provided to show the number of students who would be included in accountability calculations and a single table about the number of schools. However, one would expect that impact would vary depending on the measure, so it is unclear to what these tables refer. Also the two tables seem to provide different answers. For example, the first table indicates that 14 African-American students would not be included if the n-size were 10, but the second table indicates all 215 schools in the state would be held accountable for the African-American subgroup if an "n" size of 10 were utilized.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should provide evidence that their decision of an "n" size is statistically sound.  DDOE should disaggregate the impact data based on each accountability indicator.

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?

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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>Peer Response</i>
<i>Peer Analysis</i>	DDOE proposes to change the “n” size from 30 students to 15 students in response to feedback from stakeholders and in alignment with reporting rules. DDOE failed to delineate the methodology used to determine the minimum “n” size as well as the manner in which they sought feedback and collaboration with various educator, parent and stakeholder groups.
<i>Strengths</i>	DDOE attempts to provide impact data by providing a table on page 45 of their application that illustrates how decreasing “n” size will minimize the exclusion of subgroups in accountability.
<i>Weaknesses</i>	<p>DDOE offers no explanation of how they have determined that the “n” size is statistically sound.</p> <p>DDOE provides impact data that is confusing. Only a single table is provided to show the number of students who would be included in accountability calculations and a single table about the number of schools. However, one would expect that impact would vary depending on the measure, so it is unclear to what these tables refer. Also the two tables seem to provide different answers. For example, the first table indicates that 14 African-American students would not be included if the n-size were 10, but the second table indicates all 215 schools in the state would be included in the accountability system with an “n” size of 10.</p> <p>DDOE provides no explanation of how educator, parent and stakeholder input impacted the DDOE decision regarding “n” size</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>DDOE should provide a clear description of the methodology used in determining the minimum “n” size.</p> <p>DDOE should provide impact data regarding the minimum “n” size for each indicator. DDOE should provide additional information regarding the impact of stakeholders in decisions regarding “n” size.</p>

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?<sup>3</sup>

	<i>Peer Response</i>
<i>Peer Analysis</i>	DDOE uses a two-tiered approach to disclosure avoidance. The description provides little detail in describing their efforts regarding disclosure avoidance. DDOE states that when reporting aggregate counts for small subgroups (smaller than 15 count), it suppresses aggregate data. When reporting student percentages, true percentages will be capped if percentages and counts compromise student privacy.
<i>Strengths</i>	
<i>Weaknesses</i>	DDOE provides insufficient details and examples regarding the approach used.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should be required to provide sufficient details and examples regarding the approach that they use.

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>

<sup>3</sup> See footnote 5 above for further guidance.

<i>Peer Analysis</i>	N/A
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<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>	<p>DDOE proposes to continue to maintain the gap closing methodology that it submitted in its ESEA flex waiver. The DDOE identifies and describes long-term goals for all students as measured by grade level proficiency, for all students and for each identified subgroup. The DDOE identifies baseline data for students, and includes a timeline for meeting goals. The long-term goals are not ambitious based on feedback from 3 out of 4 reviewers.</p> <p>It is noted that DDOE continues to consult with stakeholders regarding these targets.</p>

	Based on the majority of feedback received from stakeholder groups, the DDOE’s long term goals will be established by decreasing the percentage of non-proficient students in each subgroup by 50% by 2030.
<i>Strengths</i>	One reviewer expressed that DDOE has clearly demonstrated this methodology will work to close any existent achievement gaps among subgroups.
<i>Weaknesses</i>	<p>Three reviewers held the position that the long-term goals are not ambitious and do not support the states mission that “Every learner ready for success in college, career, and life.” In 2030, in ELA and math in tested grades 3-8, DDOE has set low performance expectations for many students, including some of the most historically at-risk and underserved students. At no time does the state expect more than half to two-thirds of English learners, African American students, students with disabilities (for example) to achieve proficiency on state assessments.</p> <p>The DDOE also states that ‘the DDOE will revisit long-term goals once they have three years of data to determine whether the goals are still ambitious and achievable’. There is insufficient explanation on why this may be necessary. According to the table provided, the starting point is in 2015-16, however, the DDOE mentioned that they have established long-term and interim subgroup proficiency targets beginning in 2017-2018 (page #8).</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer(s)) <input checked="" type="checkbox"/> No (3 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>DDOE should be required to defend that the goals are ambitious and are aligned with the states mission of College and Career Readiness.</p> <p>DDOE should provide evidence as to the necessity of revisiting the Long Term Goals in 3 years.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	DDOE provides measures of interim progress towards meeting long-term goals for all students and for each identified subgroup of students. DDOE used three-year interim benchmarks to 2030.
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Two reviewers assessed that there wasn’t enough rigor with regard to performance.</p> <p>DDOE’s application on pages 5-8 establishes grade-specific long-term goals in ELA and math but does not provide associated measures of interim progress.</p>

	Two reviewers expressed the concern that DDOE’s measurements of interim progress are only incremented every three years.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewer(s)) <input checked="" type="checkbox"/> No (2 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should be required to defend the rigor with regard to their goals of interim progress. If DDOE decides to revise its application regarding long-term goals in ELA and math then they should align measurements of interim progress that relate to its long-term goals.

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>	DDOE establishes measures of interim progress towards meeting long-term goals for all students and for each identified subgroup of students. DDOE used three year interim benchmarks to 2030. DDOE uses a gap closing methodology, expecting larger gains in proficiency for subgroups that start with a lower aggregate proficiency baseline in the 2015-2016 school year.
<i>Strengths</i>	
<i>Weaknesses</i>	<p>One reviewer held the position that DDOE provides insufficient information and data that takes into account the improvement necessary for subgroups of students who are behind in reaching these goals to make significant progress in closing statewide proficiency gaps. DDOE does not provide information that reflects how the Individualized Education Plan’s (IEP’s) for students with disabilities (SWDs) will reflect the need for improvement. The goals are not ambitious and may therefore result in IEP’s that reflect the lack of rigor that may result.</p> <p>Two reviewers held the position that given the 14 year period at which the long-term goals were expected to be achieved, that the amount of progress on closing statewide proficiency gaps is not significant. For example, at no time does the state expect more than half to two-thirds of English learners, African American students, students with disabilities (for example) to achieve proficiency on state assessments.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewer(s))

	<input checked="" type="checkbox"/> No (2 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should provide sufficient information and data that takes into account the improvement necessary for subgroups of students who are behind in reaching these goals to make significant progress in closing statewide proficiency gaps.

