

STATE PLAN  
PEER REVIEW CRITERIA  
Peer Review Panel Notes Template

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STATE: Florida



**U.S. Department of Education**

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

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

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

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

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

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

- If applicable,<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>	<p>FL plans to extend this assessment exception to grades preceding 8<sup>th</sup> grade and content areas in addition to math.</p> <p>FL aims to take advantage of the 8<sup>th</sup> grade math exception, and based on its response, appears to meet the associated ESSA requirements. FL statute requires that each middle school offer at least one high school level mathematics course for which students may earn high school credit, and requires administration of statewide, standardized end of course assessments for such courses. Further, state statute prohibits double-testing of students on an end of course assessment and grade-level statewide assessment in the same content area.</p> <p>Finally, the state runs a program (ACCEL) that provides opportunities for students to access a more challenging curriculum or early promotion, and</p>

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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).

	virtual and enriched instruction. Each of these options are offered in a number of courses, including mathematics (p.7).
<i>Strengths</i>	<p>State law provides three pathways for which this exception is applicable: 1.) all schools with middle grades must offer at least one high school level mathematics course for which student may earn high school credit; 2.) middle grade courses include standards from higher grade levels, IB middle years, Cambridge Secondary, and pre-algebra courses; and 3.) FL’s Academically Challenging Curriculum to Enhance Learning requires academically challenging curriculum or accelerated instruction (p.7). State law prohibits double testing on the grade level and EOC assessments (p. 7)</p> <p>FL has adopted an intentional approach to encouraging middle school students to take advanced mathematics courses. Pages 6-8.</p>
<i>Weaknesses</i>	<p>The data provided do not confirm that the strategies are likely to provide <u>all</u> subgroups of students in the State the opportunity to be prepared for and take advanced mathematics coursework in middle school. Data analysis and reporting on pass rates of middle school students taking high school EOC assessments by subgroup (gender, race/ethnicity, socioeconomic background, etc.) may provide a clearer understanding of opportunity to learn so as to ensure no subgroup of students is disproportionately represented. Additionally, the state’s plan should make clear any policies that preclude students from participating in the 8<sup>th</sup> grade math exception.</p> <p>FL’s plan does not clearly indicate how it ensures that middle school students taking advanced math courses and assessments will be assessed in relation to more advanced coursework when in high school.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) <input type="checkbox"/> No
<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>	<p>FL’s plan indicates that Florida law “does not provide for the delivery of governmental services in languages other than English” (p. 8); however, the state’s plan does not indicate statute that prohibits the definition of or provision of services in languages other than English that are present to a significant extent in the participating student population.</p> <p>Although Spanish-speaking students make up approximately 7% of students statewide taking English language arts assessments, FL has adopted an English-only approach to its statewide assessments and demonstrates no interest in creating statewide assessments in languages other than English, stating “there are no assessments needed in languages other than English” (p. 9). FL did not provide a definition of languages other than English that are present to a significant extent. Pages 8-9.</p> <p>FL makes no mention of the various groups of non-English speakers that it considered, the LEAs in which these languages might be concentrated, the migrant or immigrant status of these speakers nor the grade levels in which these students are most prevalent.</p> <p>FL states that its state constitution lists the official language as English and that, in addition to its belief that bilingual assessments would be invalid due to the students not having been taught content in their native language supports its position that content assessments will not be translated in this state.</p>
<i>Strengths</i>	FL’s plan identifies the various languages other than English spoken by its students who are classified as English learners.
<i>Weaknesses</i>	<p>Data provided to report the 240 languages spoken by Florida’s students is representative of only those classified as English learners in an English-language tested grade as opposed to all students in the participating population.</p> <p>FL did not provide a definition of languages other than English that are present to a significant extent.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>FL must provide its definition of “languages other than English that are present to a significant extent in the participating student population”.</p> <p>FL must identify the specific languages that meet that definition.</p> <p>FL’s definition must include at least the most populous language other than English spoken by the State’s participating student population.</p> <p>In determining which languages are present to a significant extent in the</p>

	<p>participating student population, the SEA must 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.</p> <p>In determining which languages are present to a significant extent in the participating student population, FL must 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.</p> <p>FL must provide more information concerning the analyses it performed on the various sub-populations and geographic concentrations of its non-English speaking group of test takers. It is not clear that any data concerning this group was reviewed at anything more than a cursory level.</p>
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**A.3.ii: Existing Assessments in Languages other than English**

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	While FL accurately identifies the number of existing assessments that it makes available in languages other than English as zero, the plan may be strengthened by descriptive information detailing the state’s consideration for and decision not to provide such assessments for any of the 240 languages spoken by ELs in the state in the federally mandated testing content areas of English language arts, mathematics, and science.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	Despite FL’s claims to the contrary, it is likely that certain EL students in the state would be able to demonstrate content knowledge on native language mathematics, science, and other content area assessments that they are not able to demonstrate when administered an assessment in English.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) <input type="checkbox"/> No
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.3.iii: Assessments not Available and Needed

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>FL’s plan provides justification for its exclusion of assessments provided in languages other than English. The justification, however, does not clearly articulate the gain of this exclusion to those students who may benefit most from the provision.</p> <p>Again, FL indicates that although no translated assessments are available, they are also not welcome or needed, despite 6.8% of its tested population consisting of Spanish-speaking English learners. As additional support, the SEA adds that students who have met English proficiency perform as well as native English speakers on the ELA assessment.</p> <p>The plan references comparable achievement on the ELA assessment by EL students compared with non-EL students. This may be interpreted as a strength for the ESOL program or a weakness for the performance of native English speakers.</p>
<i>Strengths</i>	The state plan references English for Speakers of Other Languages; however, the plan does not identify, describe, or provide evidentiary support for the implementation and impact of the program in Florida’s schools (p. 9)
<i>Weaknesses</i>	<p>The statement, “a large portion of Florida’s ELs enter the public school system in kindergarten” (p. 9) is unclear and does not specify the constitution of “a large portion” in relation to its overall student population, as well as its EL population.</p> <p>The statement “...Florida...has found that it can best serve its population of non-native English language students through a comprehensive program of teaching, assessing, and where necessary, providing additional assistance to such students in an English-language environment” (p. 9) is unclear. The state’s plan should expound upon its proclamation of success with non-native English learners in the absence of native language assessments for English language arts, mathematics, and science assessments. Statements of performance comparability between student populations should be accompanied by descriptive data (p. 9).</p> <p>In consideration of the fact that 6.8% of the population taking the ELA assessment is EL, they comprise 22% of the “lowest performing 25%” of ELA students. In math, 19% of the lowest performing 25% of math students are EL. It is noted that, of all the subgroups, only the students with disabilities have a higher ratio of low-performing students to population size. As such, the state should consider the value of translating these assessments in order to allow its EL subgroup greater access to content test items.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the</i>	FL must indicate the language other than English that is present to a

<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	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. Subsequent to developing that definition, FL must identify the languages for which yearly student academic assessments are not available and are needed.
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### 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>	FL indicates no need for translated assessments because it considers them invalid and unreliable as well as a hindrance to the transitioning of an EL to full English proficiency.
<i>Strengths</i>	FL references validity and reliability of the assessment instrument to justify its position.
<i>Weaknesses</i>	FL’s plan strongly claims successful practice with current practice (i.e. “Florida does not need such assessments because they would not be a valid and reliable and use of such assessments, based upon practice and experience, would slow the transition of ELs to English language proficiency.” These claims should be accompanied by definitive evidence.  FL provided no information about how or whether it gathered meaningful input or public comment from stakeholders, educators, families of ELs and students related to this element.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL’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 must include a description of the process the State used to: <ol style="list-style-type: none"> <li>1. gather meaningful input on the need for assessments in languages other than English;</li> <li>2. collect and respond to public comment; and</li> </ol>

