

STATE PLAN
PEER REVIEW CRITERIA
Peer Review Panel Notes Template

STATE: Iowa



U.S. Department of Education

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

A.1: Challenging State Academic Standards and Assessments

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

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

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

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

- If applicable,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>	Not applicable
<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>	

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).

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

A.3.i: Definition

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The State provides a definition of languages other than English spoken by the participating student population that aligns with statutory requirements. The State reports that 5.7% of the student population are English learners. They have identified Spanish as the language spoken by 68% of their students who qualify as English learners. IDE reports that 32% of participating students speak a variety of languages which include Karen (3.8), Arabic (2.8), Bosnian (2.7), Vietnamese (2.6), and Burmese (2.2). The State did not specify if these additional languages appeared in any particular LEA in a concentrated number of students or what grade spans for which these languages apply.</p> <p>Although the State sets a clear threshold for a definition of significant extent of language prevalence and identifies which language meets the threshold (Spanish), SEA did not describe how it considered languages other than English that are spoken by a significant portion of the participating student population in one or more of the State’s LEAs, as well as languages spoken by a significant portion of the participating student population across grade levels.</p>
<i>Strengths</i>	<p>The State provides a clear definition and identifies one language (Spanish) that meets the definition using data from 2015-16.</p>
<i>Weaknesses</i>	<p>The State’s plan could be strengthened by describing if Spanish (or other languages) are spoken by distinct populations of English learners and how the languages are distributed across the state. For example, although no language other than Spanish meets the 4 percent threshold across the state, it is possible that some LEAs have more than 4 percent of their student population speaking a specific language.</p> <p>The State did not specify if languages spoken by those students who did not meet their definition of 4% of participating student populations are concentrated in any particular grade span, any specific area of the state, or in</p>

	any single LEA.
<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 State should provide information regarding whether or not the languages spoken to a significant extent in distinct populations of English learners including English learners who are migratory, English learners who are not born in the United States, and English learners who are Native Americans. The State should clarify that they have 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.

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>	The State notes that current state academic assessments, including those to be used in 2017-18, for the first year of ESSA implementation are not available in languages other than English.
<i>Strengths</i>	The State provides an explanation of why assessments are not available in languages other than English.
<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.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 State notes that current academic assessments are not available in Spanish and that their development may be addressed in the upcoming procurement process to develop statewide academic assessments.

	The need to develop student academic assessments in Spanish is acknowledged; however, it is not clear that the State is fully committed to developing such assessments. For example, it is not clear whether “high priority” within assessment contractor selection criteria means that an assessment in Spanish will be required as a part of the procurement process. p.28-29
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Because Iowa’s academic assessments are not available in languages other than English that are spoken to a significant extent by the participating student population, students who speak languages other than English do not have equal access to Iowa’s academic assessment and therefore are not evaluated relative to their level of proficiency in reading language arts and mathematics.</p> <p>While the request for proposals (RFP) for the new statewide academic assessments includes the provision for a high priority criterion related to development of assessments in languages other than English, it is not clear that there is a SEA commitment to funding the development of these additional assessments.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewer(s)) <input checked="" type="checkbox"/> No (2 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Two reviewers hold the position that the State should offer a clearer explanation of their commitment to develop an assessment in languages other than English that are present to a significant extent in the participating student population.

A.3.iv: Efforts to Develop Assessments

- Does the SEA describe how it will make every effort to develop assessments in, at 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>	The State indicates that while it is a priority, it currently has no plans to

	develop assessments in languages other than English that are present to a significant extent in the participating student population. The State’s lack of clarity regarding the procurement process makes it difficult to see how it is making every effort to develop these assessments.
<i>Strengths</i>	
<i>Weaknesses</i>	On p. 29-30, the SEA states, “This RFP process does not allow consultation across stakeholders to establish the need for assessments other than English (e.g., educators, 30 parents and families of English learners, students, and other stakeholders). However, we have included this as a priority in the RFP evaluation criteria”. It is unclear how this priority will be implemented. The State should clarify their commitment to developing academic assessments in Spanish.
<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 State should clarify if the development assessments in languages other than English that are present to a significant extent in the participating student population will be required in the RFP process. The State should provide specific information with regard to how it has gathered meaningful input on the need for assessments in languages other than English, collected and responded to public comment, and consulted with educators, parents and families of English learners, students, as appropriate, and other stakeholders.

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 State provided a list of all required subgroups.
<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.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>	Not applicable
<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>	The State selected option #2 (peer analysis is not required for this section).
<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: 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 State has selected a minimum N-size of 20 as the minimum number of students that the State determines is necessary to meet requirements under Title I, Part A of the ESEA for accountability purposes.
<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

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>Peer Response</i>
<i>Peer Analysis</i>	Three reviewers held the position that the State provides an explanation of how they arrived at a determination of the selected minimum N-size; however, the State does not justify the statistical soundness of their selection.
<i>Strengths</i>	Plan shows that the state conducted some analysis to consider different n sizes.
<i>Weaknesses</i>	The State’s plan indicates that the results of its analysis show that a minimum N-size of 20 is “relatively or minimally stable”. This description does not indicate statistical soundness.
<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 State’s plan suggests that the State has conducted analysis of the use of a minimum N-size of 20; however, the State should provide a detailed explanation of the methodology used to justify how they selected their minimum N-size as well as how that determination is statistically sound. The State should also provide a definition of the term “minimally stable”. (p. 32)

