

STATE PLAN PEER REVIEW CRITERIA Peer Review Notes Template

STATE: Georgia



U.S. Department of Education

Background

Peer reviewers apply their professional judgment and experiences when responding to the questions in response to the criteria below. Consistent with section 1111(a)(4)(C) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA), peer reviewers will conduct an objective review of State plans in their totality and out of respect for State and local judgments, with the goal of supporting State- and local-led innovation and providing objective feedback on the technical, educational, and overall quality of a State plan, including the validity and reliability of each element of the State plan. Peer reviewer notes inform the written determination of the Secretary regarding the consolidated State plan.

Role of the Peer Reviewers

- Each peer reviewer will independently review a consolidated State plan with respect to the criteria for Title I, Part A and Title III, Part A and record his or her responses to the questions. Each peer reviewer will note where changes may be necessary for a State educational agency (SEA) to fully address statutory and regulatory requirements and may also present suggestions to improve the State plan or to highlight best practices. Each peer reviewer will create his or her individual recommendations to guide the in-person review. These individual recommendations are submitted to the Department but will not be shared with the State.
- A panel of peer reviewers will meet in person to discuss each SEA's plan. The panel of peer reviewers will generate one set of peer review notes that reflects its collective review and evaluation of the SEA's consolidated State plan, but the panel is not required to reach consensus. The notes should reflect all peer reviewer perspectives on each requirement.

After the peer review is completed, each SEA will receive the final peer review notes that include the peer reviewers' responses to the questions and any recommendations to improve the SEA's consolidated State plan. The peer review notes: 1) constitute the official record of the peer review panel's responses to questions regarding how an SEA's State plan addresses the statutory and regulatory requirements; 2) provide technical assistance to the SEA on how to improve its State plan; and 3) recommend to the Secretary what, if any, additional information to request from the SEA. Taking into consideration the peer reviewers' recommendations, the Department will provide feedback to each SEA that outlines any areas the SEA must address prior to the Secretary's approval of its consolidated State plan. If a State plan cannot be approved, the Department will offer the SEA an opportunity to revise and resubmit its State plan and have a hearing, consistent with ESEA section 8451.

Consistent with ESEA section 1111(a)(5), the Department will make publicly available all peer review guidance, training, and final panel notes. The names of peer reviewers will be made publicly available at the completion of the review of all consolidated State plans. The peer reviewers for any individual State will not be made publicly available.

How to Use This Document

The peer review criteria are intended to: 1) support States as they develop their consolidated State plans, and 2) inform peer reviewer panels as they evaluate each consolidated State plan. This document outlines the required elements that an SEA must address in its State plan in order to fully meet the applicable statutory and regulatory requirements. If an SEA has provided insufficient information for peer reviewers to determine whether any requirement is fully addressed, peer reviewers should indicate that the SEA has not fully addressed that requirement and identify what additional information or clarification may be needed. Note that responses to some elements are required only if the specific circumstances addressed in the question are applicable to the SEA submitting the consolidated State plan (*e.g.*, if the SEA establishes an extended-year adjusted cohort graduation rate in addition to a four-year adjusted cohort graduation rate

in item A.4.iii.b.2 below). For these particular questions, if the circumstances addressed in the question do not apply to the SEA, the SEA is not required to answer the question in order to fully address the statutory and regulatory requirements.

Instructions

Each peer reviewer should include individual review notes in the space provided below each consolidated State plan requirement. For each consolidated State plan requirement, a peer reviewer will provide:

- **Peer Analysis**: Describe the peer reviewer's justification for why an SEA did or did not meet the requirement;
- **Strengths**: Summarize the strengths of an SEA's response to the State plan requirement;
- **Weaknesses**: Summarize the weaknesses of an SEA's response to the State plan requirement, including issues, lack of clarity, and possible suggestions for technical assistance; and
- **Assessment**: Determine if the SEA met the State plan requirement (indicated by Yes/No)
 - If the peer reviewer indicates 'No' above, the peer reviewer must describe the specific information or clarification that a State must provide in order to meet the requirement.

The peer reviewer notes should address all of the required elements of each State plan requirement in this document, but need not address each element individually (*i.e.*, the peer reviewer notes should holistically review A.3.i about the SEA's definition for native languages, incorporating each of the four bulleted items in this element but need not individually respond to each bullet).

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

A.1: Challenging State Academic Standards and Assessments

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA describes the strategies to provide all students with opportunity to be prepared for and take advanced math coursework in middle school. The SEA administers end of course math assessments in Algebra I, Coordinate Algebra I, Accelerated Algebra I/Geometry A, or Accelerated Coordinate Algebra/Analytic Geometry A. These assessments are administered to middle school students who take high school level math courses. The SEA also describes the strategies to expand access to accelerated coursework through virtual opportunities.</p> <p>The SEA plans to request a waiver to extent the ESSA flexibility in this section to additional middle school grades.</p> <p>The SEA does not indicate expectations for student access to advanced math courses or a threshold of access to such courses for all students across the</p>

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

	state. Even though virtual learning options are provided, it is unclear how all students would be aware of and provided such opportunities.
<i>Strengths</i>	<p>The SEA has developed comprehensive resources to accelerate mathematics across middle school years and has described provisions for virtual learning.</p> <p>The acceleration methods described were clear and concise.</p> <p>The SEA provides extensive support for students taking advanced courses, including exemplar curricula and online options through the GA Virtual School that are often accessed by students in rural areas.</p>
<i>Weaknesses</i>	The SEA does not fully describe how it will ensure equitable access to advanced mathematics programming.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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.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>	The SEA provided an extensive analysis of the extent to which other languages were being spoken in the state. The analysis was driven by a diverse group of stakeholders. While many languages are spoken in GA to some extent, only Spanish was identified as a language that was “present to a significant extent.” The state established a metric that, to be present to a significant extent, the language must be spoken by at least 3% of the population; Spanish is spoken by about 5% of the participating student population (though by a lower percentage of all students, around 3%).