	<p>3. consult with educators, parents and families of English learners, students, as appropriate, and other stakeholders?</p> <p>If applicable, FL’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 must 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.</p>
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**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>	<p>FL provides a reporting portal (EDstats) for stakeholder access to prepared and customized reports.</p> <p>FL states that it includes economically disadvantaged students, students with disabilities, English learners, and students from major racial and ethnic groups “for reporting purposes”. It does not appear that FL intends to use the results of students in these subgroups for its annual meaningful differentiation of schools or identification of targeted support and improvement schools. Pages 9-10.</p> <p>FL lists White, Black (also listed as African-American – p.10), Hispanic, Native Hawaiian or other Pacific Islander, American Indian or Alaska native and ‘two or more races’ (p.9) (also listed as Multiracial, p.62).</p>
<i>Strengths</i>	<p>FL’s plan includes a multi-racial ethnicity category as a selection option for racial/ethnic group.</p> <p>FL plans to report subgroup level results.</p> <p>Inclusion of an additional subgroup adds potential for new data analyses and accountability; however, this subgroup was unfortunately not included in the data analyses on p.10 that shows its performance in relation to its population size.</p>
<i>Weaknesses</i>	<p>FL’s plan does not include a reporting category by gender.</p> <p>It does not appear that FL intends to use the results of students in these subgroups for its annual meaningful differentiation of schools or identification of targeted support and improvement schools.</p> <p>There is a lack of continuity in the terminology used for the various subgroups. FL does not list, in the narrative on p.9, the Asian subgroup as</p>

	being in its accountability system, though it appears to include the subgroup in Appendix A (p.62). Appendix A lists an “Other Students” group for gap-reduction calculations, however, whereas that group is not indicated as an accountability subgroup in this narrative. (Other Students includes American Indian and Pacific Islander, which are independent subgroups and should not be aggregated).
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL must clarify its list of included subgroups in its accountability system so that information in various sections of the plan is consistent.

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>	FL’s plan describes an additional subgroup of the 25% lowest performing students in ELA and math for the school and district calculations. This group is identified across all other subgroup categories and allows for analysis by subgroup of variation in overall percentages of lowest 25% and remaining 75%.
<i>Strengths</i>	<p>The creation of this subgroup demonstrates FL’s commitment to supporting schools and districts in closing achievement gaps across subgroups, even in those cases where subgroup sizes are too small to render an accountability determination.</p> <p>By definition, every school has a lowest performing 25% of students, thus results for this subgroup can be calculated for all but the smallest schools. Further, relying on a super subgroup in this way eliminates the NCLB-era concern of counting and holding a school accountable for the results of a single student in multiple subgroups.</p>
<i>Weaknesses</i>	<p>The data reported on page 11 is not accompanied by total enrollment percentages. Understanding enrollment percentages will better aid observers in discerning impact of this subgroup.</p> <p>The approach raises questions about transparency of information: who are the lowest performing 25% of students in a school, what processes—reporting and otherwise—are in place at the local level to help educators identify which students are identified in this group and need the most support. Analysis of variance calculations may provide a more statistically sound approach to capturing and identifying this group’s representation among other groups.</p> <p>The narrative is unclear as to whether the lowest performing 25% are</p>

	calculated based on low growth or low achievement. (However, later on p.64 the qualifier of “learning gains” appears to indicate that this is the lowest 25% of growth, as listed under Academic Progress).
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) <input type="checkbox"/> No
<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>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

- Does the SEA provide the minimum number of students that the State determines is necessary to meet the requirements of any provisions under Title I, Part A of the ESEA that require disaggregation of information by each subgroup of students for accountability purposes, including annual meaningful differentiation and identification of schools?

- Is the minimum number of students the same State-determined number for all students and for each subgroup of students in the State (*i.e.*, economically disadvantaged students, students from each major racial and ethnic group, children with disabilities, and English learners) for accountability purposes?

	<i>Peer Response</i>
<i>Peer Analysis</i>	FL has established through state statute a minimum cell size of 10 for all students and each subgroup for accountability and reporting purposes. Page 12.
<i>Strengths</i>	One reviewer agrees that the minimum N-size of 10 is reasonable and sound, and allows for accuracy and transparency in data interpretation for implication to policy and practice.  A minimum n-size of 10 allows that state to report aggregated results for almost every school in the state.
<i>Weaknesses</i>	One reviewer cautions that the n-size of 10 for accountability purposes is very small, and will cause variability in year-to-year results that would not occur with a larger n-size. Thus, the state’s annual meaningful differentiations and identification of comprehensive and targeted support schools are, in certain cases, likely to be influenced by the results of very small numbers of students and as a result some findings may not represent meaningful change from prior years.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) <input type="checkbox"/> No
<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>

	<i>Peer Response</i>
<i>Peer Analysis</i>	FL states that its minimum n-size of 10 is large enough to ensure statistically sound reporting of information, and emphasizes the importance of holding

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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 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.

	schools accountable for student performance. FL does not provide information about statistical analyses performed to demonstrate validity or reliability of its n-size, nor does it indicate any approaches it plans to implement to mitigate the potential variability of year-to-year results. Page 12.
<i>Strengths</i>	<p>FL’s plan includes a clear description of the empirically researched statistical soundness of the minimum N-count and is easily comprehensible to the education professionals, as well as those outside the profession.</p> <p>A minimum n-size of 10 allows that state to report aggregated results for almost every school in the state.</p>
<i>Weaknesses</i>	<p>FL justifies its selection of an n-size of 10 by describing its ability to hold most schools in the state accountable by using 10 students. The state does not describe any analyses that it performed to determine that a group size of 10 will typically produce valid and reliable results, nor does the state describe any approaches it plans to implement (e.g., multi-year averaging, confidence intervals) to help mitigate variable year-to-year results.</p> <p>More information is provided about why the N size was not set at something other than 10, as opposed to substantiating why it was set at 10.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1) <input checked="" type="checkbox"/> No (2)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Describe analyses that the state performed to determine that a group size of 10 will produce valid and reliable results, and/or describe any approaches the state plans to implement (e.g., multi-year averaging, confidence intervals) to help mitigate variability of year-to-year results.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	FL states that the N size of 10 is both a state law as well as a state board of education rule. The legislation included “substantial input at committee meetings from the public and from school district representatives,” (p.12) and the board rule was adopted following three public workshops that were attended by education stakeholders “who had the opportunity to provide comments on the draft rule language.”
<i>Strengths</i>	<p>FL’s board-adopted rule language was discussed at three public meetings attended by various education stakeholders.</p> <p>It appears that the public and other stakeholders had an opportunity to provide feedback on the state’s minimum n-size.</p>
<i>Weaknesses</i>	<p>FL’s plan lacks definitive evidence supporting the notion that the minimum N-size is the best-selected size for the state’s 10-year projected plan.</p> <p>FL’s description of the solicitation of public input was not in depth, and, with</p>

	no discussion of data reviewed on various N size options, the appearance is that the number was selected internally, and that the statute and board rule were drafted prior to the public and stakeholders being given a chance to provide input.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) <input type="checkbox"/> No
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	FL uses the same minimum n-size of 10 for both reporting and accountability purposes, and has codified its reporting rules in written policy. Pages 12-13.  FL does not provide details regarding how its selection of 10 as the minimum N would ensure student privacy. Instead it generally indicates that it will not release information or reports of either individual students or subgroups with fewer than the minimum N of 10 and that it adheres to FERPA requirements. (p.12-13)
<i>Strengths</i>	FL’s plan complies with FERPA rules on data suppression for small groups of students when associated with characteristics that would make it possible to identify a student and appropriately cites FERPA as the guiding rule for its state’s procedures to protect the privacy of individual students.
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) <input type="checkbox"/> No
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<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>The long-term goal is designed to both increase proficiency and close achievement gaps. The state’s plan picks up in year 3 of its Strategic Plan. The plan allows for a review of and possible revision to its goals in year 5, for a long-term goal outcome year of 2024-2025. The state’s decision to incorporate its existing goals into those required of ESSA should fully account for the flexibilities and provisions allowable under ESSA.</p> <p>FL has established long-term goals for all students and student subgroups for the period between 2014-15 and 2019-20, and indicates that it will update its Board of Education-adopted strategic plan in 2019-20 for the next five-year period, through 2024-25. The current academic achievement goals aim for an</p>