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>	DDOE identifies and describes long term goals for the four year adjusted cohort graduation rate for all students and for each subgroup of students. DDOE’s description includes baseline data and timeline for students to meet goals. Three of the four reviewers thought that the long-term goals are ambitious and one reviewer disagreed.
<i>Strengths</i>	
<i>Weaknesses</i>	DDOE LTGs for 4-year adjusted cohort graduation rate is 12 years. The period of time is too long and the goal is not ambitious nor is it rigorous. In other words, if the length of time is 12 years then the goal for a 4 year ACGR should be >95%. If the length of time was 6 years or less than the stated goals are both ambitious and rigorous as well as achievable.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should clarify the inconsistencies between table on pg. 10, i.e. 81.8% starting point graduation rate for African Americans and the 81.1% graduation rate for African-Americans on pg. 125.  DDOE should consider resubmitting data for a long-term goal to a 6 year period.

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>	The DDOE currently calculates and reports five-year and six-year adjusted cohort graduation rates and it will continue to calculate and report both five- and six-year adjusted cohort graduation rates.
<i>Strengths</i>	DDOE incorporated feedback from stakeholder groups when considering to continue to report both five- and six-year adjusted cohort graduation rates.  Two reviewers held the position that the ultimate long-term goals (LTG) in 2030 are rigorous for all students and each sub-group. The decision to continue to report these extended-year rates was based on the feedback received from the stakeholder groups.
<i>Weaknesses</i>	Two out of four reviewers hold the opinion that DDOE has not submitted ambitious and rigorous LTGs for the 5 and 6 year adjusted cohort graduation rate (ACGR). The length of time is too long to achieve such modest goals. DDOE has not set LTGs for the 5 and 6 year ACGR that are more rigorous than the LTG for the 4-year ACGR. They are determined in the same way that the LTG is set for the 4-year ACGR which is a 50% reduction in the number of non-graduates.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewer(s)) <input checked="" type="checkbox"/> No (2 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should clarify data on page 11 of their application regarding the 6-year ACGR. The data on this table does not match the data for the 6-year ACGR on page 125 in the Appendix.  DDOE should provide clarification on whether they include students that attended through summer following the academic year.  DDOE should provide clarification and evidence that the 5 and 6 year ACGR is more rigorous than the 4-year

	ACGR.
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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>	DDOE provides measurements of interim progress towards long-term goals for four, five and six-year adjusted cohort graduation rates. DDOE used three year interim benchmarks to 2030.
<i>Strengths</i>	
<i>Weaknesses</i>	DDOE provides a misalignment between the body of the application and tables provided within the Appendix. On page 11 of their application regarding the 6-year ACGR data, there is a discrepancy between this data and that which displayed on page 125 of the Appendix.  Two reviewers expressed the concern that DDOE’s measurements of interim progress are only incremented every three years.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewer(s)) <input checked="" type="checkbox"/> No (2 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should clarify data on page 11 of their application regarding the 6-year ACGR. The data on this table does not match the data for the 6-year ACGR on page 125 in the Appendix.  DDOE should provide clarification on whether they include students that attended through summer following the academic year.

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>	DDOE establishes measures of interim progress towards meeting long-term graduation rate goals for all students and for each identified subgroup of students. DDOE used three year interim benchmarks to 2030. DDOE uses a gap closing methodology, expecting larger gains graduation rates for subgroups that start with a lower graduation rate baseline in the 2015-2016 school year.
<i>Strengths</i>	
<i>Weaknesses</i>	Three out of four reviewers indicated that these goals are not ambitious.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s))
<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>	DDOE offers baseline information and long-term goals that are measures of English language proficiency based on both “percent of students meeting growth target” and “Average Percent of Growth Target Attained.” It is unclear to what “Average Percent of Growth Target Attained” refers.
<i>Strengths</i>	DDOE considers entering proficiency level of English learners and a student’s grade level/grade band.
<i>Weaknesses</i>	DDOE’s plan is unclear on an individual students’ progress over time, that is, how the approach will acknowledge and accommodate non-linear growth or improvement in English language acquisition/proficiency. The model sets a six-year re-designation time-out, while expecting a student to progress one ACCESS level per year.  DDOE does not provide clarity regarding how the growth index is computed. The goal of taking fifteen years to have all schools reach what is currently the 70 <sup>th</sup> percentile of schools seems to be at best marginally ambitious.

	DDOE describes a growth to target model over a 15-year period that results in only modest increases in the percentage of English learners making progress in achieving English language proficiency. Growth to target models lack transparency and are difficult to communicate to parents, stakeholders, and the public.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s) )
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should explain the relationship between scaled scores and ACCESS P-level.  DDOE should clearly explain why these goals should be considered ambitious.  DDOE should provide greater clarity in how the average percent of growth target is achieved.

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>	Two reviewers held the opinion that DDOE does not specifically provide measurements of interim progress toward the long-term goal. DDOE states that interim targets will be established yearly based on the previous year’s performance. Points will be awarded of varying amounts based on progress in attaining the interim progress targets. It is difficult to determine if this methodology will result in improved outcomes for EL students. These expectations are not aligned with ambitious outcomes.  Two reviewers indicated that DDOE had met this requirement for providing interim measures for 2019, 2022, 2025, and 2028.
<i>Strengths</i>	
<i>Weaknesses</i>	Two reviewers hold the opinion that DDOE’s methodology does not yield definitive measurements of interim progress in the percentage of English learners making progress in achieving English language proficiency. Therefore, DDOE has not expressed with clarity how this method will allow for a variable growth trajectory depending on each student’s progress over time while still requiring that the attainment targets be reached within the required number of years.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewer(s)) <input checked="" type="checkbox"/> No (2 peer reviewer(s))

<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>DDOE provides a table that includes measurements of interim progress (pg. 125); however, DDOE should clarify and demonstrate that the underlying methodology meets the linguistic needs of all EL students.</p> <p>DDOE should provide examples of the application of this method.</p>
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**A.4.iv: Indicators (ESEA section 1111(c)(4)(B), 1111(c)(4)(E)(ii))**