<i>Strengths</i>	The state went through a rigorous process of identifying the incidence of languages spoken throughout the state, and was responsive to each of the requirements and definitions in the statute, including specific analyses of Native American languages and discussion of various strategies to effectively support non-English speakers to gain proficiency.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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.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>	By statute, GA is an English-only state and therefore it does not offer assessments in any other language.
<i>Strengths</i>	The plan described a range of strategies to help ELs gain proficiency.
<i>Weaknesses</i>	Despite having identified Spanish as a language present to a significant extent, the SEA will not establish assessments in Spanish.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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.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>	The SEA identified Spanish as the language that is present to a significant extent in the student population. However, the SEA does not believe that assessments in Spanish would be needed. In addition, the SEA response indicated state statute requires all assessments

	be administered in English.
<i>Strengths</i>	
<i>Weaknesses</i>	The SEA did not indicate a need for Spanish assessments even though that language is present to a significant extent.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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.3.iv: Efforts to Develop Assessments

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>N/A - English is designated as the official language of the State of Georgia (O.C.G.A. – 50-3-100). All assessments are administered in English.</p> <p>The state conducted an extensive peer review of the incidence of other languages spoken throughout GA. They concluded that only Spanish was spoken to a considerable extent, and even then Spanish speakers were concentrated in a smaller number of LEAs. The state will not develop assessments in Spanish, based on a combination of relatively low incidence of Spanish-speaking students (about 3% statewide) and state statute deeming it an “English only” state.</p>
<i>Strengths</i>	The SEA makes translated students score report templates available to families.
<i>Weaknesses</i>	The SEA did not provide any evidence that it gathered input from stakeholders nor was there any indication the SEA intended to respond to this

	indicator given state statute.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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: 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>	The SEA lists all major and ethnic groups to be included as subgroups in its accountability system. The SEA identifies the following racial and ethnic groups: American Indian/Alaskan, Asian/Pacific Islander, Black, Hispanic, Multi-Racial, White (p. 12)
<i>Strengths</i>	
<i>Weaknesses</i>	There is no rationale provided why the SEA is combining Asian and Pacific Islander as one subgroup. This has the potential to dilute critical subgroup information.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

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

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

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

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

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

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

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

A.4.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>	The SEA has established a minimum N-size of 15 for all subgroup analysis and reporting, and an N-size of 40 if scores need to be statistically adjusted due to insufficient participation rates.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA a conducted a thorough study to determine the most rigorous and statistically sound N, and determined that an N-size of 15 was reliable and valid and maximized the number of subgroups that could be reliably disaggregated.
<i>Strengths</i>	<p>The SEA’s extensive analysis is designed to hold as many schools accountable as it can for subgroups, while not compromising privacy issues.</p> <p>The plan provides detailed analyses that show the confidence interval using an N-size of 15 does not significantly decrease as N-size gets larger.</p>
<i>Weaknesses</i>	It is unclear whether a minimum N of 40 will result in statistically sound adjustments, due to low participation rates, to achievement data.

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

<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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.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>	The SEA has utilized a minimum N-size of 15 for school accountability since 2012.
<i>Strengths</i>	The SEA convened three different groups to decide this issue, including an ESSA Accountability Working Committee, a Federal Programs Working Committee (which included educators and stakeholders), and a Technical Advisory Committee.
<i>Weaknesses</i>	It is unclear whether parents participated in the N-size determination process. It is possible they were included in the various advisory groups but that is not stated.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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.ii.d: Minimum N-Size and Ensuring Student Privacy (ESEA section 1111(c)(3)(A)(iii))

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

³ See footnote 5 above for further guidance.

	<i>Peer Response</i>
<i>Peer Analysis</i>	The plan states that subgroup reporting will not be done for any subgroup denominator lower than 15. Also, to further protect privacy N-size will not be reported, only the proficiency measures for each subgroup.
<i>Strengths</i>	As an additional privacy guarantee, the SEA does not include N-sizes when reporting subgroup data. The SEA also indicated that additional suppression rules may be identified as it becomes more experienced with accountability reporting.
<i>Weaknesses</i>	Not reporting subgroup N-sizes may dilute the transparency of reporting.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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.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 – the minimum number of students for purposes of reporting is the same as the minimum number of students for purposes of accountability.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	It took the peer reviewers a long time to work through the complexities of this section of the plan. One of the peer reviewers believes that the plan met the statutory requirements given that the SEA provided long-term goals for all students and all subgroups for improved academic subgroups and a clear description of possible movement toward those long-term goals along a timeline of 15 years was given for all students and subgroups. However, the other peer reviewers believed the plan did not establish firm and rigorous long-term goals with an understandable timeline. In particular, it was not clear how resetting the targets every five years affected the long-term targets.
<i>Strengths</i>	One reviewer believed that the SEA’s approach recognizes the need for continuous improvement over time and that the baseline is different for each subgroup of students. The SEA provides a detailed, complex description of how it has calculated the 3% growth and lessons learned from the previous approach which did not yield desired outcomes. Baseline data is clearly articulated.
<i>Weaknesses</i>	In general, the peer reviewers found the description of the SEA’s long-term goals difficult to follow. Some sections of the plan are inconsistent about required achievement targets, e.g., whether the highest-achieving group must make progress towards the target or just stay above 90% proficiency. The state indicates that all schools and all students will participate in the new accountability system. However, there is some information provided that appears to be inconsistent with that, including the discussion about LEAs with charter schools and two LEAs that do not have SWSS performance contracts (no reason is provided). And in a later section of the plan (page 35), there is a reference to “eligible” public schools without an explanation of what that means. It is not clear how the 5-year “reset” will affect the subsequent interim and long-term targets for schools and subgroups not meeting annual targets.