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 State describes the method used for determining the minimum number of students and how it engaged multiple stakeholders in broad fora to collaborate on final decision making. For example, the State conducted listening sessions, obtained online feedback, and established an ESSA advisory committee. One reviewer held the position that the State does not specifically describe “how” it determined the designated minimum N-size of 20 for accountability purposes and minimum N-size of 10 for reporting purposes. The State notes that statistical analysis was completed, but offers no specifics on the process for determining the statistical soundness of its minimum N-size. However, the State does discuss their extensive effort in collecting stakeholder input after their statistical analysis was complete.
<i>Strengths</i>	The Appendices referenced in this section provide detailed information about stakeholder involvement. It is commendable that IDE mentions the objections to the use of the minimum N-size of 20 for accountability and provides specific responses of stakeholders in their appendices. This transparent approach will support public confidence in the efforts by IDE to reliably report results. Both feedback from stakeholders and empirical data were used. SEA indicates that they reached “general understanding” that the number 20 includes more

	students and schools (than a lower number) and provides statistically valid results).
<i>Weaknesses</i>	One reviewer held the position that the State offers no significant explanation as to “how” they determined the statistical soundness of their decision to utilize a minimum N-size of 20 for accountability.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	One reviewer held the position that the State should provide a more detailed explanation of the methodology used to determine minimum N-size. In addition, the State should provide an explanation of their response to stakeholder feedback.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The State reports that for purposes of reporting (minimum N-size of 10), cell sizes of less than 10 are redacted “based on the denominator” to protect student privacy. The State makes no statement about how they will protect student privacy utilizing the minimum N-size of 10.
<i>Strengths</i>	
<i>Weaknesses</i>	Redacting cells with less than 10 students may not entirely protect students’ privacy if connected cells are left un-redacted. The State’s description does not describe how they will protect student privacy with a minimum N-size of 20 for accountability purposes.
<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 State should provide a detailed description of how it will protect student privacy beyond cell redaction. For example, consider a school with 12 students, 10 of which are not English learners, reporting non-English learner’s in a total N by default identifies that there are 2 English learner students. Peers suggest that the State reviews the Institute for Education Statistics (IES) guidance, “Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information” .

³ See footnote 5 above for further guidance.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The State explains that it will use a minimum N-size of 10 for reporting (in contrast to a minimum N-size 20 for accountability), but does not explain how this minimum N-size will protect student privacy.
<i>Strengths</i>	
<i>Weaknesses</i>	Redacting cells with less than 10 students may not entirely protect students’ privacy, if connected cells are left un-redacted. Additionally, the State proposes to include additional subgroups, without discussing the minimum N-size for those subgroups. (pg. 34)
<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 State should provide a detailed description of how they will protect student privacy. Peers suggest that the State reviews the Institute for Education Statistics (IES) guidance, “Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information” .

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>	The State’s plan provides a detailed table with baseline data and academic achievement long-term goals for all students and subgroups (five-year timeline for all students). The academic achievement long-term goals for student subgroups require twice the percentage of students to become proficient each

	<p>year as for all students (one percent more per year compared to half a percent more per year).</p> <p>The State defends their claim that the academic achievement long-term goals are ambitious because “Iowa’s proficiency has flat-lined in reading and mathematics, regardless of subgroup and grade”. If the State’s academic achievement long-term goals for student subgroups is intended to close proficiency gaps, some groups, such as students with disabilities, require much more improvement than 1 point per year to adequately close proficiency gaps. The State offers no explanation for why reading language arts and mathematics proficiency has “flat-lined”. More clarification around why proficiency has “flat-lined” is needed in order to determine if the State’s academic achievement long-term goals are ambitious.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The annual measurements of interim progress and academic achievement long-term goals as currently set will not close existing academic achievement gaps. Additionally, the annual measurements of interim progress and long-term goals are very modest (p. 35-37), and do not ensure that all students will meet high academic standards.</p> <p>The State’s plan does not discuss how the new state academic assessment that will be developed may affect academic-achievement long-term goals or proficiency levels.</p> <p>More information on how performance has “flat-lined” might provide more insight into why the State believes its academic achievement long-term goals are ambitious (for example, how has performance changed over the last five years?).</p> <p>Table number 19 in Appendix A illustrates that even in five years some student subgroups will not result in even half of the students achieving proficiency (e.g., children with disabilities, English learners, African American students, Native Hawaiian/Islander). The academic achievement long-term goals seem to have been set in a uniform way (.5 or 1.0 increments) without thinking about or explaining the logic of why 7th grade English learners would have a goal of 56.6% proficient in mathematics but in 8th grade only 36.4% would be proficient.</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 State should further explain how its academic achievement long-term goals are ambitious for each student subgroup despite the State’s concern that achievement has “flat-lined”.</p> <p>The State should demonstrate how their measurements of interim progress will lead to the achievement necessary to meet the academic achievement long-term goals and close proficiency gaps between student subgroups.</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>	The State provides a detailed table in Appendix A of the measurements of interim progress.
<i>Strengths</i>	
<i>Weaknesses</i>	The State does not establish measurements of interim progress that will result in closing academic achievement gaps. It is unclear how an annual measurement of interim progress between .5% and 1% improvement will yield improved outcomes for students. See response to A.4.iii.1
<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>	Annual measurements of interim progress and academic achievement long-term goals for student subgroups do not take into account the student progress necessary to close existing achievement gaps. Table 19 in Appendix A illustrates that even in five years some subgroups will not result in even half of the students achieving proficiency (e.g., children with disabilities, English learners, African American students, Native Hawaiian/Islander). The goals seem to have been set in a uniform way (.5 or 1.0 increments) without thinking about or explaining the logic of why 7 th grade English learners would have a goal of 56.6% proficient in mathematics but in 8 th grade only 36.4% would be proficient.
<i>Strengths</i>	
<i>Weaknesses</i>	The annual measurements of interim progress for student subgroups are minimal and do not indicate the progress necessary to close academic achievement gaps.