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

**A.4.iv.a: Academic Achievement**

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Existing DDOE accountability system (under ESEA flex waiver) includes many of the new requirements under ESSA. DDOE’s updated accountability system is anchored in academic achievement, growth, on track to graduation, and college and career preparation.</p> <p>DDOE describes the Academic Achievement indicator as Proficiency in ELA (3-8, HS), Proficiency in Math (3-8, HS), Proficiency in Science (5,8, and 10), and Proficiency in Social Studies (4,7, and HS) and uses it for all schools in all LEAs across the state. DDOE has a calculation that is consistent for all schools. DDOE creates a summative index score for each indicator, which is aggregated to generate a numeric score for each indicator. These numeric scores are weighted and combined to generate a summative index score for the school. The summative index score</p>

	<p>is then translated into a text-based identification with three descriptors that correspond to the numeric score. While describing this process for an individual school, DDOE did not clearly state if this method is used for LEA scores or for the state score as well.</p> <p>DDOE utilizes a metric that measures high school 9th graders efforts at being on track for graduation. While DDOE states that they are measuring growth in high school for ELA and mathematics, they do not specifically state how this occurs. DDOE mentions that they are reviewing the use of the PSAT to SAT assessment as a vehicle for measuring this growth. But they offer only a vague explanation of the rationale and methodology for doing so. DDOE also states that they will measure at the high school level the following: Growth of Lowest Quartile and Growth of Highest Quartile.</p> <p>At present, DDOE does not average data across years and/or grades. However, DDOE states that they are considering data averaging.</p> <p>The indicator is based on DDOE’s LTG and can be disaggregated for subgroups of students. DDOE’s indicator is measured by grade level proficiency on the annual statewide reading/language arts and mathematics assessments. The indicator is designed to measure 95% of all students and 95% of all students in each subgroup; however, if schools fail to test 95%, DDOE only provides support and encouragement as well as requiring the development of a plan for how they will comply in the future.</p> <p>DDOE provides no definitive consequence for a school or LEA or for the state should they fail to meet this statutory participation requirement.</p> <p>DDOE indicates that proficiency for ELA and math in grades 3-8 and 11, in science in grade 5, 8, and 10 and in social studies in grades 4, 7, and high school will be used as the academic achievement standard. The indicator is measured by grade level proficiency and is disaggregated to student groups. No explicit information is given on the validity and reliability of the assessments. No information is given regarding how the indicator is based on the long-term goals. Although the academic indicator is weighted 25%, there is no information on the relative weighting of the components of the indicator.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Information provided is very sparse, and includes information on neither the relative weighting of ELA and math nor on how validity and reliability was determined. According to the statute, social studies and science may not be used as an academic achievement indicator.</p> <p>Alignment/growth from PSAT 10 to SAT will not be included in 2016-2017. DDOE is revisiting its school-level aggregate growth methodology, which can’t be replicated currently by schools. It is unclear how DDOE will</p>

	<p>measure HS growth and school wide growth. DDOE does not provide calculations or benchmarks of interim progress for growth and 9th grade on track rates; or for school quality and student success.</p> <p>DDOE does not state if they will produce a summative index score for each LEA and for the state. DDOE presents unclear and vague information regarding the determination of growth in ELA and in mathematics as well as Growth of the Lowest Quartile and Growth of the Highest Quartile in high school. DDOE provides no definitive consequence for a school or LEA or for the state should they fail to meet the 95% statutory participation requirement</p> <p>Growth from the PSAT 10 to the SAT will not be included in 2017-18, which is the baseline for the ESSA accountability. It was noted that a thorough review of resources and a review of technical quality are needed. In the light of this challenge, the DDOE does not provide an alternative measure until this is taking place. The DDOE's DSSF (A Framework of Indicators for School Success) as related to ELP uses the Growth to Proficiency methodology. It is unclear how the DDOE will make sure that there are ELP attainment accountability decisions made each year. There is lack of explanation on 'On Track in 9<sup>th</sup> Grade' under 'Academic Progress' and 'College and/or Career Preparation (9-12)' under 'School Quality/Student Success' sections.</p> <p>The DDOE stated that it will revisit its current school-based aggregate growth methodology, which currently cannot be replicated by LEA staff, which will need further explanation or timeline for plan execution.</p>
<p><i>Did the SEA meet all requirements?</i></p>	<p><input type="checkbox"/> Yes (0 peer reviewer(s))</p> <p><input checked="" type="checkbox"/> No (4 peer reviewer(s))</p>
<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>DDOE must provide additional information regarding the validity and reliability of these indicators.</p> <p>DDOE should remove social studies and science or reclassify them as school quality and student success indicators or for elementary and middle school as the other academic indicator.</p> <p>DDOE should provide the weightings for ELA and math.</p>

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>In public elementary and secondary schools that are not high schools, DDOE utilizes Growth in ELA (4-8), Growth in Mathematics (4-8), Growth to Proficiency (4-8), Growth of Lowest Quartile (4-8) and Growth of the Highest Quartile (4-8) as the Other Academic Indicator. DDOE uses the same indicator and calculates it in the same way for all elementary and secondary schools. DDOE states that they do not currently utilize averaged data across school years but that they are considering using this methodology. DDOE does not use a different indicator for different grade spans. DDOE utilizes only student growth as its Other Academic Indicator.</p> <p>DDOE list several indicators for high school growth. These metrics are misplaced and should be included as academic achievement indicators for high school. In addition, the “On track for High school Graduation Indicator” should be reclassified as a measurement of School Quality and Student Success.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>DDOE is exploring using a different methodology in determining growth but gives neither timeline nor specifics on when that decision will be made. DDOE provides vague and incomplete information regarding the use of averaging of data across school years.</p> <p>DDOE provides no description of the growth model used.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>DDOE should update the application to appropriately place measures that are currently listed under academic achievement into the Other Academic Indicator or School Quality and Student Success categories.</p> <p>DDOE should provide clarity concerning the growth model listed on Pages 35-36. This explanation should provide examples of how the model is computed.</p>