	<p>The peer reviewers do not believe that reduction of the achievement gap by 45%, over 15 years, represents a rigorous long-term goal, particularly for the lowest-achieving groups. For instance, even after 15 years the target ELA proficiency level for the Black subgroup would only be at 69%, for Hispanics it would be 72%, and for students with disabilities it would be 67%, which are not sufficiently ambitious targets. Even if targets are fully attained after 15 years, substantial achievement gaps will exist and substantial percentages of students will still not meet proficiency levels.</p> <p>For the highest-achieving subgroups, merely maintaining proficiency levels of 90% or above is not a rigorous long-term target.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 # peer reviewer(s)) <input checked="" type="checkbox"/> No (3 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The SEA must develop a plan that includes ambitious long-term targets that do not result, 15 years later, with large numbers of students still not proficient and with substantial achievement gaps remaining</p> <p>The SEA must provide a more detailed explanation of how the five-year adjustment (the “reset”) will affect the long-term goals for groups not meeting the annual targets.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA provides measurements of interim progress towards meeting the long-term goals for all students and for each subgroup of students. In Appendix A, the state provides an example of state-level targets using 2016 data as the baseline year. Targets will be calculated individually for all students and for each subgroup of students for each school and each LEA using the 2017 data as the baseline.</p> <p>However, targets will be reset every five years to ensure that schools do not hopelessly fall behind over time, but the plan does not describe how that will affect interim or long-term goal attainment.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	It is not clear how the five-year reset will affect interim goals.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The plan proposes, long-term, to reduce achievement gaps by 45% over 15 years. This is different, however, than eliminating an achievement gap. Even if every assumption for growth over 15 years is met, there will continue to be large achievement gaps remaining between subgroups.</p> <p>The further behind a school or subgroup is, the greater the improvements they must make to meet both interim and long-term targets. However, even if these targets are met substantial achievement gaps will remain in place.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Growth goals for high achieving subgroups are smaller and may have the unintended consequences of messaging students, families, and other stakeholders that the SEA has set lower expectations for certain subgroups of students.</p> <p>The plan does not adequately address how a five-year reset will affect the closure of achievement gaps among subgroups.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>In particular, the plan must be revised to include more rigorous long-term and interim progress goals to make significant progress in reducing the achievement gap, particularly for the lower-achieving subgroups.</p> <p>More detail is needed about the effects of resetting targets every five years, and whether those resets will make it more difficult to attain the long-term goals.</p>

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	One of the peer reviewers believes that the plan met the statutory requirements

	as the SEA provided long-term goals for all students and all subgroups for improved graduation rates among subgroups. However, the others believed the plan did not establish firm and rigorous long-term graduation rate goals with an understandable timeline. In particular, it was not clear how resetting the targets every five years affected the long-term targets. In addition, the peer reviewers did not agree that graduation rate goals below 90% were ambitious.
<i>Strengths</i>	One reviewer believed the proposed long-term graduation rate targets were attainable and, for most subgroups but not all, ambitious.
<i>Weaknesses</i>	<p>The attainment of a 3% gap reduction annually over 15 years for each subgroup does not provide for ambitious long-term goals for the lowest-performing subgroups.</p> <p>The graphic on page 21, “Illustration of New Improvement Targets,” is not at all realistic in terms of graduation rates. It maps trajectories starting at 0% graduation rates for schools, which is unrealistic. Also, the plan does not specifically focus on attaining graduation rates above 67% for some subgroups, the rate below which schools will be targeted for Comprehensive Support and Intervention (CSI) status.</p> <p>Overall, the four-year adjusted cohort graduation rate target (for all students) does not rise to the national goal of a 90% graduation rate by 2020.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 # peer reviewer(s)) <input checked="" type="checkbox"/> No (3 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The SEA must develop a plan that includes ambitious long-term graduation rate goals, particularly for low-performing subgroups at baseline. For instance, a long-term goal of going from 56% graduation rate to only 76%, over 15 years, is not ambitious.</p> <p>The SEA must provide a more detailed explanation of how the five-year adjustment (the “reset”) will affect the long-term graduation rate goals for groups not meeting the annual measurements of interim progress.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA proposes to use the same methodology for establishing graduation rate goals for both the extended, five-year cohort and the four-year cohort, for

	all students and all subgroups. In Appendix A, the plan describes how the adjusted five-year graduation rate goals will be more rigorous than the four-year cohort graduation goals.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iii.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>The SEA provided a concise method for determining annual measurements of interim progress for all students and all subgroups.</p> <p>Progress will be assessed each year, with the expectation that all students and all subgroups will attain a 3% annual reduction in the graduation rate gap between the 2017 baseline and a 100% graduation rate. Every five years the targets will be reset, based on actual progress over the previous five years.</p> <p>The plan describes two competing strategies: (1) the philosophy of setting attainable goals (i.e., a 3% gap reduction) to encourage continuous improvement, and (2) establishing a fixed long-term goal of a 45% gap reduction over 15 years. The panel doesn't understand how a five-year reset process could accommodate both goals simultaneously.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Again, it is unclear how resetting graduation rate targets after five years will affect how subgroups progress toward meeting long-term goals. The plan would be stronger if it were clear how the five-year reset process will affect either the interim progress measure or the long-term goal.</p> <p>Providing an incremental annual timeline for each subgroup would improve the plan.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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.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>The SEA’s long-term goals and measurement of interim progress for the four-year adjusted cohort graduation rate and five-year extended cohort graduation rate take into account the improvement necessary for subgroups of students who are behind in reaching those goals to make progress in reducing statewide graduation rate gaps.</p> <p>However, the measurements of interim progress and long-term goals are not sufficient to “make significant progress in <i>closing</i> statewide graduation rate gaps.”</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The proposed methodology reduces but does not close, or eliminate, graduation rate gaps.</p> <p>The plan does not discuss how the five-year reset will affect the closure of graduation rate gaps among subgroups.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 # peer reviewer(s)) <input checked="" type="checkbox"/> No (2 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>In particular, the plan must be revised to include more rigorous graduation rate long-term and measurements of interim progress that will result in significant progress in reducing, statewide graduation rate gaps.</p> <p>More detail is needed about the effects of resetting targets every five years, and whether those resets will make it more difficult to attain the graduation rate long-term goals.</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>The SEA is a member of the WIDA Consortium and administers the ACCESS for ELs 2.0 as an annual measure of English language proficiency for students identified as English Learners (ELs).</p> <p>The SEA identifies performance bands aligned to ACCESS composite scores, with the expectation that ELs progress one band per year from the respective band in which students initially identified. In Appendix A (p. 97), the SEA provides baseline data, annual measurements of interim progress, and long-term goals for the percentages of elementary, middle and high school students who make adequate annual progress toward English language proficiency.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The research cited in this section is very dated, and underestimates how quickly students can attain English language proficiency (as based on newer research). More recent research indicates that a reasonable amount of time to attain ELP is four-five years, not the seven years established in the plan.</p> <p>Therefore, the SEA’s proposed timeline to achieve English language proficiency is not ambitious. In addition, three peer reviewers did not believe that progress, even if made each year, would ensure students were English-language proficient given the low cutoff score (4.3 composite score on the ELP assessment).</p> <p>It is unclear what the 3% annual gain actually measures. This could be made clearer by providing labeling on the “Progress Towards English Language Proficiency” table (p. 97).</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 # peer reviewer(s)) <input checked="" type="checkbox"/> No (3 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The peer review panel did not believe that the English language proficiency (ELP) long-term goals are ambitious because it assumes it takes seven years to attain proficiency. The SEA must revise its plan based on more recent research on the topic of attaining English language proficiency to establish a more ambitious timeline (4-5 years instead of 7) and English language proficiency attainment level.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA plan establishes annual measurements of interim progress towards the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency. The data table (p. 97) includes baseline data, annual measurements of interim progress, and long-term goals over a period of 15 years.</p>
<i>Strengths</i>	