	<p>increase in the percentage of all students scoring at grade level (proficient) or higher of 6 points over the 5 years in both ELA and math. The state’s goals for subgroups are based on a one-third reduction in the achievement gap over the same 5 years. Gaps appear to be measured by the difference between percentage of white students scoring proficient and higher and percentage scoring proficient or higher for other racial/ethnic groups. A similar approach is used for non-racial/ethnic groups, e.g., gap between students with disabilities and students without disabilities. Pages 13, 61-62 (Appendix A).</p>
<i>Strengths</i>	<p>FL’s plan builds upon gains made from 2011-2014 and references longitudinal data analysis in setting the long-term goals under ESSA.</p> <p>FL aims to align its ESSA plan with its previously adopted state strategic plan, and proposes using the same goals and targets for academic achievement it had previously adopted.</p>
<i>Weaknesses</i>	<p>For some subgroups, the goals are sufficiently ambitious up to the midway point of its 10-year plan (2019-2020); however, it is unclear if the remaining 5 years of the plan will include targets that are sufficiently ambitious. The data provided as projections for the target year of 2019-2020 is helpful; however, the state’s plan would be strengthened by including projections through 2024-2025, noting that the actual targets are subject to change pending a review in 2019-2020.</p> <p>The targets listed in the Asian-to-White gap rows (p. 61) require students in the Asian subgroup to regress in their academic achievement in order to achieve at the level of the White subgroup. Therefore, this proposed system will not result in the improvement of academic achievement for all students and each subgroup of students (in this case, for the Asian student subgroup).</p> <p>According to the state, the American Indian and Pacific Islander subgroups are combined when compared to the White subgroup for gap reduction purposes.</p> <p>Considering that the gap-reduction plan is based on all racial/ethnic subgroups seeking to reduce the gap between themselves and the White subgroup, it is conceivable that a performance decrease (or performance remaining at its current level) in the White subgroup would contribute to a successful gap-reduction despite no academic progress having been achieved.</p> <p>Also, the goal is stated as “Reduce by one-third the gap between each subgroup in each subject area” (p.61); however, the chart on Appendix A does not provide goals for gap reduction “between each subgroup” but rather between the various ethnic subgroups and the White group. SWD v. non-SWD, EL v. non-EL and ED v. non-ED gaps (as reported) are wide; however, the “non-“SWD/EL/ED groups are not annually reported in the SEA’s accountability system. This adds a layer of opacity to this calculation since scores cannot be extrapolated for these SEA-devised groups and the public, the schools and the LEAs would be asked to take the SEA at its word regarding these calculations.</p> <p>Furthermore, gap reduction does not necessarily require progress in order to be successful, but could end up rewarding lack of progress made by the higher achieving groups. This does not support the concept of the goal being</p>

	“ambitious”.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL must provide FSAT baseline proficiency rates for each federally-required subgroup in order to provide context for the gap-closure system. In addition, the state must ensure that the long-term goal for each of its subgroups, particularly Asian and Multiracial, is ambitious in its ‘achievement gap reduction’ proposal. (See chart on p.61).  The state must disaggregate the American Indian and the Pacific Islander subgroup goals from the “Other Students” subgroup in its accountability system.

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>	FL has established long-term goals for all students and for the majority of subgroups for the period between 2014-15 and 2019-20, and has set interim targets for the intervening years. Pages 14, 61-62.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	The plan includes measurements of interim progress for most, but not all, required subgroups and it projects those goals through year 5 of its 10-year plan. The state’s plan lacks measurements of interim progress toward meeting the long-term goals for each subgroup of students for years 6-10 of its long-term plan.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL’s plan must provide measurements of interim progress toward meeting the long-term goals for years 6-10 of its long-term plan.  FL must ensure that all of its federally-required accountability and reporting subgroups are included as individual subgroups for the purposes of its measurements of interim progress.

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>	As described in A.4.iii.a.1 above, FL has established a goal of reducing achievement gaps between subgroups by one-third by 2019-20. FL indicates that it will use a gap analysis to help determine which districts need additional

	support from the state to improve student subgroup performance. Page 14, 61-62.
<i>Strengths</i>	FL’s plan describes in great detail its multi-tiered system of support that incorporates a comprehensive, data-driven approach to support academic progress for all students across all content areas. The plan cites a positive outcome from a specific anecdote of focusing on the EL student performance in middle grades science.
<i>Weaknesses</i>	While FL’s plan is comprehensive and inclusive of diversity, it lacks a clear and specific description of how the state will support LEA’s in achieving their long-term goals for academic achievement. .  Though Appendix A displays the improvement necessary for gap reduction, the narrative (p.14) does not address the indicator but rather provides information on the supports that will be made available to struggling subgroups.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL’s gap reduction plan must ensure that those subgroups who are behind in reaching the goals are expected to make significant progress toward closing achievement gaps, and that gap reduction may not be achieved due to the higher performing subgroups’ scores declining.  FL must also ensure that all of its federally-required accountability and reporting subgroups are included as individual subgroups for the purposes of its measurements of interim progress.

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>	FL aims to increase its graduation rate for all students by 7.1 percentage points between the period of 2014-15 and 2019-20, and to reduce the graduation rate gap between subgroups by one-third during the same period. This proposal is a graduation-gap reduction goal – not an absolute, increasing goal for graduation rate by subgroup. As with the academic achievement targets, the state expects to update its strategic plan in 2019-20 for the subsequent five-year period and adjust its goals and targets accordingly at that time. At the state level, increasing the graduation rate by 7 percentage points and reducing graduation rate gaps among some subgroups is ambitious. Pages 15, 61-62.
<i>Strengths</i>	FL’s plan considers past gains in its plan for progress. FL indicates its goal to

	reach 85 percent graduation rate by 2019-2020.  FL aims to align its ESSA plan with its previously adopted state strategic plan, and proposes using the same goals and targets for graduation rate it had previously adopted.
<i>Weaknesses</i>	FL’s plan does not indicate any proposed growth in the graduation rate beyond 85 percent through its long-term goal plan of 2024-2025. If the state’s goal is to retain 85 percent as the graduation rate through 2025, there is a question on the ambitiousness of the goals. The plan cites the law of diminishing returns in its claim for the ambitiousness of the goals.  FL aggregates the American Indian and Pacific Islander for its graduation rate gap reduction calculations, though these groups’ graduation rates should be reported individually.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL must ensure that each of its subgroup goals, including Asian and Multiracial, is ambitious and that it clearly defines the comparison groups in its ‘graduation rate gap reduction’ proposal. The state must disaggregate the American Indian and the Pacific Islander subgroup goals from the “Other Students” subgroup in its accountability system and must provide more details to affirm that its long term goals are ambitious. The state must include proposed growth in the graduation rate through the long-term goal plan of 2024-2025.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses</i>	N/A
<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</i>	

<i>or clarification that an SEA must provide to fully meet this requirement</i>	
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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>	<p>See A.4.iii.b.1 above. FL has established long-term graduation rate goals for all students and for certain subgroups for the period between 2014-15 and 2019-20, and has set interim targets for the intervening years. Pages 16, 61-62.</p> <p>FL does provide interim progress goals for its All Students group (annual increases in its graduation rate) and various subgroups (annual decreases in the rate gap between White and the other ethnic groups and ED/EL/SWD v non-ED/EL/SWD).</p> <p>The “Other Students” group includes 2 subgroups: American Indian and Pacific Islander, however. As such, their individual group rates or interim progress goals are not provided.</p>
<i>Strengths</i>	FL’s plan indicates its goal to reach 85 percent graduation rate by 2019-2020.
<i>Weaknesses</i>	<p>FL’s plan does not indicate any proposed growth in the graduation rate beyond 85 percent through its long-term goal plan of 2024-2025. If the state’s goal is to retain 85 percent as the graduation rate through 2025, there is a question on the ambitiousness of the goals. The plan cites the law of diminishing returns in its claim for the ambitiousness of the goals.</p> <p>In addition, FL should consider that ‘reducing the gap’ between subgroups’ graduation rates does not necessarily require a lower-performing subgroup to improve – but could be a factor of the higher-achieving group graduating a lower percentage of students.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>FL’s plan must indicate proposed growth in the graduation rate through its long-term goal plan of 2024-2025.</p> <p>FL must include progress goals for the American Indian and Pacific Islander groups individually.</p> <p>FL’s gap reduction plan must ensure that those subgroups who are behind in reaching the graduation rate goals are expected to make significant progress toward closing the gap, and that gap reduction may not be achieved due to the</p>

higher performing subgroups' graduation rate declining.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>FL's plan cites impressive historical closing of gaps between some groups over the past decade.</p> <p>As described in A.4.iii.b.1 above, FL has established a goal of reducing graduation gaps between subgroups by one-third by 2019-20. Page 16, 61-62.</p> <p>FL did not provide information about how it plans to close gaps in statewide graduation rates in the narrative; however, information that supports the greater incremental goals for lower-performing groups can be found in Appendix A.</p>
<i>Strengths</i>	FL's plan indicates it intends to increase the graduation rate by 7.1 percentage points over the first 5 years of its long-term plan.
<i>Weaknesses</i>	<p>FL's plan does not indicate any goals to reduce the graduation gap through its long-term goal plan of 2024-2025. If the state's goal is to require no additional closing of the gap through 2025, there is a question on the ambitiousness of the goals.</p> <p>The proposal would stand up to deeper scrutiny if the SEA's rationale for its goals and its methodology in setting them were provided in the narrative, rather than anticipating that the progress goal chart would speak for itself.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2) <input checked="" type="checkbox"/> No (1)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>FL's plan must indicate its proposal to reduce the graduation rate gap through its long-term goal plan of 2024-2025.</p> <p>FL's gap reduction plan must ensure that those subgroups who are behind in reaching the goals are expected to make significant progress toward closing graduation rate gaps, and that gap reduction may not be achieved due to the higher performing subgroups' graduation rates declining.</p> <p>FL must also ensure that all of its federally-required accountability and reporting subgroups are included as individual subgroups for the purposes of its measurements of interim progress.</p>