A.4.iv.c: Graduation Rate

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	DDOE describes the Graduation Rate indicator used in its statewide accountability system and provides assurance that it uses the same indicator across all LEAs in the state and does so consistently for all high schools. The indicator is based on the long-term goals and is based on the four year adjusted cohort graduation rate. DDOE also describes the use of a 5 and 6 year adjusted graduation cohort rate for this indicator. The indicator can be disaggregated for each subgroup of students.
<i>Strengths</i>	
<i>Weaknesses</i>	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.  It is not evident how the DDOE is addressing the graduation rates for students with the most significant cognitive disabilities using the alternate academic achievement standards including the students who are dually identified (English Learners with the most significant cognitive disabilities).
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s))

<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>DDOE should provide clarification of how the graduation rates are weighted and combined.</p> <p>DDOE should provide an explanation as to how the indicator is used in relation to long-term goals.</p> <p>DDOE should provide an explanation of how they will address graduation rates for students with the most significant cognitive disabilities including those students who are dually identified as English Learners and as a student with the most significant cognitive disabilities.</p>
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A.4.iv.d: Progress in Achieving English Language Proficiency Indicator

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>DDOE, in consultation with stakeholders, determined that English language growth will be calculated from a students’ proficiency level at point of entry, differentiated by grade level or grade band and including entering proficiency level and entering grade-level score. DDOE will use ACCESS to assess English language proficiency. DDOE provides a definition of English language proficiency on page 28.</p> <p>DDOE describes the Progress in Achieving English Language Proficiency indicator and uses the same indicator across all LEAs across the state. DDOE provides a clear definition of what that progress is but the validity and reliability are not supported in their lack of setting clear and transparent measurements of interim progress. DDOE clearly states that a student has a maximum number of years (6) to achieve ELP but overlay this with a less specific methodology.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>DDOE’s plan is unclear on an individual students’ progress over time, that is, how the approach will acknowledge and accommodate non-linear growth or improvement in English language acquisition/proficiency. The model sets a six year re-designation time-out, while expecting a student to progress one ACCESS level per year. The relationship between scaled scores and ACCESS level is not totally clear.</p>

	<p>The methodology to determine progress and DDOE’s failure to supply clear measures of interim progress makes the reliability and validity of this indicator questionable.</p> <p>There are no clear progressions on the ELP cut scores to demonstrate the adequate and reliable progress in achieving English Language Proficiency Indicator.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>DDOE should provide additional information about this indicator including, clarification of the methodology used.</p> <p>DDOE should provide examples of their calculations used in determining EL proficiency.</p> <p>DDOE should provide information regarding the validity and reliability of this methodology.</p>

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	DDOE uses chronic absenteeism at the elementary and middle school level and College and Career Preparation at the high school level. Although DDOE classifies on track for graduation in ninth grade as a progress measure, the statute may require it to be classified as a Measure of School Quality and Student Success.
<i>Strengths</i>	More than one indicator for school quality and student success is included, for more than one grade band.

	Chronic absenteeism is defined clearly and can be used to differentiate between schools and can be applied to all students.
<i>Weaknesses</i>	<p>DDOE does not provide a clear explanation of the use of College and Career Preparation measure and how it will be calculated. Will these metrics be combined or will they be calculated separately?</p> <p>DDOE does not provide calculations or benchmarks of interim progress for chronic absenteeism and college and career readiness.</p> <p>The use of Chronic Absenteeism as an indicator does not address the issue of School Quality and Student Success for all students. It applies exclusively to only those students who suffer from this issue. It is an indirect measurement of SQ&amp;SS.</p> <p>There is no information provided regarding whether these indicators result in meaningful differentiation, and whether they are valid, reliable, comparable and used statewide in all schools. There is no information on how points are assigned to performance on these indicators.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>DDOE should provide calculations for benchmarks of interim progress for chronic absenteeism and college and career readiness.</p> <p>DDOE should elaborate on meaningful differentiation. Explain how you will convert SQ/SS indicators into a percentage scale.</p> <p>DDOE should provide a rationale that using chronic absenteeism is a better indicator of school quality than other measures suggested by their stakeholders.</p> <p>DDOE should provide information regarding whether these indicators result in meaningful differentiation, and whether they are valid, reliable, comparable and used statewide in all schools.</p> <p>DDOE should elaborate on how points are assigned to performance levels on these indicators.</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>	DDOE states that it will continue its DSSF to categorize the performance of schools, based on academic achievement; academic progress; school quality/student success; graduation rate; and progress towards English language Proficiency). DDOE will report student data for each indicator and disaggregate this data at the school level and LEA level. DDOE will then combine data to create a summative index score for each school, which will translate into a category – exceeds, meets or meets with few expectations. Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI) schools will then be identified. CSI schools will receive the highest level of support.
<i>Strengths</i>	Delaware acknowledges the unique role of public charter schools and public charter school accountability.
<i>Weaknesses</i>	DDOE’s description of its differentiated accountability system is general and process based. The state did not include detail on exactly how schools will be identified, how many schools may be identified, and the nature of supports or improvement expectations.  The system as currently described is vague and leads to concerns about transparency and meaningful impact on all stakeholders but most importantly those of parents.  There is only a general description available within the state plan – no specific explanation on how performances will be measured, how the summative index scores will be translated into an overall text-based identification.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer(s)) <input checked="" type="checkbox"/> No (3 peer reviewer(s) )
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should explain how the summative score is translated into a text-based rating.  DDOE should expand the description of their methodology including examples.