<i>Weaknesses</i>	Again, it is unclear how resetting growth toward English language proficiency targets after five years will affect how students will progress toward meeting long-term goals.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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.iv: Indicators (ESEA section 1111(c)(4)(B), 1111(c)(4)(E)(ii))

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

A.4.iv.a: Academic Achievement

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA’s academic achievement indicator for elementary and middle schools is based on proficiency targets on the statewide reading language arts and math assessments. However, in the table on p. 37, the SEA also includes a “closing gaps” measure for reading language arts and mathematics which does not meet statutory requirements for the academic achievement indicator (note: this metric could be a valid measure of “Other Academic Indicator” for non-high schools or could be designated as a School Quality and Student Success (SQSS) measure).</p> <p>At the high school level, the SEA includes proficiency on reading language arts and mathematics assessments, a “closing gaps” in reading language arts</p>

	<p>and mathematics measure, and a measure for growth in reading language arts and mathematics. However, the “closing gaps” measure is not an allowable measure for the academic achievement indicator (note: the “closing gap” measures could be used within the SQSS indicator).</p> <p>The SEA proposes to use and extend the current College and Career Ready Performance Index (CCRPI) within the plan; however (as noted above), the CCRPI categories do not align with the ESSA accountability components and requirements as presented.</p> <p>The SEA does indicate that all components of the index will be disaggregated by all students and subgroups.</p> <p>The SEA’s plan includes a detailed description of the College and Career Ready Performance Index (CCRPI), a state accountability system that has been in place since 2012. The CCRPI equally weights ELA and math achievement.</p> <p>Each indicator will be reported on a 100-point scale with the percentage of students meeting the indicator translating to the percentage of points earned.</p>
<i>Strengths</i>	<p>The chart on p. 37 was helpful in understanding the components of the SEA’s accountability index (CCRPI).</p> <p>The CCRPI has already been in use for five years and the SEA should be in a good position to make needed revisions to the CCRPI to ensure alignment with the ESSA accountability indicators. The state has a data infrastructure in place, prepares annual reports, etc., that well positions them to quickly make the current system consistent with ESSA requirements.</p>
<i>Weaknesses</i>	<p>The SEA does not discuss many of the statutory requirements of this section, including validity/reliability of measures, disaggregation of subgroups and the effects of subgroup performance on a school’s CCRPI index score, or whether a school averages data.</p> <p>In addition, this section of the plan does not reference the academic achievement long-term goals described earlier and provides no information about how annual performance would ensure progress toward meeting the academic achievement long-term goals.</p> <p>The panel also could not determine how actual indicator measures were calculated, e.g., how do student-level scores of 0-1.5 result in an overall rating on a scale of 100. It was also not clear what the definitions are of the categories of Beginning, Developing, etc.</p> <p>The plan would be stronger if there was a description of how the weights in the tables on p. 36 and 37 were determined.</p> <p>The plan would be stronger if it explicitly addressed the issue of whether each indicator was based on at least 95% participation.</p> <p>The panel could not determine whether the initial calculation of achievement scores is done (section A.4.iv.a) using the statutory requirement that the</p>

	denominator be the greater of 95% or the number of actual students before employing additional calculations.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The SEA should revise the plan to ensure that all measures within the Academic Achievement indicator are consistent with ESSA requirements. In particular, the “closing gaps” measures do not meet statutory requirements for this indicator.</p> <p>The SEA should revise its plan to address the issues of validity/reliability of measures, disaggregation of subgroups, and the effects of subgroup performance on a school’s CCRPI index score, and whether a school averages data.</p> <p>The SEA should also clarify how the academic achievement index scores will ensure progress toward measurements of interim progress and academic achievement long-term proficiency goals.</p> <p>The plan must include descriptions of how actual indicator measures are calculated and the definitions of the performance levels. The SEA must ensure that the initial calculation of achievement scores is done (section A.4.iv.a) using the statutory requirement that the denominator be the greater of 95% or the number of actual students before employing additional calculations.</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>	The plan notes that Progress indicators will serve as the ESSA “other academic indicators.” For schools that are not high schools, student growth in reading language arts and math proficiency (as measured by Student growth percentiles) meet statutory requirements for the “other academic indicators.”

	<p>Growth will be reported for all students as well as subgroups of students and calculated in the same way across all grade spans in all LEAs. The CCRPI includes measures of student growth that are the “other academic indicator.” These are student growth percentiles that are weighted according to growth percentiles attained. The long-term goal is for all students to make at least 40th percentile growth but SGPs are reported. So long as minimum N-sizes are obtained, these measures are reported separately by subgroup.</p>
<i>Strengths</i>	<p>SGP growth ranges are aligned with the state’s teacher effectiveness system and set the expectations that students need to make academic improvements by demonstrating greater than 40th percentile growth.</p>
<i>Weaknesses</i>	<p>A clearer description of how the Student Growth Percentiles (SGPs) are calculated would make this plan stronger, as well as assurances that the assessments from which the student growth percentiles are calculated are reliable and valid.</p> <p>The SEA could describe its “other academic indicator” more clearly. As currently written, the reader has to cross-reference different sections of the plan in order to understand how “other academic indicators” are constructed. Additionally, the alignment presented between ESSA and CCRPI does not clearly show the “other academic indicator” category indicators.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (1 # peer reviewer(s))</p> <p><input checked="" type="checkbox"/> No (3 # peer reviewer(s))</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The SEA must provide assurances that the assessments used to generate growth measures are reliable and valid. The plan must also include a clear description of how SGPs are calculated.</p> <p>The SEA must clarify that “other academic indicators” are used for elementary and middle schools. The present table is not clear.</p> <p>The SEA must substitute the term “Other Academic Indicator” for “Student Growth” in the table on p. 37.</p>