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>FL’s plan indicates its goal to raise proficiency by 6 percentage points by 2019-2020. The plan cites its current lack of data due to the adoption of a new measurement instrument, and the potential need to revise its goal for the last 5 years of the state’s 10-year long-term plan. The state’s plan identifies nuances in the categorization of its population of EL students—those who enter kindergarten classified as EL and those entering FL schools later in life classified as EL students and students services are based upon need after one and three years of failing to achieve proficiency. FL students failing to achieve proficiency after three years are evaluated by an ELL committee annually thereafter, with the goal for all students to achieve proficiency within five or fewer years. (p.17)</p> <p>FL has set a goal of increasing the percentage of ELs making progress toward achieving English proficiency from 60 percent in 2016-17 to 66 percent by 2019-20; however, the state indicates it may amend that goal after analyzing additional results from the new ACCESS 2.0 assessment. FL indicates that its goal is for ELs to exit EL status within five or fewer years, and describes processes in place to carefully assess the progress of students who have been in an EL program for three years and not yet exited. Pages 16-17, 62.</p> <p>For the Alternate ACCESS assessment, progress is considered moving up at least one level, or remaining at the P1 (4<sup>th</sup> out of 5) level.</p> <p>It is not possible to fully evaluate whether the progress goals are ambitious, as the state did not provide data indicating the number of ELs at the various composite proficiency levels nor did it provide any historical data analyzed to reveal the average progress of ELs over time.</p>
<i>Strengths</i>	<p>The graduated system of support allows for customizing services according to the needs of the student.</p> <p>FL’s plan emphasizes the individual nature of EL progress toward English proficiency, while establishing an overarching expectation that students will transition out of EL programs within five years.</p>
<i>Weaknesses</i>	<p>FL’s plan does not indicate an increase in ELs making progress in English language proficiency beyond 2019-20 through its long-term goal plan of 2024-2025.</p>

	The lack of student data hinders analysis of the viability or the ambitiousness of this proposal.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2) <input checked="" type="checkbox"/> No (1)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL must provide its proposed growth in the EL progress toward proficiency rate through its long-term goal plan of 2024-2025 to ensure that the goals continue to be ambitious.

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>	FL’s current measure of interim progress is an increase of 2 percentage points per year in the number of EL students making progress toward English proficiency as measured by the ACCESS assessment. The state indicates that it may modify its goal and targets after analyzing additional years of ACCESS results. Pages 16-17.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	FL’s plan does not indicate an increase in ELs making progress in English language proficiency beyond 2019-20 through its long-term goal plan of 2024-2025. If the state’s goal is to retain 66 percent as the goal through 2025, there is a question on the ambitiousness of the goals.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2) <input checked="" type="checkbox"/> No (1)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL must provide its EL progress toward proficiency goals through the long-term goal plan of 2024-2025.

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>FL’s plan indicates its procedure for calculating and reporting school and district grades based on achievement (for all elementary and secondary schools that are not high schools) and learning gains (for high schools).</p> <p>FL uses the percentage of students “passing” (Level 3 or higher) in ELA and mathematics as its academic achievement indicator for all schools. For high schools, the state also includes year-to-year student improvement on the ELA and mathematics assessments. The state uses the results for all students to calculate school grades, weighting each indicator (ELA, math, HS ELA improvement, HS math improvement) equally. The state plans to calculate results for subgroups, but it only plans to use the results for the lowest performing 25% of students in its school grade assignment. It does not appear that results for other subgroups directly impact the assignment of school grades. Other details regarding the calculations are unclear (e.g., how credit is assigned for end of course assessments vs general statewide assessments). Pages 17-18.</p> <p>FL indicates that it calculates the Academic Achievement indicator based on the percent of full-year enrolled students passing the ELA and the Mathematics assessments (end-of-year, end-of-course and Alternate). It is calculated the same across all schools. (p.18) It is unclear whether a ‘passing score’ indicates grade level proficiency.</p> <p>At the high school level, student growth is measured using achievement on the “comprehensive assessments”, EOCs and alternate assessments. Students who have a prior year and a current year score will be included in this calculation and the SEA proposes 4 ways in which a student can show progress.</p> <ol style="list-style-type: none"> <li>1. Maintaining a score within Level 1</li> <li>2. Increasing by one or more achievement levels</li> <li>3. Maintaining a passing (Level 3 or 4) level and increasing their score by at least 1 point</li> <li>4. Increasing to a higher “subcategory” for students remaining in Levels 1 or 2.</li> </ol> <p>This high school progress metric will be calculated for “all students” and the “Lowest Performing 25%”. It does not appear that the individual subgroups</p>

	<p>will be included in this calculation.</p> <p>FL states that the calculation of each component is “based on the performance of all full-year enrolled students and is also reported based on the performance of each subgroup in the school report card.” Thus it appears that subgroup performance is simply “reported”.</p>
<i>Strengths</i>	<p>FL’s plan describes the conditions by which students may earn credit for a learning gain. The four conditions are comprehensive and allow students to demonstrate achievement in gains in multiple ways. The learning gains indicator also includes gains calculated for the lowest performing 25% of students, regardless of any other subgroup(s) to which they belong. The state’s plan presents its sample reporting format, which is clear and easy to read.</p>
<i>Weaknesses</i>	<p>As described above in the section regarding minimum n-size, this indicator is likely to yield variable year-to-year results for small populations. Without implementing approaches to mitigate such variability, the reliability of the indicator for small cells is questionable.</p> <p>It is unclear what a “subcategory” is on the various assessments and how that demonstrates that a student has achieved academic progress.</p> <p>FL does not explicitly state the subgroups it will include within the calculations of its Academic Achievement indicator and what constitutes a “passing score” on the statewide assessments. It would also be helpful to indicate that a passing score indicates grade-level proficiency in the assessed subject.</p> <p>The SEA must explicitly state that it requires all students’ participation on the statewide assessments, both for the All Student group as well as for the individual subgroup level.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No (3)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>FL must explicitly state the subgroups it will include within the calculations of its Academic Achievement indicator and confirm that a passing score, as used in its accountability system, equates to grade-level proficiency. In addition, FL must explicitly state that it requires all students’ participation on the statewide assessments, both for the All Student group as well as for the individual subgroup level.</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>FL’s plan describes its calculation of academic progress or learning gains as growth on the FSAA from prior year to current year.</p> <p>FL plans to use academic progress/learning gains/improvement as an additional academic indicator for non-high schools. This indicator will be measured the same way it is measured at the high school level, with equal credit assigned for ELA and math results. Pages 18-19.</p> <p>For elementary and middle schools, progress will act as the Other Academic indicator. Identical to the high school progress measure, progress will be considered if a student’s score meets any of the 4 “progress” criteria:</p> <ol style="list-style-type: none"> <li>1. Maintaining a score within Level 1</li> <li>2. Increasing by one or more achievement levels</li> <li>3. Maintaining a passing (Level 3 or 4) level and increasing their score by at least 1 point</li> <li>4. Increasing to a higher “subcategory” for students remaining in Levels 1 or 2.</li> </ol> <p>Though, again, the SEA indicates that it will report on disaggregated subgroup progress, only the “all students” and “lowest performing 25%” appear to be included in the calculations of this indicator.</p>
<i>Strengths</i>	<p>FL’s plan describes the conditions for which students may earn credit for a learning gain. The four conditions are comprehensive and allow students to demonstrate achievement in gains in multiple ways. The learning gains indicator also includes gains calculated for the lowest performing 25% of students, regardless of any other subgroup(s) to which they belong.</p>
<i>Weaknesses</i>	<p>FL indicates that students scoring in Levels 3 and 4 can potentially gain credit for growth by increasing their score “by at least one point”.</p> <p>It is unclear what a “subcategory” is on the various assessments and how that demonstrates that a student has achieved academic progress.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No (3)</p>
<i>If no, describe the</i>	<p>FL must provide data and analysis to support their assertion that at least one-</p>

