

STATE PLAN PEER REVIEW CRITERIA Peer Review Notes Template

STATE: Idaho



U.S. Department of Education

Background

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

Role of the Peer Reviewers

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

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

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

How to Use This Document

The peer review criteria are intended to: 1) support States as they develop their consolidated State plans, and 2) inform peer reviewer panels as they evaluate each consolidated State plan. This document outlines the required elements that an SEA must address in its State plan in order to fully meet the applicable statutory and regulatory requirements. If an SEA has provided insufficient information for peer reviewers to determine whether any requirement is fully addressed, peer reviewers should indicate that the SEA has not fully addressed that requirement and identify what

additional information or clarification may be needed. Note that responses to some elements are required only if the specific circumstances addressed in the question are applicable to the SEA submitting the consolidated State plan (*e.g.*, if the SEA establishes an extended-year adjusted cohort graduation rate in addition to a four-year adjusted cohort graduation rate in item A.4.iii.b.2 below). For these particular questions, if the circumstances addressed in the question do not apply to the SEA, the SEA is not required to answer the question in order to fully address the statutory and regulatory requirements.

Instructions

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

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

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

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

A.1: Challenging State Academic Standards and Assessments

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	Not applicable.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input type="checkbox"/> No (0 peer reviewers) <input checked="" type="checkbox"/> N/A (4 peer reviewers)

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

<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	
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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>Idaho’s definition for languages other than English that are present to a significant extent in the participating student population requires one of two conditions to be met (p. 9): (1) a language spoken by 5% or more of all students, or (2) 20% or more of English Learners. By this standard, the state accurately identifies Spanish as “the most predominant language [other than English that is present to a significant extent in the participating student population], as Spanish represents nearly 80% of the state’s English Language learners.</p> <p>However, the data provided by Idaho indicates that Spanish represents “just under 7% of our students in tested grade levels,” which does not necessarily align with the first condition in the state’s definition, that refers to a language spoken by 5% or more of all students. The students in tested grades represents a subset of all students. Idaho’s plan would benefit from greater consistency regarding the denominator used to meet the state’s criteria (either using students in test grades or all students in the state).</p> <p>The definition is strong; however, the plan lacks a descriptive methodology by which the definition allows for</p>

	comprehensive analysis and consideration of all groups and subgroups for determining languages other than English that are present to a significant extent in the participating student population. The state provides a snapshot of data to support its definition. Page 9.
<i>Strengths</i>	ID bases its definition on an analysis of EL student data within the state.
<i>Weaknesses</i>	To provide definitive evidence that Spanish is the only language beyond English present to a significant extent—based on the state’s definition--the state should also provide the total number of EL students in the state, and percentages represented by each of the top five languages spoken.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Align methodology for identifying specific languages other than English that are present to a significant extent with its description provided in Table 1 on Page 9 (i.e., indicate percentage each language represents of total student population rather than tested student population). In determining which languages are present to a significant extent in the participating student population, describe how ID 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. Describe how ID 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>	ID provides native language versions of its science and mathematics assessments for speakers of Spanish, the only language that meets the state’s definition of being significantly present. However, in responding to this question ID does not specify for which grades the Spanish language assessments are available. Page 9.
<i>Strengths</i>	The state provides Spanish language versions of its science and mathematics assessments.
<i>Weaknesses</i>	It is unclear from the state’s response whether Spanish language versions of the science and mathematics assessments are available for each tested grade or just certain grades. This information is necessary for a complete assessment of the state’s response.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)

<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Specify the grades for which the Spanish language assessments are available.
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A.3.iii: Assessments not Available and Needed

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	Spanish is the only language meeting the state’s definition of being present to a significant extent in the participating student population. The state’s rationale for the unavailability of a Spanish translation of the English language arts assessment is provided in section A.3.ii, where the state indicates that no ELA assessments are available in Spanish as the English language is a critical component of the statewide ELA assessment. ID should consider, however, whether a translated version of an assessment may be possible for items that measure reading comprehension. Idaho’s plan would benefit from greater discussion and stakeholder input on this issue. Page 9.
<i>Strengths</i>	The plan indicates that no other assessments are needed “at this time” (p.9), suggesting a formative approach and consideration for change pending future shifts in population data.
<i>Weaknesses</i>	The state’s plan describes Spanish as a language spoken by a “large enough percentage of the statewide student population” (p. 9), however the percentage should be calculated from the participating student population.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.3.iv: Efforts to Develop Assessments