A.4.iv.c: Graduation Rate

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

- If applicable, does the SEA’s description include how the State includes in its four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rates students with the most significant cognitive disabilities assessed using an alternate assessment aligned to alternate academic achievement standards under ESEA section 1111(b)(2)(D) and awarded a State-defined alternate diploma under ESEA section 8101(23) and (25)?
- Can the indicator be disaggregated for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA Graduation Rate indicator includes both the four- and five-year adjusted cohort graduation rates. This graduation rates indicator is consistent with the state’s long-term goals. Both graduation rates will be calculated and reported for all students and for each subgroup of students. The four-year adjusted cohort graduation rate for all students will comprise 2/3 of the weight allocated to the Graduation Rate indicator while the five-year adjusted cohort graduation rate for all students will comprise 1/3 of the weight.</p> <p>There is no specific discussion in this section about subgroup disaggregation, though the general description of the CCRPI says (p. 27): “While component scores will be calculated and combined to produce the overall CCRPI score, each indicator will be reported separately and disaggregated by subgroup.”</p>
<i>Strengths</i>	The differentiated weight structure emphasizes graduating students in four years but also incentivizes continuing to work with students who need additional time to meet graduation requirements.
<i>Weaknesses</i>	The plan does not discuss whether there are alternate diplomas for students with the most significant cognitive disabilities.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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.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>	The SEA clearly described how student progress toward English language proficiency is measured and that a score of 4.3 on ACCESS indicates English language proficiency. Progress toward English language proficiency is defined as moving up a state determined band on the ACCESS assessment for all grades 1-12.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # peer reviewer(s)) <input type="checkbox"/> No (# 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.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>The SEA describes clearly and in detail the components of the SQSS indicator: the Readiness Component, which includes literacy and attendance for all grade bands (elementary, middle, and high school); one additional component for elementary and middle schools – Beyond the Core (access to enrichment courses), and three additional components for high school- Accelerated Enrollment (e.g., AP, IB), Pathway Completion (e.g., CTE, world languages), and College and Career Readiness (e.g., SAT, Accuplacer). Indicators are applied consistently across all grade bands and will be disaggregated across all student subgroups.</p> <p>However, the panel is concerned about whether the high school indicators - Accelerated Enrollment, Pathway Completion, and College and Career</p>

	<p>Readiness - use a denominator that will significantly differentiate across schools. For instance, using only “graduates” instead of “seniors,” or “11-12th graders,” or “all students enrolled in a given year,” may differentiate less.</p> <p>For each of these indicators, the plan discusses their correlation with other measures of success, such as on-time graduation and cites research to support their inclusion in the state (and ESSA) accountability system.</p>
<i>Strengths</i>	<p>The SEA has clearly considered a broad range of indicators, with a notable focus on literacy throughout the grades. The SEA cites research to support its use of the various indicators and acknowledges that these opportunities go “beyond the core.”</p> <p>The SEA’s descriptions of each of the proposed SQSS indicators in clear and comprehensive, with a evidence-based rationale for why they are being included in the state accountability system.</p>
<i>Weaknesses</i>	<p>The SEA provides few details on how indicators are calculated, subsequently weighted to generate an overall rating, and how the components will be used to differentiate schools. The plan would be stronger if it provided additional explanation, such as an appendix giving an example of how the indicators are all combined to generate a school rating, of how the calculations are actually made.</p> <p>The panel is concerned that not all indicators appear to be comparable across schools. For instance, the “Beyond the Core” indicator will be based on students who earn a passing grade, which can vary substantially from classroom to classroom. Similarly, the College and Career Readiness indicator includes work-based learning experiences, which can also be subjective in their assessment.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 # peer reviewer(s)) <input checked="" type="checkbox"/> No (3 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The plan must provide additional explanation, such as an appendix giving an example of how the indicators are all combined to generate a school rating, of how the calculations are actually made.</p> <p>The plan must ensure that all indicators are comparable across schools.</p> <p>The plan must ensure that the indicators, in particular the HS only indicators, will differentiate across 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>	The SEA will report all indicators of the accountability system for all public schools, including charters based on a 100-point system with additional points for high levels of achievement in proficiency and growth. All indicators will include the performance of all students and each subgroup of students.
<i>Strengths</i>	The table on page 39 summarizes all of the components and indicators in the GA CCRPI state accountability system and mapping them to the specific ESSA requirements. In particular, the table is very useful in reconciling whether social studies and science proficiency scores contribute directly to state accountability (yes) and to ESSA accountability (no for academic achievement but yes for SQSS).
<i>Weaknesses</i>	The state needs to clarify (page 35) what “eligible” public schools refers to, given the accountability system must meaningfully differentiate among all public schools.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA plan must be revised to remove or to clarify what an “eligible” public school is, given that the accountability system must include all public schools.

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>The SEA clearly describes the weighting of each indicator in its system of annual meaningful differentiation with sufficiently greater weight to academic achievement while also including other academic, graduation rates and progress measures including for English language proficiency.</p> <p>Weightings for all components of the index are provided with a clear description that if the indicator is unavailable those points would be evenly distributed among the other components.</p>
<i>Strengths</i>	The plan provides a clear explanation on weighting of each indicator and provides a crosswalk between the ESSA categories, the CCRPI components and indicators, and the weight (expressed in terms of points out of 100) associated with each indicator.

	The chart on page 37 made it easier for the reader to understand point assignments for the required ESSA accountability components.
<i>Weaknesses</i>	The panelists question whether the weighting of only 3.5 (ES or MS) and 3.0 (HS) for ELP progress is “substantial.”
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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.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>	The SEA states that schools must have a “Content Mastery” score (i.e., ELA and mathematics scores) in order to be assigned a summative rating. When a school does not have a Content Mastery component score, an overall score will not be calculated; however, any available indicator and component data will be reported. The SEA plans to engage a group of stakeholders to examine ways to potentially enhance accountability for primary schools and engage stakeholders and explore alternate accountability models for alternative schools. It is not clear whether these schools will be ranked or identified for CSI or TSI.
<i>Strengths</i>	
<i>Weaknesses</i>	It is clear that some schools (e.g., those without Content Mastery scores) will not be included in statewide accountability system. The SEA does not identify the types of schools for which an accountability determination cannot be made.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA needs to develop a plan for identifying schools that are not proposed to be included in the accountability system and develop procedures for appropriately including them.