<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	point improvement in the Level 3 or Level 4 is a valid determination of growth.
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A.4.iv.c: Graduation Rate

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>FL’s plan is clear and appropriately meets the specified criteria. The plan also indicates that the FL special diploma was repealed in 2015; therefore, students with the most significant cognitive disabilities are included in the graduation rate as graduates only if they receive a FL standard diploma.</p> <p>FL plans to use the four-year graduation rate for this indicator, assigning the same amount of credit (100 points) as each academic indicator it plans to use. Pages 19-20.</p> <p>The graduation rate indicator is based on the SEA’s long term goal of increasing the graduation rate by 7.1 percentage points over the course of 5 years. It is based on the graduation rate, lagged by one year due to the calculations not able to be performed in time to generate useful score reporting for schools.</p> <p>The calculation will be performed only on the All Students category; however, individual subgroup performance will be reported out on school report cards.</p>
<i>Strengths</i>	N/A
<i>Weaknesses</i>	N/A

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

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>FL’s plan describes how the state will calculate progress toward achieving English proficiency and suggests that it will be included in school report cards; however, it appears that FL does not intend to use progress toward achieving English proficiency as an indicator in its annual meaningful differentiation/school grades/comprehensive or targeted support designations. The SEA will, however, report ELs’ progress in language proficiency on school report cards. Proficiency is defined as a Level 4 composite on the ACCESS for ELLs assessment and all students, K-12, are included in the progress reporting. Pages 20-22.</p> <p>The SEA states that its focus is on holding ELs accountable for progress (closing their gap with non-ELs) in the ELA content area.</p>
<i>Strengths</i>	<p>FL’s plan includes an Alternate assessment for EL students with the most significant cognitive disabilities.</p>
<i>Weaknesses</i>	<p>FL’s plan lacks definitive evidence for the validity and reliability of the measurement instrument for its state.</p> <p>On p.16, the business rules for inclusion of students in the calculation are murky. the plan states that K-12 students will be included if they are “enrolled in the ESOL program, have a valid current year and prior year score on the ACCESS test and are full-year enrolled.” There is a concern that students who are migrant may be left out of the equation, because it is unknown whether ‘full-year enrolled’ relates to the testing school or rather in any school in the state. In addition, students whose caregivers refuse standard ESOL program enrollment will also be excluded from accountability.</p>

<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>FL must provide details on how it will incorporate progress toward achieving English proficiency in its annual meaningful differentiation/school grades/comprehensive or targeted support designations.</p> <p>FL must specify that all EL students will be included in its calculations. To clarify, the state must define “full-year enrolled” for the EL students, many of whom are migrant, and what it deems “enrolled in the ESOL program.”</p>

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>FL proposes multiple indicators of school quality or student success, with differentiation at the elementary, middle, and high school levels: science achievement, social studies achievement, middle school acceleration, and high school acceleration. Each is assigned the same credit as individual subject area academic achievement indicator results (100 points each). It appears that credit is only assigned at the All Students level when determining school grades, but that the state will report results by subgroup on school and district report cards. Pages 20-22</p> <p>Data is not provided on the application of these elements to the state’s accountability system, however the SEA states that it results in a “wide range of performance among schools”, supporting its ability to differentiate for school accountability purposes.</p> <p>The Achievement scores are based on the percentage of full-year enrolled students who achieve a ‘passing’ score on the Science and Social Studies statewide assessments (including comprehensive assessments, EOCs and alternate assessments.)</p> <p>The Middle School Acceleration indicator is based on the percentage of “eligible” MS students who pass a HS EOC or receive an industry</p>

	<p>certification. It is unclear whether the denominator only includes the MS students who participate in advanced or industry coursework or rather the group of all MS students who are full-year enrolled.</p> <p>The High School Acceleration indicator measures the percentage of “graduates from the graduation rate cohort” who qualified for college credit or industry certification based on an acceleration exam (IB, AP or AICE) or a qualifying grade in a dual enrollment course. This will be calculated based on All (eligible) Students, but will also be <u>reported</u> by the subgroup level on the school report card.</p>
<i>Strengths</i>	<p>FL’s plan includes a measure of acceleration for middle schools and high schools.</p> <p>FL has attempted to identify indicators available at each grade span beyond ELA/math results and graduation rates.</p>
<i>Weaknesses</i>	<p>It may be unclear or confusing to parents and stakeholders that what is represented in the “school quality” indicator is an academic measure (Science/Social Studies).</p> <p>It is unclear whether the denominator in the Middle School Acceleration element only includes the middle school students who participate in advanced or industry coursework or rather the group of all MS students who are full-year enrolled.</p> <p>By including in the High School Acceleration indicator only “graduates from the graduation rate cohort” who qualified for college credit or industry certification based on an acceleration exam (IB, AP or AICE) or a qualifying grade in a dual enrollment course, the state may not adequately differentiate schools’ quality as only a higher-achieving (i.e. graduates) subset of students will be included in the denominator of this calculation.</p> <p>Rather than as indicators of school quality or student success, science and social studies assessment results would be better characterized as Other Academic indicators. Additionally, by focusing on the results for all students it is possible to overlook discrepancies between subgroups of students.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No (3)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>FL must provide more specificity regarding the students to be included in the calculations of the Middle and High School Acceleration elements in order to ensure that the indicator is valid, reliable, comparable, and used statewide in all schools. FL must provide data that indicates that these indicators would meaningfully differentiate among schools.</p>

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

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

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

- Is the State’s system of annual meaningful differentiation based on all indicators in the State’s accountability system?
- Does the State’s system of annual meaningful differentiation include the performance of all students and each subgroup of students on each of the indicators in the State’s accountability system?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>FL’s primary method of establishing an annual meaningful differentiation for schools is to assign a school grade. The school grade is based on the indicators described above for all students and, for certain indicators, the lowest performing 25% of students. EL progress toward attaining English proficiency is not a factor in the assignment of a school grade. The state also plans to report additional information in annual school report cards, including performance on all indicators for all subgroups. Page 23.</p> <p>FL states that its accountability system is based on a calculation which provides for equal weight of every indicator element (100 points each) and it grades schools based on a simple percentage of points earned out of the total number of points possible (points-possible is based on school-type) (p.23). Schools are then awarded grades on an A – F scale based on their accumulated percentage across all indicator elements.</p> <p>FL’s system is based on all ESSA-required indicators aside from the Progress in ELP indicator and, for schools with an N size too low for an indicator to be calculated, the element will be removed entirely from the school’s “points eligible” amount – resulting in a lower “points possible” than for schools with sufficient N sizes in every element.</p>
<i>Strengths</i>	A school grade is a simple way of conveying school performance to the public.
<i>Weaknesses</i>	<p>FL’s plan lacks a description of the calculated spread (i.e. threshold) between categorical rankings. There is a 38 point spread for A schools (100-62), 7 point spread for B schools (61-54), 12 point spread for C schools (53-41), 8 point spread for D schools (40-32), and 31 point spread for F schools (31-0).</p> <p>School grades can be interpreted in an overly simplistic way, and have been criticized for this reason. The state does not plan to use subgroup results, apart from the lowest performing 25% of students, for its assignment of school grades. Finally, EL progress toward attaining English proficiency does not appear to be a factor in the assignment of a school grade.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>FL must incorporate progress toward achieving English proficiency in its annual meaningful differentiation/school grades/comprehensive or targeted support designations.</p> <p>FL must ensure that each subgroup of students (not simply the “All Students” or, for Progress, the “All Students” and “Lowest Performing 25% of Students”) is included in the State’s accountability system. Reporting subgroup performance is not equivalent to weighting their performance in the indicators.</p>