	See response to A.4.iii.1
<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 State should demonstrate how the academic achievement long-term goals and measurements of interim progress 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.

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>	The State provides graduation rate long-term goals for all students and subgroups along with baseline data and a timeline. The goals are ambitious—especially given the earlier academic achievement long-term goals which leave large portions of student subgroups not proficient in reading language arts and math at 11 th grade. Given the disconnect between the academic achievement long-term goals and graduation rate long-term goals, peers expressed concern about achievability.
<i>Strengths</i>	
<i>Weaknesses</i>	The State notes that on average graduation rates have increased ½ a percentage point each year. For some student subgroups, this rate of increase would not lead to achieving the 95% graduation rate long-term goal.
<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.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 State has established an extended cohort (5-year) graduation rate long-term goal for all students and each student subgroup of 97% which is more rigorous than the 4-year adjusted cohort graduation rate goal of 95%.
<i>Strengths</i>	
<i>Weaknesses</i>	The State could provide a stronger rationale for the 97% target - for example, an analysis suggesting how this corresponds to changes in 5-year cohort graduation rate over time would be helpful. It is also not clear why the State selected 97% as compared to any other goal.
<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>	The measurements of interim progress are provided (Appendix A). The measurement of interim progress vary by student subgroup with some steeper trajectories outlined for student subgroups that have a lower baseline in order for all students to get to the same graduation rate long-term goal in five years.
<i>Strengths</i>	
<i>Weaknesses</i>	It is not clear how supports will be provided to meet the graduation rate long-term goals given differences at baseline among student subgroups.

<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.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>	The State has established graduation rate long-term goals and measurement of interim progress for the 4-year adjusted cohort graduation rate and 5-year adjusted cohort graduation rate that takes into account the improvement necessary for subgroups to reach those goals by making sufficient progress necessary in closing statewide graduation rate gaps, such that the State’s graduation rate long-term goals require greater rates of improvement for student subgroups that graduate from high school at lower rates.
<i>Strengths</i>	
<i>Weaknesses</i>	The State’s plan could provide more information about historical changes in graduation rates for student subgroups to strengthen its rationale for why the goals are both ambitious and achievable.
<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.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>	The State presents English language proficiency long-term goals and measurements of interim progress for the percent of English learners in Iowa who achieve English language proficiency. This does not meet the statutory requirement. IDE indicates the number of years that they will allow for a student to attain English language proficiency as measured by the statewide English language proficiency assessment instead of the percent of students making progress towards achieving English language proficiency within that required number of years.
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The State’s plan does not specify a goal for the “percentage of English learners making progress in achieving English language proficiency”; rather, the plan describes a goal for an increase in the overall percentage of students becoming proficient each year.</p> <p>The goal does not seem derived from a student-level analysis of progress each year towards proficiency. In order to determine if students are making progress the state should establish student-level benchmarks for year-to-year progress in attaining English language proficiency given the students’ baseline level of proficiency.</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>	IDE should describe the annual progress English learners are expected to make toward achieving proficiency within its 5-year timeline (i.e. student level targets), not just in attaining English language proficiency.

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>	The State provides measurements of interim progress, but they refer to the percentages of students becoming proficient each year, not to the progress in attaining English language proficiency.
<i>Strengths</i>	
<i>Weaknesses</i>	IDE does not provide measurements of interim progress toward the long-term goal of all English learners making progress toward attaining English language proficiency.
<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</i>	The State should provide measurements of interim progress toward the long term goal of all English learners making progress toward English language

<i>information or clarification that an SEA must provide to fully meet this requirement</i>	proficiency, and not based solely on attainment of English language proficiency.
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A.4.iv: Indicators (ESEA section 1111(c)(4)(B), 1111(c)(4)(E)(ii))

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

A.4.iv.a: Academic Achievement

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>While the State’s response meets some statutory requirements (e.g., the academic achievement indicator is based on the same assessment as used for the long term goals; all schools are treated consistently; information will be disaggregated for subgroups), some key information is missing such as the role that scale scores play in the academic achievement indicator which is intended to be about proficiency.</p> <p>Additionally, IDE does not mention that they will report the participation of 95% of students and the State does not articulate how the academic achievement indicator relates to the State’s academic achievement long-term goals.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>It is unclear how average scale score growth will be used. For example, yearly targets are not articulated. The State does not address how it intends to close achievement gaps and ensure that all students have equal opportunity to achieve at high standards. Finally, the State indicates that participation has been over 95%, but does not indicate how it will ensure that this trend will continue.</p>