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>	The SEA proposes a relatively straightforward strategy for identifying CSI schools using a three-year weighted average of the CCRPI to determine the Title I schools that are in the lowest 5% of performance. Identification of CSI schools will begin in the 2018-19 school year, using three-year CCRPI data from the previous three years.
<i>Strengths</i>	The SEA has been using the CCRPI since 2012 so data are already available by which it can identify CSI schools.
<i>Weaknesses</i>	In the table on page 39, the third criteria category should be labeled as “Additional TSI...” and not just “TSI...”
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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.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>	The SEA indicated that all schools graduating less than 67% of its students will be targeted for CSI beginning in Fall 2018.

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

A.4.vi.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>	The plan notes that Title I schools already identified as TSI that have not exited based on chronic low subgroup performance over three years, will become CSI schools. However, the statute limits this criterion to “Additional TSI Schools” and not all TSI schools.
<i>Strengths</i>	
<i>Weaknesses</i>	The plan speaks about all TSI schools not exiting that status but it should have limited that criterion to Title I “Additional TSI Schools.”
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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.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>	The SEA plans to identify schools on an annual basis.

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA proposes that schools will be identified for TSI support if they have one or more subgroups that failed to make progress toward meeting subgroup achievement and/or four-year graduation rate improvement targets (based on long-term goals and measurements of interim progress) for two consecutive years AND when ranked according to the most recent three-year average for that subgroup(s) and content area/graduation rate(s), are among the lowest performing 5% of all eligible schools. All Title I schools meeting this criterion will be considered “low-performing” and will be eligible to move to the CSI list after three years of failing to exit the TSI list. These schools will be first identified for support in the fall of 2019 and will begin implementation in January of 2020.</p> <p>However, it appears the SEA is mixing together the criteria for TSI identification (all schools with persistently low-performing subgroups) and Additional TSI identification (Title I schools with both persistent low performance and performance below that of the lowest 5% of schools).</p> <p>The plan addresses each of the ESSA requirements by using the CCRPI index (which includes all accountability indicators) to assess status and progress of subgroups. By establishing annual performance targets a school can determine whether it meet those targets for two years in a row (the exit criterion) or do not.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The SEA does not differentiate between the categories of TSI and Additional TSI. The plan does not separately distinguish the criteria for TSI identification (all schools with persistently low-performing subgroups) and Additional TSI identification (Title I schools with both persistent low performance and performance below that of the lowest 5% of schools)..</p>

<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The plan must separately discuss entrance and exit criteria for TSI and Additional TSI schools.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA proposes that schools will be identified for TSI support if they have one or more subgroups that failed to make progress toward meeting subgroup achievement and/or four-year graduation rate improvement targets (based on long-term goals and measurements of interim progress) for two consecutive years AND when ranked according to the most recent three-year average for that subgroup(s) and content area/graduation rate(s), are among the lowest performing 5% of all eligible schools. All Title I schools meeting this criterion will be considered “low-performing” and will be eligible to move to the CSI list after three years of failing to exit the TSI list. These schools will be first identified for support in the fall of 2019 and will begin implementation in January of 2020.</p> <p>However, it appears the SEA is mixing together the criteria for TSI identification (all schools with persistently low-performing subgroups) and Additional TSI identification (Title I schools with both persistent low performance and performance below that of the lowest 5% of schools).</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The SEA does not differentiate between the categories of TSI and Additional TSI. The plan does not separately distinguish the criteria for TSI identification (all schools with persistently low-performing subgroups) and Additional TSI identification (Title I schools with both persistent low performance and performance below that of the lowest 5% of schools).</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s))

	<input checked="" type="checkbox"/> No (4 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The plan must separately discuss entrance and exit criteria for TSI and Additional TSI schools.

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>	The SEA identifies three additional categories. Differentiated state support will be made available to the following categories of schools, dependent upon the availability of funding and resources: <ul style="list-style-type: none"> • Schools identified as at-risk for CSI and TSI • Schools that exit CSI, TSI, and/or Turnaround designations but require additional supports to sustain improvement • Schools that fail to meet performance goals under their Charter or Strategic Waiver contracts
<i>Strengths</i>	The SEA is looking beyond those schools already identified for TSI or CSI to ensure it provides additional support to those schools that are on the margin and need to continue to improve.
<i>Weaknesses</i>	The SEA’s definition of the term ‘at-risk’ was not clear.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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>	The SEA proposes that if the participation rate for all students or a subgroup

	<p>of students falls below 95%, the achievement score for that group of students will be multiplied by the actual participation rate divided by 95%, provided that the minimum N-size of 40 for participation rate has been met (page 45).</p> <p>If the 95% participation rate is not attained for all students or for particular subgroups, the CCRPI score is adjusted downward less when schools were close to the target and more for when the participation target is missed by a greater amount.</p> <p>However, as noted earlier, it is not clear that the initial calculation is performed consistent with the statutory requirements (section A.4.iv.a).</p>
<i>Strengths</i>	The SEA is taking action to reduce the reported achievement scores for schools that fail to attain the 95% participation rate.
<i>Weaknesses</i>	It is not clear that the initial calculation is performed consistent with the statutory requirements (section A.4.iv.a).
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 # peer reviewer(s)) <input checked="" type="checkbox"/> No (3 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA must ensure that the initial calculation of achievement scores is done (section A.4.iv.a) using the statutory requirement that the denominator be the greater of 95% or the number of actual students before employing additional calculations.

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The plan proposes that schools can exit CSI status when they meet the exit criteria aligned to the entrance criteria.</p> <p>The plan provides clear exit criteria for CSI schools. They must both no longer be in the bottom 5% AND must show that they met interim achievement targets (3% reduction in gap between baseline and 100%). The baseline will be the highest of the previous three-year CCRPI. For high schools, they must attain a graduation rate greater than 67%. Schools will be re-evaluated annually to determine whether exit criteria are being attained.</p>

<i>Strengths</i>	
<i>Weaknesses</i>	<p>The plan would be stronger if it explicitly aligned these exit criteria to the SEA’s interim and long-term goals and framework of supports. The SEA plan would be stronger if it included strategies for how the state will assure that these schools in exit status will be able to sustain their trajectory of improvement.</p> <p>It is not clear how the 5-year “reset” will affect the subsequent interim and long-term targets for schools and subgroups not meeting annual targets.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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.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>The plan notes that schools can exit TSI when they both no longer meet the entrance criteria and show either progress toward or attainment of interim growth targets for all subgroups for two consecutive years.</p> <p>However, as noted earlier, the state plan fails to distinguish between TSI and Additional TSI schools.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	The plan does not respond to this requirement because it has not identified and discussed Additional TSI school identification and exit criteria.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must</i>	The plan must be revised to explicitly discuss exit criteria for additional TSI schools; in particular, how such schools are identified and how they can exit that status.