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>FL proposes a straightforward approach to weighting indicators, assigning the same weight (100 points) to each indicator or element within an indicator (e.g., 100 points for ELA achievement, 100 points for math achievement). It appears that points are based on percentages of students achieving the target, for instance, proficiency in a subject area. FL then totals points across categories and assigns school grades based on certain thresholds (e.g., C=41%-53% of points). This approach allows for easy adjustment when data are insufficient to render results for a particular indicator. Based on the information provided, FL does not plan to incorporate progress toward achieving English proficiency in its annual meaningful differentiation. Pages 22-23.</p> <p>Aside from Graduation Rate, each indicator is composed of a number of elements that carries a weight of 100 points in the system.</p> <p>With no Progress in ELP indicator there is no weighting attached, and thus the weight is insufficient at all school levels. At the individual indicator level, the Academic Achievement weights of 200 at the Elementary and Middle School levels may not be considered “substantial Certainly Graduation Rate – equaling 100 points – is significantly lower in weight than the HS School Quality indicator (300 or 400 pts.) Therefore, Graduation Rate could not be considered as “receiving substantial weight” in the system.</p>
<i>Strengths</i>	<p>By assigning the same weight (100 points) to each indicator—or element within an indicator—the state has created a straightforward, easy-to-understand calculation. Also, in its point assignment, FL demonstrates a focus on progress/improvement, not just status—e.g., for elementary schools status is weighted a maximum of 300 points and progress can be up to 400 points. Page 23.</p>
<i>Weaknesses</i>	<p>With small group sizes (minimum n=10) and no apparent attempts to stabilize results (e.g., multi-year averaging, confidence intervals), both status and (especially) progress results may be overly variable. EL progress toward attaining English proficiency does not appear to be a factor in the assignment of a school grade.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No (3)</p>
<i>If no, describe the specific information or clarification that</i>	<p>FL must incorporate progress toward achieving English proficiency in its annual meaningful differentiation/school grades/comprehensive or targeted support designations.</p>

<i>an SEA must provide to fully meet this requirement</i>	
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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>	<p>FL briefly describes several alternative approaches it uses for schools with limited/no assessment results and/or schools serving special populations. The details provided are scant, preventing a full assessment of the state’s approaches: however, it appears that FL attempts to provide school grades to all schools, including those without tested grades. Page 24.</p> <p>Alternative schools and Exceptional Student Education centers have a choice to receive a school grade or a school improvement rating. The state did not provide details on the calculation procedures for school improvement ratings.</p> <p>FL offers K-3 schools that do not receive a school grade the option of receiving the school grade of the school to which they send the majority of their students.</p> <p>Alternative/Exceptional Student Education schools, must choose between receiving a school grade or receiving a school improvement rating (a rating based solely on progress). If the improvement rating is chosen, the performance of the school’s students is also rolled into the school grade of the home-zoned school which the student would normally have attended. (p.24)</p> <p>No mention is made as to how either of these types of schools would factor into the identification process for comprehensive or targeted support. It is surmised that any school that elects to receive a school grade would be in the pool from which support schools are selected. Alternative/ESE schools that elect a school improvement rating, however, do not have a path toward identification for support since all identification is based solely on the grade a school receives in the accountability system.</p>
<i>Strengths</i>	<p>One reviewer indicates that it appears that FL attempts to provide school grades, or a similar assessment, to all schools, including those without tested grades.</p>
<i>Weaknesses</i>	<p>It is challenging to appropriately assign a grade to an early childhood school (in FL’s case, K-3 schools) based on “majorities” of students who matriculate in other schools.</p> <p>The calculation for a “school improvement rating” is not provided and no</p>

	information is provided on how unique schools are identified for comprehensive or targeted support services.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL must specify how K-3 schools that do not elect to receive the school grade of the school to which a majority of their students matriculate would be included in the identification system for improvement support. In addition, FL must identify how alternative/ESE schools would be identified for improvement support if they have elected to receive a school improvement rating in lieu of a school grade. Additionally, the state must describe the methodology by which it generates a “school improvement rating” for alternative/ESE schools.

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>	FL’s language on page 24 states that “Florida would identify...”; however, the state must confirm that it <u>will</u> identify such schools.  FL plans to use its school grade system to identify schools for comprehensive support and improvement, specifically placing schools with an F or two consecutive D letter grades in comprehensive support status. FL’s plan indicates that it will identify comprehensive support schools annually, beginning in summer 2018-19. FL does not affirm that it will annually identify at least 5 percent of its Title I schools for comprehensive support, but provides data from 2016-17 indicating that the number of schools with an F or two consecutive D letter grades represented 6.5% of the state’s Title I schools. Page 24.
<i>Strengths</i>	FL references the Florida Differentiated Accountability system that has been helpful to schools and districts in turnaround efforts.  FL is attempting to use its preexisting approach to identify schools in a way that meets ESSA requirements.
<i>Weaknesses</i>	FL’s plan lacks clarity that its methodology to identify comprehensive support and improvement schools results 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.

	The alignment between the state’s existing letter grade system and ESSA requirements is imperfect, and the state does not affirm that it will identify at least 5% of its schools for comprehensive support. It is unclear how FL identifies schools that are lowest performing over time, given the state’s single-year approach to assigning letter grades and comprehensive support designations.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL’s plan must clarify that its methodology to identify comprehensive support and improvement schools results 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.  FL must revise language on page 24 “Florida would identify…” to confirm that the state “will identify” schools.

**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>	Using the graduation rate results based on the four-year ACGR calculation, the SEA intends to identify as CSI those “graded” schools with graduation rates of 67% or lower beginning in 2018-19. (p.25)  Qualifying that “graded” schools’ graduation rates will comprise the pool from which these low-graduation rate schools are identified appears to exclude those alternative/ESE schools that may choose not to be graded from this calculation. As the calculation requires “all public high schools” to be part of the denominator in this calculation, this is unallowable.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	The SEA fails to address how public high schools that may not have a school grade (e.g. alternative/ESE) will be accounted for in this identification system based on low graduation rate.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet</i>	The SEA must address how public high schools that may not have been awarded a school grade (e.g. alternative/ESE) will be accounted for in this identification system based on low graduation rate.

*this requirement*

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>FL does not meet the requirements for identification of targeted support and improvement schools, as the state plans to identify such schools solely on the basis of the school’s letter grade, which does not take into account the low performance of individual subgroups except—in part—the performance of the school’s lowest performing 25% of students. The state’s plan indicates that all D-graded schools, apart from those assigned a D grade for two consecutive years, will be designated for targeted support and improvement. As such, in responding to this item, FL indicates that targeted support schools may move to comprehensive support status only if the school receives a consecutive grade of D or a grade of F. Pages 24-25.</p> <p>The state’s methodology to transition Targeted Support schools to Comprehensive Support and Improvement schools is based on the school’s grade qualifying it as a Comprehensive Support and Improvement school (meaning, it receives a “D” grade consecutive to that which qualified it for Targeted Support status initially or it receives an “F” grade, which automatically qualifies a school for Comprehensive Support.)</p> <p>Such schools would be identified beginning in 2019-20, because the first year in which a school might be considered Targeted Support is 2018-19.</p>
<i>Strengths</i>	N/A
<i>Weaknesses</i>	<p>FL does not meet the requirements for identification of targeted support and improvement schools.</p> <p>There is no correlation between this identification and consistently poor subgroup performance, as no subgroups’ performance or progress is included in the state’s accountability system.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet</i>	FL must modify its approach to identifying schools for targeted support and improvement in order to meet the ESSA requirements for identification of such schools.