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>	<p>DDOE proposes to weight indicators as follows:</p> <ul style="list-style-type: none"> <li>• Academic Achievement – Proficiency for ELA and math (3-8 and 11), Science (5,8, and 10) and Social Studies (4,7, and HS) – 25%</li> <li>• Academic Progress – Growth in ELA and math (4-8 and HS); on track in 9<sup>th</sup> grade – 35%</li> <li>• School quality/student success – chronic absenteeism (k-12); college and/or career preparedness (9-12) – 20%</li> <li>• Graduation rates – 4, 5, 6, year adjusted cohort graduation rates – 10%</li> <li>• ELP – progress towards English language proficiency (1-12) – 10%</li> </ul> <p>The SEA provides preliminary weightings for the indicators that equal 100%. The SEA indicates that points will be redistributed or subtracted if a school does not have sufficient data on an indicator according to certain business rules</p>
<i>Strengths</i>	<p>75% of weighting is focused on student academic achievement.</p> <p>DDOE uses a differentiated weighting system.</p>
<i>Weaknesses</i>	<p>DDOE does not describe how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students.</p> <p>The indicator of School Quality/ Student Success is weighted at 20% which could negatively impact authentic school differentiation.</p> <p>It is not clear how the system is adjusted when indicators such as graduation rate or ELP are not available. It is not clear how performance on indicators are translated into points.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewer(s))</p> <p><input checked="" type="checkbox"/> No (4 peer reviewer(s))</p>

<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>DDOE should provide updated weighting calculations after reassigning high school components to the Academic Achievement and measures of school quality and student success indicators for high school and after removal of social studies and science from their academic achievement indicator for elementary and middle schools.</p> <p>DDOE should describe how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students.</p> <p>DDOE should clarify how the system is adjusted when indicators such as graduation rate or ELP are not available.</p> <p>DDOE should clarify how performance on indicators are translated into points.</p>
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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>	DDOE uses back-mapping for K-2 schools. Certain schools have their students reassigned to other schools for accountability purposes. There appears to be special provisions for charter schools that serve at-risk students. It appears that certain newly opened schools do not receive an accountability designation.
<i>Strengths</i>	
<i>Weaknesses</i>	DDOE provides a vague and confusing explanation for their 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.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewer(s)) <input checked="" type="checkbox"/> No (2 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>DDOE should provide an accountability designation for new schools.</p> <p>DDOE should provide additional information on how DDOE will differentiate schools with non-tested subjects.</p> <p>DDOE should provide more information on its special provisions for charter schools that serve at-risk students.</p>

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>DDOE states that it will continue its DSSF to categorize the performance of schools, based on academic achievement; academic progress; school quality/student success; graduation rate; and progress towards English language Proficiency). DDOE will report student data for each indicator and disaggregate this data at the school level and LEA level. DDOE will then combine data to create a summative index score for each school, which will translate into a category – exceeds, meets or meets with few expectations. Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI) schools will then be identified. CSI schools will receive the highest level of support. CSI schools will be the lowest 5% of schools in rank order. DDOE will identify schools once every three years, starting in 2017-2018.</p> <p>DDOE intends to rank order all schools (both Title I and non Title I) across all grade bands and will designate the lowest 5% of those rank ordered schools for CSI. It is possible that using this methodology, that not all low performing Title I eligible schools would be included in the lowest 5% ranking. Therefore DDOE could be ranking less than the lowest performing 5% of all schools receiving Title I, Part A funds. DDOE reports that they will first identify schools in November of 2018 which complies with the department’s guidance. DDOE will revise and issue new identifications every three years.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>DDOE states that “the identification of CSI schools will be determined based on an index across all indicators of the DSSF. DDOE will use summative index scores to identify the lowest performing schools in the state.” No further information is provided</p> <p>Using their stated methodology, DDOE could fail in the requirement to identify not less than the lowest 5% of Title I, Part A schools.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer(s))

	<input checked="" type="checkbox"/> No (3 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should provide further explanation on how summative State index scores will be calculated and will be used.  DDOE should assure that they will identify the lowest performing Title I schools within the required 5% of lowest performing schools.  On pg. 49 & 53 DDOE refers to “allocating state school improvement funds to support non-Title I schools.” It is unclear if these are state appropriated funds Title I funds or federal state set-aside Title I funds. Please clarify.

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>	DDOE describes a methodology to identify all public high schools in the State failing to graduate 67% of their students based on a four-year cohort graduation rate data. This methodology will result in the identification of high schools failing to graduate 67% of their students. DDOE will first identify students using 2017-2018 four-year cohort graduation rate data that will enable them to be identified in the 2018-2019 school year.
<i>Strengths</i>	According to the state’s long term goals, the DDOE will focus on closing performance gaps for graduation by 2030.
<i>Weaknesses</i>	If DDOE identifies students in 2018-2019 using 2017-2018 data, then there may not be enough planning time for schools and LEA’s to comply with federal guidance to implement their improvement plans.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this</i>	

requirement

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>DDOE proposes to identify schools with chronically low-performing subgroups and re-identified Comprehensive Support and Improvement Schools (CSI). Chronically low-performing subgroup schools will be any Title I school with at least one chronically low-performing subgroup. CSI-R schools are schools that were identified as Priority Schools under the ESEA flex waiver that have not met those status exit targets, starting in 2017-2018.</p> <p>It is the position of one reviewer that DDOE identifies this group as CSI-3. DDOE fails to delineate a clear methodology for identifying these schools. DDOE seems to only restate the definition for these schools and only describes in general terms methodology for identifying CSI schools. While a methodology is lacking or absent, DDOE states that it will identify all CSI schools in November 2018. The statewide exit criteria is also poorly described by DDOE. It appears to be based on a negotiation of factors between DDOE and the LEA based on the original performance of the CSI school as based in 2018. These factors are not identified and no elaboration or examples are offered to provide clarity to this reviewer. DDOE fails to provide a definition of Additional Targeted Support.</p> <p>CSI-R (CSI Re-Identified Schools) schools are identified as Priority Schools under ESSA FLEX and have not yet met exit targets if they are re-identified under ESSA accountability measures. Schools initially identified under ESSA that do not meet CSI targets within the identification cycle will be re-identified as CSI-R.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>DDOE does not identify exit criteria for these two additional categories of identified schools.</p> <p>DDOE offers little or no explanation of the methodology to identify this category of schools and gives no explanation of exit criteria nor does it provide a clear definition of Additional Targeted Support.</p>

	An Appendix with a process map or flow chart would be helpful. It is unclear if the state identified exit criteria. This section of the state plan mentioned such exit criteria, however, the DDOE did not specify them. The plan also indicated that once schools are identified, the DDOE will negotiate CSI exit targets with LEAs based on the data from the 2017-2018 school year.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewer(s)) <input checked="" type="checkbox"/> No (2 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should provide an explanation of the methodology to identify this category of schools, including clarification of the 5% rule and how it is applied to CSI schools.  DDOE should provide clearer methodology for identifying CSI schools.