	<p>In addition, the State does not provide information on how the academic achievement indicator will be calculated and how it will result in an academic achievement Indicator that is valid and reliable. Clarification of method of calculations is needed.</p> <p>There is no description of how scale scores and proficiency levels will be combined within the academic achievement indicator. Moreover, proficiency should be a stand-alone indicator.</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 State should provide a stand-alone indicator of proficiency. The State should provide a clear and detailed explanation of how the academic achievement indicator will be calculated. The State should provide information that will yield a determination of the validity and reliability of the academic achievement indicator, not just the assessment. The State should also provide information on how they will ensure that 95% of students are being measured.</p>

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>IDE provides an insufficient description of its Other Academic Indicator used in its statewide accountability system. The State titles this indicator as the “Student Growth Percentile” growth model.</p> <p>According to statute, this indicator is for elementary and secondary schools that are not high schools; however, the SEA has applied the student growth percentile to all schools and included it as an indicator for high schools with considerably more weight than the academic achievement indicator. In terms of the elementary/middle schools, the SEA indicates that the other academic</p>

	<p>indicator will be applied consistently across schools. However, the state does not describe how SGPs will be formed to constitute an indicator. For example how will state summarize across grades, subjects, and years and what level of performance is expected.</p> <p>The State provides no description of how this growth model is developed or calculated. It is not possible to determine if this indicator could allow for meaningful differentiation between schools or if it can be disaggregated for each student subgroup without knowing how the indicator is calculated.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>IDE provides no description of how the student growth percentiles would be calculated for elementary and middle schools. In other words, IDE does not illustrate how the scores will be transformed to constitute an indicator. No information is provided that describes how data will be summarized across subjects, grades, and years and takes into account the performance of 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>IDE should clarify to which grades this indicator applies (note: a growth indicator for high schools does not meet this requirement).</p> <p>IDE should also provide a detailed description of how the student growth percentiles are calculated for this indicator. For example IDE should provide information on which student growth percentile indicates strong performance and which student growth percentile indicates poor performance.</p> <p>IDE should provide information on how they summarize across subjects, grades and years and how they will disaggregate results for subgroups. SGPs are usually calculated at the student level. It is not clear how student-level results will be aggregated to the school level.</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>IDE describes its graduation rate indicator for both the 4-year adjusted cohort graduation rate and the 5-year extended adjusted cohort graduation rate that will be applied consistently to all schools and to disaggregate by student subgroup; however, the SEA provides no examples of how the calculations are determined. IDE does not indicate if they intend to lag adjusted cohort graduation rate data. It is unclear if the 5-year extended adjusted cohort graduation rate is to be combined with the 4-year adjusted cohort graduation rate, and if so, there is no explanation of how these will be combined.</p> <p>IDE mentions that this indicator is for students receiving a “regular” diploma. However, they do not mention if students with the most significant cognitive disabilities are included in this indicator or if those students receive a different type of diploma. It appears that the indicator can be disaggregated for each subgroup of students except for students with the most significant cognitive disorder; however, IDE should provide additional information to confirm this assumption.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	It is not clear how 4-year adjusted cohort graduation rate and the 5-year extended adjusted cohort graduation rate will be combined. The State’s plan could also be strengthened by adding information about students with the most significant cognitive disabilities will be included in this indicator.
<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>	IDE should provide a detailed description of how the 4-year adjusted cohort graduation rate and the 5-year extended adjusted cohort graduation rate will be combined. IDE should describe how the graduation rate indicator will be calculated within its accountability system. In addition, IDE should provide information on the methods used to account for the adjusted graduation rates of students with the most significant cognitive disabilities.

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 proposed to use student growth percentiles based on the ELPA21 measure, but there is not further information about how it will be calculated. IDE provides scant information about its Progress in Achieving English Language Proficiency indicator. IDE states that the indicator will be used in all schools throughout the state; however, no methodology is included nor an indication on how this indicator will be based on the long-term goal of increasing the rate of student progress toward attaining English language proficiency. The IDE provides an incomplete definition of English language proficiency based on the State’s English language proficiency assessment. IDE provides no timeline for progress in achieving English language proficiency; instead IDE provides a timeline solely based on attainment of English language proficiency.
<i>Strengths</i>	
<i>Weaknesses</i>	<p>More description of the student growth percentile methodology as proposed for the English language proficiency indicator and how it is valid and reliable could be provided. It is not clear how the indicator will be used in the accountability system.</p> <p>The SEA does not provide a definition of English language proficiency. The exact purpose and use of student growth percentiles is unclear throughout the plan.</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>IDE should describe how the student growth percentiles are used in the accountability system. For example what level of progress represents strong performance?</p> <p>IDE should provide evidence that the indicator is valid and reliable and should describe how the English language proficiency indicator aligns with the English language proficiency long-term goals.</p> <p>IDE should provide clearer language regarding the state-determined definition of English language proficiency in its State plan.</p>