<i>this requirement</i>	
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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>	FL indicates that it will identify schools for comprehensive support and improvement on an annual basis. Page 25.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	It is unclear how FL identifies schools that are lowest performing over time, given the state’s single-year approach to assigning letter grades and comprehensive support designations.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) <input type="checkbox"/> No
<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>FL does not meet the requirements for identification of targeted support and improvement schools, as the state plans to identify such schools solely on the basis of the school’s letter grade, which does not take into account the low performance of individual subgroups except—in part—the performance of the school’s lowest performing 25% of students. The state’s plan indicates that all D-graded schools, apart from those assigned a D grade for two consecutive years, will be designated for targeted support and improvement. As such, in responding to this item, FL indicates that targeted support schools may move to comprehensive support status only if the school receives a consecutive grade of D or a grade of F. Pages 24-26.</p> <p>FL will identify all schools that receive a school grade of “D” as Targeted Support and Improvement schools. This identification is based on all indicators in the accountability matrix apart from progress in ELP, and appears to include either the All Students subgroup only, or for Progress, the All</p>

	<p>Students and “Lowest Performing 25%” subgroup created by the SEA. The other traditional subgroups’ performance is reported on, but not included in the calculations of the school grade – and thus could not comprise a part of the identification process for Targeted Support schools.</p> <p>The SEA does not explicitly define ‘consistently underperforming’, however it appears to consider a school (not a subgroup) as consistently underperforming and in need of Targeted Support as a school that fails to increase its letter grade from a “D” over a one year period.</p>
<i>Strengths</i>	N/A
<i>Weaknesses</i>	<p>FL does not meet the requirements for identification of targeted support and improvement schools.</p> <p>The first data chart on p.26 purports to reveal the lower indicator performance of the “D” rated schools, however these schools are compared to aggregated performance scores of “A”, “B” and “C” rated schools which does not allow for equal comparison or validation that “D” schools are struggling any more than “C” schools might be. In addition, the indicators do not include data from individual subgroups (per the indicators’ calculation rules), so this information elucidates nothing in terms of subgroup performance in schools receiving various grades.</p> <p>In addition, column 1 of the chart is titled “Gap Between Subgroups and All Students Statewide”; however, it is not apparent where the All Student gap-comparison data is located on the chart.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The SEA must define ‘consistently underperforming’ not at the school level, but at the individual subgroup level. This definition must include the SEA’s threshold for “consistent underperformance” of a subgroup and the calculation must include analysis of subgroup performance in every indicator of the state’s system of Annual Meaningful Differentiation, including EL Progress in Achieving ELP.</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>FL’s plan uses the same methodology for identifying schools for Additional Targeted Support as for Targeted Support and Improvement. However, FL does not meet the requirements for identification of targeted support and improvement schools, as the state plans to identify such schools solely on the basis of the school’s letter grade, which does not take into account the low performance of individual subgroups except—in part—the performance of the school’s lowest performing 25% of students. The state’s plan indicates that all D-graded schools, apart from those assigned a D grade for two consecutive years, will be designated for targeted support and improvement. As such, in responding to this item, FL indicates that targeted support schools may move to comprehensive support status only if the school receives a consecutive grade of D or a grade of F. Pages 24-26.</p> <p>FL is identifying schools for Targeted Support based not on individual subgroup performance, but rather the overall school performance (which does not factor subgroup data into the calculation at all).</p> <p>Identification would take place annually beginning in 2018-19.</p>
<i>Strengths</i>	N/A
<i>Weaknesses</i>	<p>FL’s plan lacks a methodology that serves 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).</p> <p>FL does not meet the requirements for identification of targeted support and improvement schools.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>FL’s plan must provide evidence that its Additional Targeted Support methodology serves 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).</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>	N/A
<i>Weaknesses</i>	N/A

<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>FL’s plan allows for local feedback when a school received a label of Incomplete due to low participation rates.</p> <p>FL indicates that state law requires that all students participate in statewide assessments but also provides two categories of exemptions, “extraordinary exemptions” and “medical complexity exemptions”. Provided details are scarce but it appears that such exemptions must be requested in advance of testing by IEP teams. FL states that if a school assesses less than 95% of its students it is assigned a preliminary school grade of “Incomplete” and an analysis is conducted to attempt to determine whether the performance of assessed students “is representative of the school’s progress” overall. If the state determines that performance is representative a school grade is assigned and published. It is unclear how this approach mitigates the possibility that schools attempt to influence assessment results by not assessing certain low performing students. Further, it appears that there are no specific consequences when assessment results for subgroups of students fall below 95%. Page 27.</p> <p>From an accountability standpoint, however, neither subgroups’ lack of full participation nor consideration of the degree to which the school failed to meet the testing requirement is addressed. This element is not a component of the SEA’s accountability system, though it is reported out on school and district report cards.</p>
<i>Strengths</i>	FL encourages participation in statewide assessments through rules codified in state law, while recognizing that there may be certain instances of legitimate non-participation.
<i>Weaknesses</i>	<p>FL’s approach does not appear to apply meaningful consequences to schools that assess less than 95% of their students, either in the aggregate or for subgroups.</p> <p>It is unclear how the commissioner’s assignment of a school grade, should an</p>

	Incomplete be assigned due to low participation rate, mitigates the possibility that schools may attempt to influence assessment results by not assessing certain low performing students. In addition, the criteria by which the commissioner assigns school grades to schools assessing fewer than 95% of its students lacks transparency.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL must describe how it factors the requirement for 95% participation of all students and 95% of all students in each subgroup of students in statewide mathematics and reading/language arts assessments into the statewide accountability system.  FL must ensure that schools are held accountable for assessing all students and that no exceptions to this requirement are authorized by the commissioner.

#### 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>	The criteria required to exit from Comprehensive Support and Improvement status is, within 2 years, a Comprehensive Support and Improvement school must improve its letter grade to a “C.” An optional ‘additional’ year of reprieve may be provided to a school deemed likely to achieve the “C” grade with a 3 <sup>rd</sup> year of supports. (p.28)
<i>Strengths</i>	Using the letter grade as an indicator of success is a straightforward, easy-to-explain approach.
<i>Weaknesses</i>	Given that the state plans to identify schools and assign letter grades on an annual basis using results from a single year, it is likely—particularly with small schools—that in certain cases a letter grade of C may not demonstrate meaningful improvement.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) <input type="checkbox"/> No
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet</i>	

*this requirement*

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>FL states that a targeted support school must improve its letter grade to exit the category” but does not indicate what school grade is necessary to exit. Given that the state does not appear to meet the requirements for identifying targeted support schools, it should revise its response to this item.</p> <p>Schools in Targeted Support status have one year to increase their letter grade in order to exit Targeted Support status. As noted in the analysis of Comprehensive Support and Improvement exit criteria, individual subgroup data is reported – but not calculated – in this system. Therefore, it would be impossible to A) know which subgroup’s performance so significantly impacted the “All Student” performance such that the school received a “D” grade and became a Targeted Support school OR B) which subgroup’s performance was so strong in the subsequent year that it positively impacted and raised the school’s grade, leading it out of TS.</p>
<i>Strengths</i>	N/A
<i>Weaknesses</i>	FL’s school identification system is not based on individual subgroup academic performance, and no evidence exists that schools exiting from such status are exiting based on improved performance in the individual subgroups that led to the school’s identification.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL must develop a system by which its identification of Targeted Support schools is based specifically on individual subgroup academic performance, and an exit criterion from such status that is based on individual subgroups’ improved performance.

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>FL’s plan is clear and appropriately meets the specified criteria.</p> <p>FL describes significantly more rigorous interventions for schools that do not earn a C grade after two years: such schools must close or turn over operations to a charter school or external operator.</p> <p>If a CSI school fails to attain a “C” grade within its two (or possibly three) allotted years, it must submit to the State Board of Education a new Turnaround Option Plan. In this plan, the school will choose to either:</p> <ol style="list-style-type: none"> <li>1. Reassign students to another school and monitor their progress</li> <li>2. Close and reopen as a charter (or multiple charter) school, with governing board(s) that have demonstrated effectiveness, or contract with an outside entity to operate the school, using instructional personnel that are employees of that entity.</li> </ol>
<i>Strengths</i>	<p>FL’s plan for school closure and forfeiture of operations to a charter or external operator poses high stakes to school leaders to exit comprehensive support and improvement status.</p> <p>FL demonstrates a clear commitment to meaningful change in low-performing schools.</p>
<i>Weaknesses</i>	<p>FL’s plan lacks a description of the Turnaround Option Plan.</p> <p>Two years is a very short period of time to demonstrate meaningful, lasting improvement.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (3)</p> <p><input type="checkbox"/> No</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>FL’s response to this item focuses on the allocation of state staff (regional field teams) to support districts with low performing schools. The state does not address broader, important aspects of resource allocation such as analysis of how low performing schools are staffed and funded within LEAs. Page 29.</p> <p>FL assigns field teams regionally throughout the 4 regions of the state based on the number of schools identified in each support category. The allocation of staff to field teams is reviewed annually and will vary based on the resources needed each year.</p>
<i>Strengths</i>	N/A
<i>Weaknesses</i>	<p>FL’s plan lacks specificity in action, tools, and outcomes on 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.</p> <p>No specifics are provided relative to the number or type (content specialty?) of staff that is assigned to support a CSI or TS school and how many schools each field team is expected to support. The number of field teams is not provided, so it is difficult to determine the level of individualized support that can be provided to assist CSI schools in exiting their status within the one year allotted them (or 2 years for TS schools).</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1) <input checked="" type="checkbox"/> No (2)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL must specify how it will conduct broader reviews of resource allocation in each LEA serving significant numbers or percentages of comprehensive and targeted support schools.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	FL describes implementation of a tiered system of support for low performing schools in the state, with the most intensive and direct support, including monitoring, provided in “Tier 3”. The approach described is sensible, targeting the state’s limited resources for school and district support to the neediest locations. Page 29.
<i>Strengths</i>	FL’s plan describes a process for support that is grounded in data analysis across multiple levels of support (Tiers I, II, and III).