provide to fully meet this requirement

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>In this section, it is implied that the SEA identifies “Designated Turnaround Schools” as those needing more rigorous state-determined action, but the SEA does not specify either entrance or exit criteria for such schools. In particular, this section does not address the specific issue of CSI schools that fail to meet the state’s exit criteria within a specified number of years.</p> <p>The SEA does describe a range of interventions and supports that will be provided to all schools, TSI schools, CSI schools, and Designated Turnaround Schools. The quality and impact of those proposed services is not discussed.</p>
<i>Strengths</i>	<p>The plan provides extensive detail on resources and services that will be provided in a tiered fashion to schools with different levels of need.</p> <p>State law prioritizes the use of federal and state resources to provide extensive intervention and support services to schools identified by the state turnaround officer as those in greatest need.</p>
<i>Weaknesses</i>	<p>The plan does not provide information as to what a “more rigorous state-determined action” might be. There is no specific information about local school leaders and school staff are involved in the process of determining these more significant actions.</p> <p>The plan does not explicitly describe the relationship, if any, between CSI schools that fail to exit and “Designated Turnaround Schools.” There is an indication in Appendix G that Designated Turnaround Schools are a subset of CSI schools.</p> <p>The state did not designate a time period for non-improving CSI schools after which “more rigorous interventions” must take place.</p> <p>It was not clear what data will be used to determine the interventions and supports offered to schools in continued CSI or Turnaround status, or whether the effectiveness of those interventions would be examined.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (# peer reviewer(s))</p> <p><input checked="" type="checkbox"/> No (4 # peer reviewer(s))</p>
<i>If no, describe the specific information or clarification that</i>	<p>The plan must be revised to provide a clear description of how CSI schools are designated as Designated Turnaround Schools. This description must include a timeline as well as performance criteria.</p>

<i>an SEA must provide to fully meet this requirement</i>	
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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>The SEA presents a system for allocating tiered supports and resources available in each tier (see Appendix G, p. 103); however, there is no evidence of regular resource allocation reviews, for LEAs with concentrations of CSI and TSI schools, in the plan.</p> <p>The plan describes how state and federal funding will be provided to LEAs and schools identified as CSI and TSI. While it is clear that more resources are provided to the highest-needs districts, it is not clear that the plan addresses more generally whether resources are reviewed periodically to ensure they are allocated equitably and proportionally to the needs of LEAs or schools.</p>
<i>Strengths</i>	The plan describes how state and federal funding will be provided to high-need LEAs and schools identified as CSI and TSI.
<i>Weaknesses</i>	Within the plan submitted, there is no specific articulation on how the state will periodically review LEA resource allocations. The plan would be stronger if such reviews included per-pupil expenditures of Federal, State, and local funds; differences in rates of ineffective, out-of-filed, or inexperienced teachers; access to advanced coursework; access to full day kindergarten and preschool programs; and access to specialized instructional support personnel (school counselors, school social workers, school psychologists, and school librarians).
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The plan must be revised to describe how the SEA will periodically review resource allocations that are made to LEAs with high concentrations of TSI and CSI 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>	<p>Pages 45-51 provide an extensive discussion of the SEA’s approach to technical assistance, with specific focus on CSI and TSI schools as receiving “Tier 2 and 3” supports. Technical assistance resources and support are extensive, utilizing a state system of support model, and are driven by each LEA’s comprehensive needs assessment.</p> <p>The plan describes the SEA’s culture shift from one rooted in compliance to a more balanced approach focused on closing the achievement gap through high-quality service and support.</p> <p>Several of the remaining descriptions of the support being provided were general in nature (e.g., invitations to regional and state professional learning, monthly communiques) without indicating how that technical assistance would improve student outcomes. There was no indication in this section or throughout the document that indicated progress monitoring of the effectiveness of the supports provided, beyond summative assessments using annual student achievement data.</p>
<i>Strengths</i>	<p>The SEA has created a framework that endeavors to create coherence for the support of LEAs and improve supports.</p> <p>This section of the plan provides explicit discussion of how technical assistance is differentiated based on LEA and school needs, and utilizes evidence-based resources and strategies. The plan also engages educator preparation organizations and communities to forge solutions aimed at enhancing the teacher workforce.</p>
<i>Weaknesses</i>	<p>The state describes its Consolidated Funds Pilot, which allow schools more flexibility on how to leverage and use federal funds and empowers LEAs to position federal funds around school improvement goals and priorities. However, the state plan does not describe how the SEA will ensure LEA compliance with federal ‘Supplement, Not Supplant’ requirements during this pilot effort.</p> <p>More description is needed as to how the types of supports will be allocated and how those supports will be progress monitored to determine effectiveness.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 # peer reviewer(s)) <input checked="" type="checkbox"/> No (3 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The plan must include more detail around the role that the more generally stated supports, e.g., direct supports to schools, monthly communiques, are needed to validate that these supports will result in improved student outcomes.</p> <p>The plan must provide an explanation of how technical assistance provided will assist in achieving the state’s interim and long-term goals.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Although the ESSA requirement is specifically about additional LEA support, the plan describes at length how chronically low-performing schools receive additional support. In particular, Georgia House Bill 338 (O.C. G. A. § 20-14-49) requires that, in the case of schools which – after three years of implementing the intensive school improvement plan – are not improving must receive substantial additional support.</p> <p>The SEA delineates a comprehensive list of actions on page 50 (including continued intensive supports, removal of personnel, and third-party operations) that can be taken in the event that schools do not improve after three years of implementing the intensive support plan.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	The plan only addresses school supports and not LEAs, as required by this section.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (1 # peer reviewer(s)) <input checked="" type="checkbox"/> No (3 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	If the state wants to address this indicator it must describe how it will support LEAs. This plan describes how it will support additional improvement in schools, not in LEAs.