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>IDE fulfilled the requirement to supply at least one school quality or student success indicator, the Conditions of Learning survey, which allows the State to implement the full accountability system.</p> <p>The SEA describes two primary measures that it plans to utilize as measures of school quality or student success. The first measure, the Conditions for Learning survey, examines safety, engagement and environment. The second measure seeks to measure post-secondary readiness and success, but is not yet completed. Therefore not enough information is provided about the second indicator in order to be able to utilize it in the current accountability system.</p>
<i>Strengths</i>	<p>The State's Conditions of Learning survey seems to be very well-developed and a collaborative effort with public health institutions in the state. State clearly indicates to which grades the survey applies.</p>
<i>Weaknesses</i>	<p>All reviewers held the position that the details of the distribution of weights for both measures (i.e. the Conditions for Learning survey and the Post-secondary readiness and success measure) were not sufficiently established and no information is provided concerning the use of these indicators for both reporting and accountability.</p> <p>Additionally, all reviewers note that many details have yet to be established for the Post-secondary readiness and success measure; therefore, it is not possible to determine that this indicator is reliable. Despite the lack of details for the Post-secondary readiness measure, IDE fulfilled the requirement to supply at least one school quality or student success indicator, the Conditions of Learning survey, which allows the State to implement the full accountability system.</p> <p>One reviewer believes that the technical data provided regarding the Conditions for Learning survey indicated that some factors were not robust; however, the survey met the minimum peer review criteria.</p> <p>One other reviewer believes that the Conditions for Learning survey cannot lead to meaningful differentiation between schools if the respondents are anonymous and therefore believes IDE did not meet this requirement.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s))
<i>If no, describe the</i>	<p>One reviewer holds the position that IDE should clarify the ability to</p>

<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	disaggregate the results of the Conditions of Learning Survey by student subgroup. For instance, if the survey is anonymous and the demographics on page 209 represent the school population rather than the respondents then the results would not represent disaggregation by subgroup.
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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 State’s system of annual meaningful differentiation is organized within a “decision tree” model. The system of annual meaningful differentiation is based on all indicators in the state’s accountability system. The State has also indicated that the system of annual meaningful differentiation will apply to both all students and all subgroups of students in the state’s accountability system. However, the State has not provided any information on the manner in which this variable assignment of weights during the first three years of implementation of each indicator will affect the State’s system of annual meaningful differentiation. Additionally, the inclusion of a weight of 10 for “Participation” in the State’s system of annual meaningful differentiation appears to be over weighted given that the State has indicated that it historically achieves a 95% participation rate.
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Examples of how the five indicators are calculated within the State’s accountability system would be helpful to understand the State’s system of annual meaningful differentiation.</p> <p>The plan lacks definitive information concerning the use of the school quality or student success indicators for both reporting and accountability and how the application of variable weights over a three-year period will affect the differentiation and identification 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>	IDE should provide a clear description of the performance levels for each indicator and how the performance on the indicators combines to provide meaningful differentiation of schools. (See comments on the individual indicators above). IDE should also assure annual meaningful differentiation of schools for purposes of accountability rather than once every three years.

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 State provides the weight of each indicator; however, it is not clear how actual data for each indicator is calculated using the state’s weighting system and how a final rating or score is assigned. Because it is unclear how each of the five indicators is calculated, it is difficult to understand the aggregate weight of relevant indicators. For example, without understanding the performance level thresholds for each indicator, it is not possible to know the effective weight of the indicators.</p> <p>In addition, when considering individual weights, there are other concerns. Among these are the re-distribution of weights due to low N-sizes; overweighting of “participation”; prioritizing growth over proficiency. The State indicates that in situations in which a particular indicator cannot be calculated due to a limited amount of students, then the points for that indicator would be distributed evenly among all of the indicators with the exception of the Participation indicator which will remain constant. The Academic Achievement, Other Academic Achievement, Graduation Rate, and Progress in Achieving English Language Proficiency each receive substantial weight individually. However, by year three of reporting, in the High School, the Academic Achievement Indicator only receives 15% weight, which is far lower than the student growth indicator, which is 34%.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>It would appear that the two primary indicators for differentiating between schools, which would also play an important role in the identification of schools, should present a better balance of the weights on the indicators. IDE reports that Participation rates have been stable at a minimum of 95%. If the Participation rate was removed or given a far lower rate, due to the high level of participation each year then those 10 points could be awarded to the Academic Achievement category. Therefore, there would be a greater balance of the weights for the two most important indicators. All indicators other than School Quality/Student Success receive, in the aggregate, much greater weight than the School Quality/Student Success Indicator.</p> <p>On p. 54, the SEA states that if an indicator cannot be calculated due to low N-size, “that the weighting will be adjusted by distributing the difference proportionately across the remaining indicators with the exception of participation which will remain constant at a weight of 10%”. Potentially, redistribution could change the intended weight of the academic indicator. The SEA does not describe what would happen if a school had too few students for</p>

	<p>more than one reporting category (achievement and growth, for example).</p> <p>It is difficult to discern the impact of the variable weights on the State’s annual meaningful differentiation as well as identification of low performing 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>	<p>IDE must clarify how each indicator is calculated and combined to determine an overall score or rating within its accountability system. Without these changes, a determination cannot be made regarding adherence to the statutory requirements.</p>