<i>Weaknesses</i>	FL’s plan lacks a description of the Turnaround Option Plan.  When a 2 <sup>nd</sup> tier Turnaround Option Plan is developed for schools failing to exit CSI status in the required timeline, the school implements its closure or charter plan, and the district participates in quarterly progress monitoring data reviews with an SEA team. “Data is disaggregated by grade level and/or subject area for each school”; however, it does not appear to analyze data by subgroup level.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) <input type="checkbox"/> No
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

**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>	N/A
<i>Weaknesses</i>	N/A
<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>	<p>FL describes several legal and policy tools it has established to help ensure that children are not disproportionately served by ineffective, out-of-field, and/or inexperienced teachers, but does not provide any current data or a specific timeline for providing or publishing such data. Pages 30-31.</p> <p>The SEA’s definition of such teachers is provided, and the state report card (published online) will include information on whether Title I schools and low-income and minority children are served disproportionately by such teachers. The report will be generated at the school, district and state level. It is unknown at what frequency this report will be published or the timeline for its publication.</p>
<i>Strengths</i>	FL appears to have a strong legal and policy framework aimed at preventing children from being disproportionately served by ineffective, out-of-field, and/or inexperienced teachers, particularly in low-performing schools.
<i>Weaknesses</i>	FL did not provide any current data disproportionate rates or a specific timeline for providing or publishing such data.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL must describe the extent, if any, that low-income and minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers.

#### **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?

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<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.

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>FL’s plan lacks definitive evidence for the allowance of corporal punishment in positively impacting student learning outcomes.</p> <p>FL describes discipline <u>data reporting requirements</u>, and statewide <u>training on statutory requirements</u> regarding bullying and harassment as well as technical assistance for LEAs that is focused on successful discipline practices. The state’s response does not otherwise describe how it will support LEAs receiving assistance under Title I, Part A to improve school conditions for student learning, nor in reducing the use of aversive behavioral interventions. Page 32.</p> <p>FL indicates that state laws have been enacted to urge restraint in the application of zero-tolerance policies for smaller infractions.</p>
<i>Strengths</i>	N/A
<i>Weaknesses</i>	The state does not describe any specific approaches it takes to help improve school conditions, and/or maximize successful discipline practices in schools demonstrating the need for improvement/assistance.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL must describe the interventions that the SEA will undertake to assist Title I LEAs in improving school conditions, reducing incidences of bullying and harassment, minimizing the use of discipline practices that remove students from the classroom and reducing the use of aversive behavioral interventions that compromise student health and safety.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>FL describes a system-wide approach, articulated in the state’s strategic plan, to promote student transition from early childhood through to college/career success. Specific strategies at the middle and high school levels include the use of early warning systems, promotion requirements, dual enrollment, and accelerated graduation options. Pages 34-35.</p> <p>Programmatically, there exist a number of state statutes that require assessments, interventions or supports that schools must provide to students. FL indicates that these requirements (kindergarten readiness assessment, annual ELA and math assessments in grades 3-10 and grades 3-8, a K-8 early</p>

	academic warning system, accelerated coursework in middle school and post-secondary credit bearing courses in high school) meet the academic and transition needs of its students at the elementary, middle and high school levels.
<i>Strengths</i>	The state’s plan describes the Early Warning System that is in statute and that incorporates both academic and non-academic factors.
<i>Weaknesses</i>	Aside from the early warning system, few specifics were provided on how the state would work with LEAs to decrease the risk of students dropping out.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) <input type="checkbox"/> No
<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>	Apart from feedback received in a federal program administrators’ meeting, gathered via the SEA website when the draft plan was posted for public comment, and by special invitation to comment from various interest groups a brief description of a stakeholder feedback session, FL does not describe how it will establish and implement standardized statewide entrance and exit procedures for ELs. Page 46.  FL assures that all potential ELs are screened for such status within 30 days of enrollment in a public school.
<i>Strengths</i>	FL has codified its 30-day screening policy in written rules approved by the state Board of Education.
<i>Weaknesses</i>	FL has not provided information about its plan to establish and implement standardized statewide entrance and exit procedures for ELs.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3)

<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	FL must describe how it will establish and implement standardized statewide entrance and exit procedures for ELs.
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**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>	<p>FL describes its statewide system of support for districts and schools, and highlights specific instances of support for EL learners and their teachers. Pages 46-47.</p> <p>FL states that its academic goal relative to ELs is to decrease their achievement gap, as compared to non-ELs, on the ELA, math, social studies and science content area assessments. To support content achievement, the SEA recently analyzed 2015-2016 data at the student, school and LEA level to determine whether there were common areas of improvement needed at a local or regional level. The data examined included “student achievement data, graduation rates, promotion rates and discipline rates.” No mention is made of data analysis performed at the EL subgroup level or of language proficiency data.</p> <p>Although a sample of an EL-specific intervention strategy was noted for both Tier 2 and 3 supports, the strategies focus on providing professional development or instructional support for ELs in the content areas (p.47).</p>
<i>Strengths</i>	<p>The state’s plan describes its target to reduce the gap between this and other subgroups by one third in ELA, mathematics, science, and social studies.</p> <p>FL considers support for EL students as part of its overall support for schools and districts.</p>
<i>Weaknesses</i>	<p>FL’s response to this item is more general than specific.</p> <p>FL does not address supports it provides to specifically target improvement of ELs’ English language proficiency and includes only cursory mention of content-area supports (technical assistance, conference calls, presentations at stakeholder meetings)</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2) <input checked="" type="checkbox"/> No (1)
<i>If no, describe the specific information</i>	FL must describe how it will provide support to LEAs in assisting their ELs in achieving English language proficiency, not solely content achievement. The

<i>or clarification that an SEA must provide to fully meet this requirement</i>	state must also describe how EL subgroup performance, in both content and language proficiency, is accounted for in its Multi-tiered System of Support.
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### E.3: Monitoring and Technical Assistance (ESEA section 3113(b)(8))

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	<p>One reviewer indicated that the state’s plan is clear and appropriately meets the specified criteria.</p> <p>FL describes its approach to reviewing and monitoring LEAs that receive Title III subgrants, indicating that each Title III district participates in some form of monitoring each year and that the state annually collects and analyzes student and program data which is then used to determine “risk factor” areas for each district. Additionally, the state describes its tiered system of support as it applies to Title III districts and/or support for EL students. Page 47.</p> <p>The SEA conducts annual reviews of the projects conducted by all Title III recipients (which includes a risk factor analysis). Based on these analyses, the SEA determines the type of monitoring that will be conducted in each LEA: Onsite, Desktop, Targeted Desktop and/or Self-Monitoring. Any findings issued subsequent to monitoring must be addressed in a System Improvement Plan which addresses the corrective actions to be taken toward resolution. The LEA is monitored until the deficiencies are corrected.</p> <p>District support plans are developed at three tiers based on SEA examination of student achievement data, graduation rates, promotion rates and discipline data, which do not indicate subgroup-level or language proficiency score analyses</p>
<i>Strengths</i>	<p>The state’s plan describes its target to reduce the gap between this and other subgroups by one third in ELA, mathematics, science, and social studies.</p> <p>One reviewer indicated that the state appears to have a standardized, comprehensive approach to reviewing, monitoring, and supporting the performance of Title III districts.</p>
<i>Weaknesses</i>	<p>According to the state, findings issued subsequent to monitoring must be addressed in a System Improvement Plan which addresses the corrective actions to be taken toward resolution and the LEA is monitored until the deficiencies are corrected, however no required timeline for this corrective action is provided.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2) <input checked="" type="checkbox"/> No (1)

<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>The SEA must develop support and technical assistance strategies for LEAs that specifically address ineffective language acquisition programs in addition to its supports for content area improvement.</p>
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