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>	CSI and TSI-1 schools are identified every three years; TSI-2 schools are identified annually.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s))
<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>	<p>The DDOE provided the description of two types of Targeted and Support and Improvement (TSI) schools.</p> <p>Low-Performing Subgroup at Level of Lowest 5% of Schools (TSI-1) are schools (Title I or non-Title I) with at least one low-performing subgroup of students that is performing as poorly as all students in any of the lowest-performing 5% of Title I schools (CSI schools).</p> <p>Consistently Underperforming Subgroups (TSI-2) are schools (Title I or non-Title I) that have at least one “consistently underperforming” subgroup. The DDOE has not established a methodology yet.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>DDOE states that schools will be identified annually starting in November 2019; no methodology is described for consistently underperforming subgroup schools.</p> <p>There is an incomplete or nonexistent definition for “consistently underperforming” subgroups of students.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewer(s))</p> <p><input checked="" type="checkbox"/> No (4 peer reviewer(s))</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>DDOE should provide a methodology on how it will identify Targeted support and Improvement schools – “Consistently Underperforming” Subgroups. DDOE should provide examples of their calculations.</p> <p>DDOE should provide a clear definition of this category.</p>

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

- Does the SEA describe its methodology to identify schools in which the performance of any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State’s methodology under ESEA section 1111(c)(4)(D) (*i.e.*, the methodology

described above in A.4.vi.a), including: 1) whether the methodology identifies these schools from among all public schools in the State or from among only the schools identified as schools with one or more consistently underperforming subgroups and 2) if applicable, how the SEA averages data (e.g., does the State use a uniform averaging procedure across all schools)?

- Does the SEA’s methodology result in identification of such schools?
- Does the SEA include the year in which the State will first identify such schools (i.e., does the timeline comply with the Department’s guidance)?
- Does the SEA include the frequency with which the State will identify such schools after the first year of identification?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The DDOE provided the description of two types of Targeted and Support and Improvement(TSI) schools.</p> <p>The Low-Performing Subgroup at Level of Lowest 5% of Schools (TSI-1) are schools (Title I or non-Title I) with at least one low-performing subgroup of students that is performing as poorly as all students in any of the lowest-performing 5% of Title I schools (CSI schools).</p> <p>Consistently Underperforming Subgroups (TSI-2) are schools (Title I or non-Title I) that have at least one “consistently underperforming” subgroup. The DDOE has not established a methodology yet.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Under this criterion, DDOE states that schools will be identified annually starting in November 2019. DDOE provides no methodology for its determination of consistently underperforming subgroup schools.</p> <p>DDOE does not identify schools for TSI from all schools in the state but only identifies from those schools identified as in need of CSI. This may result in under identification of schools.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>DDOE should provide a definition for additional targeted support schools.</p> <p>DDOE should provide an explanation of the methodology used to identify these schools.</p>

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 (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

- Does the SEA describe how it factors the requirement for 95 percent participation of all students and 95 percent of all students in each subgroup of students in statewide mathematics and reading/language arts assessments into the statewide accountability system?
- If applicable, does the SEA describe how the SEA differentiates its approach based on such factors as the number of subgroups in the school missing the participation rate requirement, the length of time over which the school has missed the requirement, or the degree to which the school missed the requirement (e.g., 92 percent participation rate vs. 70 percent participation)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>DDOE states that it is “committed” to the 95% participation rate for all students and for all subgroups.</p> <p>DDOE will report participation rate for schools. If schools do not meet participation rate targets, DDOE will require an improvement plan. For schools that don’t meet the goal multiple years in a row, DDOE will implement “additional actions and interventions as appropriate”</p> <p>It is the position of one reviewer that DDOE does not describe HOW the SEA differentiates its approach based on 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. DDOE states that it will ask each school to submit a plan that will include strategies for meeting participation requirements and for schools that do not meet the participation rate for “multiple years” or do not show sustained improvement in meeting the 95% participation rate to submit a plan and DDOE will implement “additional actions and interventions as appropriate”. No specifics are offered. DDOE also does not mention certain subgroups in their total student population who may not attend a particular school at all or do so in group sizes far below their “n” size.</p>

	<p>It is the position of three reviewers that the DDOE’s description on the requirement for 95% participation for all students and each subgroup is clear and the DDOE is planning to take actions to improve the participation rate for those schools that do not meet this requirement.</p>
<i>Strengths</i>	<p>DDOE states that it is committed to the 95% participation rate.</p> <p>The DDOE will require each school who does not meet the 95% participation rate to submit a plan that includes strategies for meeting participation rate. For schools that do not meet the participation requirement for multiple years or do not show sustained improvement, DDOE will implement additional actions and interventions as appropriate.</p>
<i>Weaknesses</i>	<p>DDOE does not give specifics around “additional actions and interventions as appropriate” required for schools that don’t meet required participation rates.</p> <p>DDOE offers no detail or explanation for how it will factor the 95% participation requirement and offers no detail for consequences for schools that fail to comply.</p> <p>The DDOE does not specify or identify such improvement plans, actions, or interventions.</p> <p>DDOE does not describe HOW it factors the requirement for 95% participation of all students and 95% participation of all students in each subgroup of students in statewide mathematics and reading/language arts assessments into the statewide accountability system.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (3 peer reviewer(s))</p> <p><input checked="" type="checkbox"/> No (1 peer reviewer(s))</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>DDOE should explain more fully the state factors the requirement for 95% participation and how it will differentiate its approach.</p>

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Identified schools have three years to exit from identification status (plus one year of planning), against criteria informed by stakeholder groups. Exit criteria for schools identified for CSI status is the same as the criteria for which the school was identified. Exit criteria are that the school 1) improves student outcomes; 2) no longer meets the criteria for identification of CSI schools. Schools identified for CSI status will be identified every three years. DDOE will identify the first cohort by the end of November 2018 using 2017-2018 school performance data.</p> <p>DDOE states that should CSI schools fail to exit in 4 years, then DDOE offers strategies that follow both a qualitative and quantitative analysis of the school.</p>
<i>Strengths</i>	Schools must exit in 4 years. Stakeholders urge that those schools that exit CSI early continue to be supported by the department in terms of both financial and in expert support to maintain their positive trajectory.
<i>Weaknesses</i>	<p>DDOE fails to establish clear exit criteria for CSI schools.</p> <p>It is unclear if this process of negotiation results in a uniform standard for exiting from CSI status.</p> <p>There is concern that individually negotiated exit criteria means that there isn’t standardized communication or expectation for student academic performance statewide.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>DDOE should explain how exit criteria are linked to state long-term goals.</p> <p>DDOE should explain how schools will be able to continue with improvement measure.</p> <p>DDOE should clarify roles, responsibilities and protocol of negotiation.</p>