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 State’s approach will assign an accountability determination based on the school to which the original students are sent (i.e. a P-2 school will get the rating of the school with tested grades to which its students go).
<i>Strengths</i>	
<i>Weaknesses</i>	The State’s plan would be strengthened if it clarified that the only schools for which accountability determinations cannot be made using its indicators are P-2 schools. The State’s plan would also be strengthened if the State considered measures specific to the schools themselves rather than deriving them from other 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: 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 plans to first identify low-performing schools in 2018-2019. The SEA identification process is largely consistent with statutory requirements; however, the identification should take place on an annual basis and should apply to schools receiving Title I, Part A funds.
<i>Strengths</i>	
<i>Weaknesses</i>	The SEA’s plan could be clarified with examples of how its methodology will achieve the goal of identifying the lowest 5% of Title 1 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>	IDE should clarify that they will identify schools for accountability annually. IDE should also clarify that this identification applies to schools receiving Title I, Part A funds rather than stating that it applies to “all schools”.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	IDE states that they will first identify low graduation rate comprehensive support and improvement schools in the 2018-2019 school years. The SEA’s description suggests that they believe that this identification can only come from those high schools that are receiving Title I, Part A funds, not from among all high schools. Also IDE states that they will make this determination for accountability every three years instead of annually.
<i>Strengths</i>	
<i>Weaknesses</i>	The SEA’s plan could be clarified with examples of how its methodology will achieve the goal of identifying high schools failing to graduate one-third or more of their students, particularly with respect to the use of a 4-year and 5-year adjusted cohort graduation rates.
<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>	IDE should clarify that this identification applies to all public high schools and that the identification will occur annually. IDE should also clarify how the 4-year and 5-year adjusted cohort graduation rates will be combined in the calculation.
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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 SEA identifies that schools not meeting the targeted support and improvement exit criteria in 3 years will be identified as comprehensive support and improvement schools.
<i>Strengths</i>	
<i>Weaknesses</i>	This approach appears to enable schools that make minimal progress to not be identified after 3 years. The amount of student and school progress required is not well-described.
<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 will begin identifying comprehensive support and improvement schools in 2018-19 school year and will re-identify every three years.
<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>	
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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’s plan defines “consistently underperforming” as one with a “zero-to-negative” growth trajectory in the SEA’s ESSA accountability index for three years. IDE reports that they will apply their accountability system annually for reporting purposes and every three years for accountability purposes. Therefore, it is unclear if the SEA plans to identify these schools annually.</p> <p>The SEA articulates a process for identifying consistently underperforming groups that can include identification of multiple underperforming groups.</p> <p>Without clear information about individual indicators, it is difficult to assess the extent to which the state’s system for annual meaningful differentiation adequately reflects requirements.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>It is not clear what is meant by a “zero-to-negative” growth trajectory. Examples and a more detailed explanation would be useful.</p> <p>The method of school identification described only identifies groups failing to make growth and does not address achievement gaps.</p> <p>Also, the identification of schools that are in need of Targeted Support and Intervention appears to take place at the same time that identification of schools for Comprehensive Intervention and Support. This appears problematic because the results of schools that are identified for comprehensive support and improvement are needed in order to determine which schools are identified with “consistently underperforming 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</i>	IDE should clarify that it will identify targeted support and improvement schools annually once identification begins.

<i>or clarification that an SEA must provide to fully meet this requirement</i>	IDE should also describe the details of the ESSA Accountability Index and how calculations will be made in order to identify TSI schools.
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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>	IDE reports that their identification of additional targeted schools will take place every three years for accountability purposes and once a year for reporting purposes. Therefore it is not clear how often IDE plans to identify these schools. IDE states that these schools will be identified from those schools receiving Title I, Part A funds and therefore will not identify students from the “all schools” category. IDE states that they will first identify these schools in 2018-2019, which is also the first year that they will identify schools for Comprehensive Support and Improvement. It is difficult to determine how they will establish the “consistently underperforming” element of this designation if they are doing it based on 2018 data as is indicated in the IDE plan.
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Examples could help strengthen and clarify the plan to identify additional targeted support schools. Plan should clarify the frequency of identification (Appendix H suggests this is annual).</p> <p>A three year identification cycle can mean that schools are persistently struggling for two years prior to identification.</p> <p>The SEA’s identification process seems to apply only to schools receiving Title I, Part A funds.</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</i>	IDE must clarify that they will annual identify additional targeted support schools from among all schools (not only schools receiving Title I, Part A funds), once identification has begun.

<i>meet this requirement</i>	
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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>	Not applicable
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA has created a binary measure of participation in assessments. Schools either meet or do not meet the 95% participation rate.
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The SEA does not specify whether or not the data will be disaggregated by student subgroups and whether or not there will be consequences for schools in which certain student subgroups (students with disabilities, for example) consistently fail to meet the participation threshold.</p> <p>IDE explains how it factors in the requirement for 95% participation of all students and in each student subgroup in statewide reading/language arts and mathematics assessments into its accountability system. IDE reports that this rating is placed within their Accountability Index and is rated in a binary fashion. If they meet the requirement, then the school is awarded 10 points. However, it is unclear if the 10 points will be awarded for the all students category and another 10 points for the student subgroup category or if these points are distributed for different participation rates. IDE does not explain how it will differentiate its approach based on such factors as the number of</p>

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA’s plan describes how schools must make progress across three years of support based on their action plans. IDE does not relate these criteria nor does it align the criteria with its long term goals or measurements of interim progress. As the criteria are now written by IDE, they do not ensure continued progress to improve student academic achievement and school success in the State. In other words, there is nothing in this criteria and school support where the exit criteria improves student outcomes and ensures that a school that exits no longer meets the criteria under which the school is identified.
<i>Strengths</i>	A multi-faceted set of requirements for exit criteria that includes the concept of consistent improvement in priority areas of need in an action plan; identification of relevant evidence-based strategies; and effective implementation of identified strategies with fidelity. The SEA requires the school action plan to be based on the accountability indicators, the needs assessment and result of resource allocation.
<i>Weaknesses</i>	Since the exit criteria are school-specific, it is difficult to ascertain how well they align to improving academic achievement and school success in the State.