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	Not applicable.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input type="checkbox"/> No (0 peer reviewers) <input checked="" type="checkbox"/> N/A (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	ID indicates that it will include the following groups in its federal reporting and comprehensive and targeted support identifications: Economically disadvantaged students (students with free or reduced-price lunch status); English learners (those who have not yet tested as English proficient); Minority students, (which include American Indian or Alaskan Native, Asian, Black or African American, Native Hawaiian or Pacific Islander, White, Hispanic or Latino); Students with disabilities. It is unclear from ID's response exactly how it will include subgroups in its accountability system (e.g., what does the state mean by "federal reporting" on page 10, misalignment between the description of EL student subgroup within this section and the state's intention to include former ELs in group for up to four years referenced in A.4.i.d (also on page 10). , why white students are included in the "minority students" category, and whether ID will report separately on and/or use results from each subgroup of students listed in the minority students category that meets ID's minimum group size. Additionally, Idaho's plan would benefit from a clarification that all students with disabilities are included in the state accountability system and that based on state-specific criteria outlined in the Idaho Special Education Manual no students will be excluded. Page 10.
<i>Strengths</i>	
<i>Weaknesses</i>	ID's response lacks specificity. It is unclear from the state's response how it will use subgroup results in its accountability system, and specifically which categories of students will be included in school-level accountability determinations.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Clarify how and which student subgroups will be used for (a) annual meaningful differentiations, (b) comprehensive and targeted school determinations, and (c) report cards. Rather than grouping "minority students" together in a single description, list all individual racial/ethnic subgroups the state plans to use. Modify description of EL student subgroup within this section to align with the state's intention to include former ELs in group for up to four years (page 10), consistent with the state's selected option referenced in A.4.i.d (also on page 10).

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

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	Not applicable. State selected exception under ESEA section 1111(b)(3)(A)(i)—exempting 1 st year EL from initial administration of state’s language arts/reading test, and excluding results of 1 st year ELs mathematics and ELP assessments from accountability determinations.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input type="checkbox"/> No (0 peer reviewers) <input checked="" type="checkbox"/> N/A (4 peer reviewers)
<i>If no, describe the specific information or clarification that an</i>	

<i>SEA must provide to fully meet this requirement</i>	
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A.4.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>	<p>Idaho has proposed an n-size of 10 for the “all students group” in the graduation rate indicator, but appears to propose an n-size of 20 for other “all students” accountability indicators. Idaho’s rationale states that the graduation rate measures one cohort of students and not multiple grade spans used in the academic achievement measures. In collaboration with its Data Management Council (DMC), Idaho reduced its reporting minimum n size from 10 to 5 and proposed a corresponding decrease in its accountability n-size. Based on further data analysis of rural and remote districts, Idaho selected an n-size of 10 for subgroups – allowing the state to capture results from more subgroups and ensuring interventions are provided for subgroups of students who are under-performing. However, it is unclear how an n-size of 10 could be considered valid and reliable at the subgroup level, but insufficient for the achievement results for “all students”.</p> <p>The state’s approach does not meet the specific requirements of this section – requiring the same state-determined number be used for all students and each subgroup.</p>
<i>Strengths</i>	Through its n-size selections and response to this item, ID demonstrates a strong interest in holding as many schools as it can accountable for the results of their students, including subgroups. The state’s response also indicates that has analyzed student data and conferred with stakeholders regarding n-size determinations.
<i>Weaknesses</i>	ID has not met the requirement that the minimum number of students be the same State-determined number for all students and for each subgroup of students in the State (<i>i.e.</i> , economically disadvantaged students, students from each major racial and ethnic group, children with disabilities, and English learners) for accountability purposes.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)