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	Schools identified for TSI-1 status will be re-identified every three years. LEAs will have up to one year for improvement planning and up to three years to exit TSI-1 status. The DDOE will identify the first cohort of TSI schools by the end of November 2018 using 2017-2018 data. LEAs and schools will conduct needs assessment and planning prior to implementation by beginning of the 2019-2010 school year. Subsequent cohorts of TSI-1 schools will be identified by November each year. Schools and LEAs will conduct needs assessment between November and May, begin implementation prior to the following school year.
<i>Strengths</i>	
<i>Weaknesses</i>	There is lack of definition of “sufficient progress” in identification cycles for TSI and CSI schools.  DDOE fails to establish clear exit criteria for TSI schools.  There is no mention of alignment to long-term goals and measures of interim progress; it is unclear whether exit criteria are uniform across the state.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should provide a definition of the term “sufficient progress in identification cycles for TSI and CSI schools.”  DDOE should provide consideration of setting exit criteria with respect to closure of achievement gaps either on measurements of interim progress or with respect to LTGs.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>DDOE describes a process by which they will partner with LEAs and schools to identify external partners to conduct qualitative needs assessments, comprehensive needs assessment, evaluate findings of evaluations, and develop action and improvement plans. DDOE does not describe interventions in school level operations or anything other than plan making.</p> <p>DDOE offers an expanded explanation of the more rigorous State-determined action that will be required for schools receiving CSI that fail to meet the state’s exit criteria. DDOE plans to hire a third party evaluator that will conduct an extensive qualitative and quantitative review of multiple facets of school operations, instructional strategies, school culture and environment as well as school and district leadership competency and capacity. The results of this study will be reviewed by the school and district as well as DDOE. Based on the needs assessment the school and district will be required to amend their previous plan to incorporate three factors. These are: 1)”The reasons the school did not meet the exit criteria” 2) the Lea will update how it will “continue to address previous resource inequities”, and 3)”Include the implementation of additional evidence-based interventions in the school <b>that are identified by an external LEA needs assessment</b> and that are more rigorous and based on strong or moderate levels of evidence.”</p>
<i>Strengths</i>	DDOE considered community input.
<i>Weaknesses</i>	<p>DDOE does not describe interventions in school level operations or anything other than needs assessment or plan making.</p> <p>DDOE does not include the level or frequency of monitoring these schools that fail to exit CSI. DDOE does not address how they will assure that more rigorous interventions are educationally sound and how these interventions will improve student outcomes.</p> <p>The additional interventions do not appear as if they would likely be sufficient to dramatically improve student performance.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer(s)) <input checked="" type="checkbox"/> No (3 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>DDOE should clarify how the state will conduct GAP analysis on all students and each subgroup.</p> <p>DDOE should provide subgroup specific data analysis and specific intervention that will be aligned with such root cause analysis.</p> <p>DDOE should provide a more rigorous state determined action required for schools beyond plan making, aligned with state’s long-term goals for student academic outcomes.</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>	DDOE states that LEAs will conduct a needs assessment to assist schools in developing improvement plans using evidence-based strategies. DDOE describes how they will work with LEA’s to review resource allocation for LEAs in the state with a “significant” number or percentage of schools identified for CSI or TSI. These resources include a review of not only rates of personnel who are ineffective, out-of-field, or inexperienced teachers but also expenditures of federal, state and local funds. DDOE repeats compliance language from ESSA that requires review allocation between LEAs that have identified schools and LEAs that don’t have a high number of identified schools. Resource allocation and support provided examples include advanced coursework, preschool programs, instructional materials, and technology (page 65).
<i>Strengths</i>	DDOE has determined a method to review resource allocation.
<i>Weaknesses</i>	DDOE did not discuss availability of and access to federal and local funding to identified schools in its answer.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>DDOE should provide definition of significant number of schools that will be reviewed.</p> <p>DDOE should identify the criteria in advance as opposed to on a case-by-case basis.</p>

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

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

	<i>Peer Response</i>
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<i>Peer Analysis</i>	<p>DDOE lists technical assistance it will provide to LEAs including on-site technical assistance, off-site technical assistance; off-site networking sessions; embedded professional development learning; virtual learning experiences; guidance documents; and templates to support needs assessment, improvement planning and monitoring.</p> <p>DDOE will “collaborate with LEAs and regional assistance centers to develop a resource hub with regionally implemented, evidenced-based strategies.” DDOE will also “assist LEAs in exploring and identifying appropriate resources in national clearinghouses.” DDOE stakeholder input also noted that DDOE could provide technical assistance to districts on more peripheral issues such as addressing social and emotional skills, developing a positive school climate, ensuring smaller class sizes and providing access to wraparound services.</p>
<i>Strengths</i>	DDOE collaborated with LEAs and regional assistance centers to develop a resource hub with regionally implemented, evidence-based strategies.
<i>Weaknesses</i>	<p>DDOE did not provide information on how proposed strategies will directly affect improved student outcome, increased teacher competency and capacity as well as school and district leader competency and capacity for schools that experience consistent student performance in the bottom 5% of performance metrics.</p> <p>DDOE did not acknowledge subgroup-specific resource allocation and technical assistance based on root cause analysis to close the achievement and opportunity gaps that are aligned with the state’s long term goals and targets.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer(s)) <input checked="" type="checkbox"/> No (3 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>DDOE should provide more detail on rationale for providing improved student outcome.</p> <p>DDOE should provide technical assistance based on needs assessment.</p> <p>DDOE should provide needs assessment based on subgroup specific needs.</p> <p>DDOE should provide explicit link between technical assistance and improved student outcome.</p>