	There does not appear to be a significant focus on student achievement targets, and the standard for “consistent improvement” is low (p. 59). This does not support children in failing schools that require stronger supports.
<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>	IDE should provide additional and detailed information regarding how their proposed exit criteria, their definition of continued progress, and their timeline for identification of schools relate to all long-term goals. IDE should also articulate how schools meeting positive growth criteria will yield attainment of the State’s long-term academic achievement goals.

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 SEA has put forward exit criteria for targeted support and improvement schools; however, how these are aligned with overall performance targets is unclear. They include the minimum number of years required, but it is not clear how exit criteria ensure continued progress in student achievement. One reviewer holds the position that the number of years was not made clear.</p> <p>IDE does not relate this criteria nor does it align the criteria with its academic achievement long term goals or measurements of interim progress that takes into account the improvement necessary to close statewide proficiency and graduation rate gaps. Even if a school makes no improvement in academic achievement or improvement toward meeting the state’s long-term goals or in closing proficiency or graduation rate gaps, the identification of the school as a targeted support and improvement school is removed. It is difficult to understand how this aides the students in failing schools to be able to reach proficiency and to be prepared for college and career. Further details and explanations are required to ensure that exit criteria are created that ensures continued progress for the school and that prior to lifting any identification of the school, the school no longer meets the criteria under which the school is identified.</p> <p>See also comments as for A.4.viii.a</p>
<i>Strengths</i>	

<i>Weaknesses</i>	<p>IDE has written exit criteria that do not align the State with meeting all long-term goals and measurements of interim progress such that the school is sufficiently closing proficiency and graduation rate gaps. This does not support children in failing schools that require stronger supports.</p> <p>See also comments as for A.4.viii.a</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 an SEA must provide to fully meet this requirement</i>	<p>IDE should articulate how these exit criteria align with each of the state's long-term goals. Specifically, meeting the performance targets towards meeting the SEA's long-term goals not just the attainment of any degree of positive growth.</p> <p>IDE needs to assure that 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).</p> <p>One reviewer held the position that IDE should more clearly define the number of years within which schools are expected to meet the criteria.</p>

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

- 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>The SEA requires implementation of a state-approved strategy (selected from a Department-developed list) and schools must use coaching and professional development resources toward the implementation of those strategies.</p> <p>One reviewer holds the position that IDE does not address any strategies for changes in school staffing and budgeting, the school day length, or year length for academic instruction.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Examples of potential strategies could strengthen the plan. Additionally, IDE's strategies for more rigorous interventions do not seem to focus on the need to intervene in a chronically failing school with additional and more rigorous strategies that will result in a positive trajectory and actual improvement in academic achievement. For example, PLC's could focus on the use of data combined with PD in meeting the needs of students. This would allow for the implementation of strong accountability within the building.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (3 peer reviewer(s))</p> <p><input checked="" type="checkbox"/> No (1 peer reviewer(s))</p>

<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	One peer reviewer holds the position that more rigorous interventions need to be developed by the SEA to support schools who fail to meet exit criteria.
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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’s plan describes how the resource allocation review process will be used in the “planning year”; however, it is not clear if this refers to the first year of ESSA implementation or to any year in which a school is to be identified for comprehensive support. There is also no mention of targeted support and improvement schools within the SEA’s plan for resource allocation review.</p> <p>The SEA’s plan for resource allocation review is a collaborative effort between the department and the LEA leadership and will be conducted by a universal protocol that is common to all schools. It will focus on the equitable distribution of programs and personnel.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The SEA should clarify how often the resource allocation review will take place.</p> <p>The SEA’s process for resource allocation review is not yet fully articulated. Also, remedies will be implemented “to the extent practicable” (pg. 63.) It is unclear whether this will yield tangible results.</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>	IDE should clarify how often the resource allocation review will take place.

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?
- Are 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>	The SEA is explicit about the process for engaging with districts in an intense and ongoing way to assure that districts have a well-thought out plan based on solid needs review; stay on top of implementation; and conduct data-based reviews. P.63-65
<i>Strengths</i>	<p>The SEA plans to provide a variety of online and in-person supports for schools as well as ongoing data analysis and coaching during implementation of improvement plans.</p> <p>The SEA details how planning is to occur by a district leadership team, including a systematic review of data and indicators along with a needs assessment. The SEA will offer regional learning opportunities in the areas of priority evidence-based strategies. LEAs will receive support to develop implementation plans.</p> <p>Working with the AEA, the Department will identify evidence-based strategies; the AEA will check on the research base for other strategies that may have been identified in implementation/action plans. SEA will share the evidence-based strategy information with all districts.</p>
<i>Weaknesses</i>	<p>More information about how AEAs will review and verify the evidence behind interventions could strengthen the SEA's plan.</p> <p>Much of the first, front-line technical assistance is delivered remotely. IDE's plan for technical assistance could include more on-site and problem specific intervention. IDE school improvement staff could be more actively involved on site to assist school personnel as they learn to affect real change in the school that supports student academic achievement.</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.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>	Not applicable
<i>Strengths</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The State’s plan states that low-income and minority students are not served at disproportionate rates by ineffective, inexperienced, or out-of-field teachers; yet, the State does not provide data or describe its measures to support this claim. This information may be included in the State’s equity plan, which is referenced but from which no additional information is provided.
<i>Strengths</i>	
<i>Weaknesses</i>	The State does not explain how students are not disproportionately served by ineffective, inexperienced, or out-of-field teachers, or what specific measures are used.
<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 State should provide data to support their claim regarding “no disproportionality”.