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

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

- Does the SEA describe the measures (e.g., data used to calculate the disproportionate rates) that it will use to evaluate and publicly report its progress with respect to how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers?⁴

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA provides LEAs with equity data variables reported at the LEA and school level regarding the effectiveness, experience, and background of teachers. The plan also states that LEAs are required to identify gaps, analyzing district data and evaluating school processes and programs that may have led to these gaps and selecting strategies/activities that will address identified inequities. The plan also discusses how the SEA proposes to continue to elevate LEA best practices, including engaging partners to address teacher equity issues across the state.</p> <p>The SEA plans to share these data publicly, but does not describe the measures used to calculate the disproportionate rates.</p> <p>However, the plan does not provide any data about the extent to which disproportionality is an issue.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>No definition of terms (i.e., ineffective, inexperienced and out-of-field) was evident.</p> <p>The plan does not provide any data describing the extent to which low-income and minority children are disproportionately taught by ineffective, inexperienced, and out-of-field teachers.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The plan must be revised to describe the extent to which low-income and minority children are disproportionately taught by inexperienced, ineffective and out-of-field teachers.</p> <p>The state must describe in its plan how its “online equity dashboard,” or other strategies, evaluate and publicly report progress toward reducing inequities.</p>

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

- Does the SEA describe how it will support LEAs receiving assistance under Title I, Part A to improve school conditions for student learning?

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

- Does the SEA’s description include how it will support LEAs to reduce incidences of bullying and harassment?
- Does the SEA’s description include how it will support LEAs to reduce the overuse of discipline practices that remove students from the classroom?
- Does the SEA’s description include how it will support LEAs to reduce the use of aversive behavioral interventions that compromise student health and safety?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The state annually evaluates and publicly reports school climate star ratings. Accordingly, to the state plan, LEAs and schools that are in significant needs of improving school conditions could potentially utilize Title I, Part A funds to assist in the costs associated with the planned initiatives.</p> <p>The plan describes a list of technical assistance, educational resources and training and professional learning opportunities available to LEAs, teaching professionals, and school personnel to address issues related to bullying and harassment, the overuse of discipline practices that remove students from the classroom and the use of aversive behavioral interventions that compromise student health and safety.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The plan described data analysis around the issue of discipline and suspensions but did not indicate how it would support LEAs and schools to improve school conditions that would reduce suspensions.</p> <p>The plan discusses data collection but does not describe how the data will be used to identify appropriate interventions.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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.7: School Transitions (ESEA 1111(g)(1)(D))

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>On page 54, the SEA notes that each LEA must develop a plan to implement strategies to facilitate effective transitions for students from preschool to elementary school, from elementary to middle school, and especially from middle school to high school, and from high school to postsecondary education. This is specifically addressed in the District Improvement Plan.</p>

	The plan provides extensive information about a range of state initiatives – both ongoing and in the planning stage – to support students through difficult transitions.
<i>Strengths</i>	<p>Multiple career pathways and dual enrollment provide more opportunities for high school students to be prepared to enter the workforce or college. An individual education plan developed at the 8th grade provides a focus and direction for the high school experience.</p> <p>There are many initiatives and resources in place already to support student transitions, and these issues must also be addressed in district improvement plans.</p>
<i>Weaknesses</i>	More detail is needed as to how the resources provided will be utilized in transition activities at the elementary, to middle and high school levels.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The plan meets the minimum statutory requirements by providing an overview of its process and procedures for identifying English learners, including administering a universal Home Language Survey and language proficiency screener within 30 days of enrollment in a school in the state. Georgia’s ESOL Advisory Committee has been established, and includes ESOL experts drawn from higher education, RESAs, Title III consortium member LEAs and rural as well as metropolitan school systems.</p> <p>Applying statewide criteria, the screener determines whether a student meets the definition of an English learner. The SEA will ensure that LEAs continue to follow these long-established entrance procedures.</p>

	<p>Students must demonstrate readiness to exit by meeting the state-established proficiency standard on the state-adopted English language proficiency assessment and local procedures for reclassification must be applied uniformly statewide.</p> <p>The plan addresses how students are assessed with a home language survey within 30 days of enrollment, and are then assessed on a “grades 1-12 WIDA screener” to determine ELP.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>This section of the plan describes how Title III services will be delivered and some of the ways the state will provide support to LEAs and schools with large populations of ELs. The SEA provides a list of general supports to LEAs (e.g., multi-lingual supported instructional technology, professional learning, etc.) but not specific strategies for helping LEAs meet State-designated long-term goals, including measurements of interim progress. While the SEA mentions curriculum and ESOL staff collaboration in content standards development and professional learning related to language and academic content instruction, there are no specifics to indicate how this will occur.</p> <p>The SEA reports progress on all EL students and not just those in the tested grades. The SEA provides a variety of supports for both students and teachers to LEAs to assist them in meeting the state standards. No differentiation in support was indicated; rather, this section indicated the supports generally available with no differentiation in provision based on LEA needs.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The plan does not discuss differentiation of SEA supports based on LEA needs, as indicated by EL assessments.</p> <p>This section is not aligned with the earlier section on ELP long-term goals and</p>

	measures of interim progress. There is no discussion of specific progress measures for ELP students, either interim or long-term, or how Title III services would be designed to support that progress.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 # peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The plan must include a description of differentiated SEA support based on student and LEA needs that ensures EL students meet their interim and long-term goals for EL proficiency as well as content mastery. In addition, the plan must be consistent when describing exit criteria from EL designation versus the definition of EL proficiency provided earlier.

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>The SEA describes its progress monitoring and technical assistance efforts to Title III-funded LEAs. Beginning in 2017, LEAs will each complete a needs assessment that will guide LEAs in determining and addressing the academic needs of each subgroup in their student population. These data-determined needs will inform LEAs' federal program plans and will be a component of each LEA's consolidated application for federal funds.</p> <p>EL progress in English proficiency is monitored annually.</p> <p>Strong focus is placed on improving or expanding LEAs' EL-related professional development, ESOL certification efforts, parent and family engagement, literacy and instructional technology resources, and efforts to identify and serve English learners at the pre-school levels. Technical assistance is provided locally, regionally and at statewide conferences, and via technology through professional learning platforms.</p> <p>The SEA indicates that the progress of each LEA will be monitored through assessing all EL students, not just those in the tested grades. Progress of the EL student subgroup will be measured through annual review of data in the CCRPI.</p>
<i>Strengths</i>	<p>The SEA considers differentiation of support for different contexts, including rural and low-incidence settings, such as the Title III consortium.</p> <p>The plan provides extensive descriptions of how the state provides technical assistance support and resources, including professional development for EL teachers.</p>
<i>Weaknesses</i>	<p>The plan for intervention when EL students fail to make annual progress (as indicated by the CCRPI) through the use of SEA cross-program staff was too</p>

	general to ensure student progress.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 # 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>	