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 (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<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?<sup>4</sup>

	<i>Peer Response</i>
<i>Peer Analysis</i>	DDOE included its educator equity plan in its ESSA state plan and describes the extent that low-income and minority students are served at disproportionate rates by ineffective, inexperienced and out-of-field teachers. The plan contains the strategy to address the disproportionate rates of access to out-of field, and inexperienced teachers

<sup>4</sup> 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.

	for low-income and minority students.  Links are provided to data regarding equity gaps. Extensive information is provided on plans for reporting on effective educator indicators. Additional information is provided in the Title IIA Section
<i>Strengths</i>	The DDOE has a comprehensive educator equity plan outlining specific DDOE activities, recommended actions and supports for LEAs to ensure that ineffective, out-of-field, and inexperienced teachers are not disproportionately assigned to students from low-income families or students of color, or that these students are not exposed to significantly higher rates of teacher turnover. DDOE appears to be setting long-term goals as well as interim goals to resolve this gap and has provided extensive information on how strategies will be employed to reduce this gap.
<i>Weaknesses</i>	None
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

#### **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>	DDOE’s vision is “every learner ready for success in college, career, and life.” DDOE presents a number of collaborations and collaboratives that focus on student well-being, including bullying prevention, trauma-informed practices, and anti-bullying. DDOE describes an exhaustive list of technical assistance, educational resources and training and professional learning opportunities to LEAs, teaching professionals, and school personnel to address issues related to bullying and harassment, the overuse of discipline practices that remove students from the classroom and the use of aversive behavioral interventions that compromise student health and safety.

<i>Strengths</i>	DDOE presents a plan that utilizes a variety of funding sources to develop technical assistance, resources, and training/professional learning modules that promote safe, healthy, and affirming school environment. DDOE utilizes extensive external and internal partnerships with public and private sectors to promote safe and healthy learning environment to maximize the student outcomes.
<i>Weaknesses</i>	It is not always clear which of the 4 cited areas an initiative is intended to address.  DDOE does not present evidence of cultural differences and competencies particularly for high poverty and language minority students.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

### **A.7: School Transitions (ESEA 111(g)(1)(D))**

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	DDOE presents a plan to support students through transitions, at each key grade band transition point. The plan contains detail on all identified subgroups and at risk youth. DDOE presents a range of supports including direct technical assistance to LEAs, providing various federal, state and private funding for many programs that are available to students, providing training and professional development to educators, supporting conferences and providing speakers with expertise in transitions. DDOE not only is supporting transitions for middle and high school but is also developing a significant Early Childhood support system for children from birth to third grade. In addition, DDOE is directly addressing the issue of low student persistence past the second year of college and college remediation rates.
<i>Strengths</i>	DDOE presents a wide ranging and diverse strategy for aiding school transition for PK-12 and for supporting increases in college persistence as well as reducing college remediation rates thru very specific strategies.
<i>Weaknesses</i>	The mechanism for implementing these proposed strategies and timelines for implementation are not provided.

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

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

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

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	<p>DDOE provides a detailed entrance and exit procedure accompanied by valid and reliable assessment tools used for entrance and exit for EL programs. DDOE also describes assessment tools used for students with disabilities especially with the most significant cognitive disabilities.</p> <p>The protocol has been designed for PK-12 and the protocol is implemented in the first 25 days of the student’s enrollment.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The state plan indicated that a statewide focus group of special education coordinators and EL specialists are currently exploring entrance criteria for ELs with severe cognitive disabilities who are unable to participate meaningfully in the ELP identification assessments with accommodations. DDOE did not provide evidence this provision has been vetted with the USED OCR office and DOJ OCR division (legal issue).</p> <p>DDOE did not provide any rationale on the evidence that a dually identified EL (with significant cognitive disabilities) can be eligible for exit with an Alternate ACCESS proficiency level of A3 Emerging or higher. DDOE</p>

	did not provide an explanation and/or clarity on how the Alternate ACCESS proficiency will be calculated since not all four language domains will be assessed.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer(s)) <input checked="" type="checkbox"/> No (3 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE's proposed approach is currently not in compliance with federal law; DDOE should consult with USED Office of Civil Rights, and United States Department Of Justice and USED liaison to determine appropriateness of proposed approach (i.e., alternate exit criteria for ELs with significant cognitive disabilities). DDOE needs to explicitly confirm that statewide identification and exit criteria apply to students in public charter schools.

## 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>	DDOE has developed the English Learner Strategic Plan Guiding Coalition to develop an EL Strategic Plan. According to DDOE, this plan will lead to the development of a systematic support structure in supporting all eligible entities in meeting the state's LTG and MIP as well as challenging academic standards. DDOE provides no details of this developing plan.
<i>Strengths</i>	
<i>Weaknesses</i>	DDOE did not provide any specific information on how DDOE will assist its Title III sub-grantees in meeting the long-term goal for English Language Proficiency, including measurements of interim progress towards meeting such goals. DDOE is still in the development phase of their plan.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should provide an expanded explanation of the plan, which includes roles and responsibilities for participating parties and process/procedure and timeline.

### 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>	DDOE describes a monitoring protocol using multiphase and components for monitoring that will occur at a minimum of once every 5 years. If monitoring efforts indicate a need for additional support and assistance, DDOE will increase monitoring activity and from the multisource evaluation protocol will determine targeted methods of support for each eligible LEA in compliance with requirements of Title III, Part A. The multisource evaluation protocol includes results of program analyses, financial risk assessment, single-state audit determinations, performance measured by the statewide accountability system and captured by report cards as well as educator equity data.
<i>Strengths</i>	
<i>Weaknesses</i>	DDOE did not provide detailed descriptions of how it will further assist LEAs should previous support not be effective, except that they will support the LEA as it conducts a needs assessment and will then provide technical assistance for setting long-term and short-term goals.  DDOE did not provide evidence of support for Title III, Part A sub-grantees that do not meet goals and it is not well delineated.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer(s)) <input checked="" type="checkbox"/> No (3 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	DDOE should describe further steps and strategies to support eligible entities. DDOE should provide update to state plan reflecting on ESSA requirement of 4 years (instead of 2 years). DDOE should provide detailed descriptions of how it will further assist LEAs should previous support prove to not be effective.