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

<i>provide to fully meet this requirement</i>	
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A.6: School Conditions (ESEA Section 1111(g)(1)(C))

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The State provides descriptions of how it supports LEAs in the reduction of bullying, implementation of PBIS, and ensuring health and safety of students. The State describes state laws related to bullying, discipline practices and has developed extensive work on Conditions for Learning as detailed in the Appendix G along with related toolkits and professional development for student health and safety.
<i>Strengths</i>	<p>The State is engaged in the implementation of PBIS and the Conditions of Learning Survey and offers an extensive library of toolkits to provide additional supports.</p> <p>The stakeholder comments and related information about the Conditions for Learning survey demonstrate high expectations in the State for identifying and responding to the issues of students, parents, and teachers with respect to safety, health, respect, engagement. The State has implemented PBIS network from early childhood through secondary. PBIS data review includes data on bullying, harassment, suspension, expulsion, etc.</p>
<i>Weaknesses</i>	The State’s plan could be more specific about how and how much funding will be used to support conditions for learning. The State could also provide evidence of the effectiveness of these supports.
<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>IDE presents a detailed description of the many programs, policies, trainings and support systems it employs to support Title I schools. IDE also identifies not only the work at IDE but also those of the Governor and of partner industries and other stakeholders to develop opportunities for all of Iowa’s children. IDE also discusses the programs and opportunities it offers LEA’s in assisting students with transitions from Early Childhood programs to elementary school and from middle school into high school.</p> <p>The SEA has identified strategies that are necessary for successful transition and works especially with Title I middle and high schools on those strategies. In addition, in this section, the SEA has described all the various types of efforts made to support students including standards, teacher supports, early childhood programs and collaborations, etc.</p>
<i>Strengths</i>	<p>The SEA takes a comprehensive approach, including supports related to conditions for learning, academics, and other areas.</p> <p>IDE is working to continue to develop a system of support for Title I schools and for effective transitions into elementary school, into high school and in promoting graduation and prevention of dropouts.</p> <p>The SEA has developed professional development, support documents, resource toolkits that are evidence-based to prevent dropouts. The MTSS is also seen as a critical part of support for transition—identifying a “continuum of intensities” to support all students.</p>
<i>Weaknesses</i>	<p>The SEA’s plan could focus more specifically on how programs relate to dropout prevention (a few are specific, but many are general).</p> <p>It would have been helpful to be able to review data that illustrates the results of IDE’s work in these areas.</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>	

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>	The SEA states that students will be assessed within 30 days of enrollment. The English learner leadership team has broad-based representation and has significant input from across the state.
<i>Strengths</i>	The SEA utilizes standardized assessments and procedures from the ELPA21 group. IDE states clear entrance and exit criteria for English learners. The use of a statewide English learner leadership team to implement standardized entrance and exit procedures is a strength. This team includes representatives from the largest LEAs (which have the English learner populations) and AEA.
<i>Weaknesses</i>	The SEA’s plan could provide more detail on the composition of the English learner leadership team and how it represents geographic diversity within the state.
<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>	The SEA’s plan provides a broad overview of supports for LEAs, but it is not clear how these relate specifically to goals for English language proficiency.
<i>Strengths</i>	
<i>Weaknesses</i>	English learners often require additional approaches and supports that are not articulated here. The SEA does not describe any specific supports for these students. IDE does not appear to have a specific strategy for assisting students in

	attaining English language proficiency such as direct instruction, progress monitoring and benchmarking results as well as reporting out the progress of students as they go through the process of attaining English language proficiency. IDE does not have a specific strategy for assisting English learners in accessing classroom instruction in their native language while the student is attaining proficiency.
<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>	IDE should articulate specific supports it will utilize and how it will assist LEA's in meeting English Language Proficiency. The strategies listed are generic and not specific to English learners.

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>	The SEA describes its overall monitoring process through its general monitoring plan. It specifies that if districts do not meet expectations by the end of three years, they will be required to implement state-approved strategies.
<i>Strengths</i>	
<i>Weaknesses</i>	The SEA's plan could be strengthened by providing examples of the types of state approved strategies. The SEA provides language related to compliance and monitoring, but does not thoroughly articulate technical assistance. IDE states that after the third year of implementation of an LEA plan under Title III, Part A, if the LEA is still ineffective in achieving its goals that the LEA will have to "implement a state approved strategy that aligns with district and building needs, which will include but not limited to practices across each of five domains of Language, Culture, Instruction, Assessment and Professionalism". No other details were offered.
<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</i>	

*meet this
requirement*