<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Per ESEA Sec. 1111(c)(3)(A), the minimum number of students must be the same State-determined number for all students and for each subgroup of students for accountability purposes, however the SEA proposes an n-size for the All Students subgroup that is twice the N size of that of the major racial and ethnic groups. The SEA should reconsider its selections for n-size and establish a uniform n-size across accountability groups.
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A.4.ii.b: Statistical Soundness of Minimum N-Size (ESEA section 1111(c)(3)(A)(i))

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	ID’s use of 20 students as a minimum n-size for the all students group in a school allows the state to hold more schools accountable than higher n-sizes, and given the state’s apparent intent to require schools to meet the minimum n-size for all indicators, may meet the “statistical soundness” test. ID also proposes to use an n-size of 10 for subgroup accountability determinations, as well as for graduation rate accountability determinations, with the stated aim of holding as many schools as possible for their students’ results. It appears that ID does not plan to use multi-year averaging, confidence intervals, or other approaches that would help to mitigate the variability in year-to-year results that is likely to occur with the use of such small n-sizes; thus, the state’s annual meaningful differentiations and identification of targeted support and low graduation rate schools are, in certain cases, likely to be influenced by the results of very small numbers of students and as a result some findings may not represent meaningful change from prior years. Additionally, the plan lacks a description of the “data points” (p. 12) referenced for use in creating a statistically sound identification system” (p. 12). Pages 12-13.
<i>Strengths</i>	ID has selected n-sizes that are intended to include as many schools and student groups as possible in its accountability system.

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

<i>Weaknesses</i>	<p>ID justifies its selection of an n-size of 10 for subgroups by describing how many more schools the state will be able to hold accountable by using 10 students. The state does not describe any analyses that it performed to determine that a group size of 10 will typically produce valid and reliable results, nor does the state describe any approaches it plans to implement (e.g., multi-year averaging, confidence intervals) to help mitigate variable year-to-year results.</p> <p>Though the state’s narrative (p.12) indicated that analyses were performed using N sizes of 25, 20 and 15 – with little variance between them – the results for N of 15 were not provided. This may have been helpful in determining why the SEA might not have elected to use the subgroup size of 10 (for All Students) in its proposal.</p> <p>In addition, the SEA specifies that its analysis included only a measure of the number of Title I schools that would be identified, and made no mention of the impact these n-sizes might have on the entirety of public schools in the state.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>Describe analyses the state performed to determine that its uniform n-size will typically produce valid and reliable results, and/or describe any approaches the state plans to implement (e.g., multi-year averaging, confidence intervals) to help mitigate variability of year-to-year results.</p>

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

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	<p>ID describes how it has received feedback from various stakeholders on its proposed n-sizes and the state’s justification for proposing lower n-sizes for schools and subgroups than previously. The state’s response highlights ID’s goal to bring transparency to under-performing groups of students – specifically mentioning greater rates of inclusion for SWD and ELs.</p> <p>Idaho mentions collaborating with its Data Management Council but does not provide details on the council membership. On page 11, Idaho mentions feedback from stakeholders but does not indicate the specific groups</p>

	<p>mentioned. On page 13, Idaho outlines the online feedback opportunities and in-person feedback forums. Idaho does specifically mention feedback from legislators and how that feedback was used in determining the minimum n size.</p> <p>The SEA solicited feedback via online feedback requests and in-person forums but did not indicate their geographic or stakeholder diversity, other than mentioning that they were attended by “education stakeholders of all types.”</p> <p>Per the state’s plan, stakeholders provided feedback that the minimum n-size of 25 should remain, however legislator input stressed the importance of “maximizing small schools’ opportunities to receive support” by being identified under the state’s accountability system. This, in addition to a decision made by the state’s Data Management Council to change the minimum reporting size from 10 to 5, caused the SEA to reassess its minimum N and lower it to 20. Concerns (evidently from legislators) remained, however, that not enough small student groups would be captured with this n-size, so for subgroups other than “All Students”, the minimum N was set at 10.</p>
<i>Strengths</i>	The state engaged the field, including legislators, on the topic of n-sizes.
<i>Weaknesses</i>	Based on ID’s response to this item, it is possible that the state has weighted a policy objective (holding more schools accountable for more students) over statistical reliability. The SEA provided no rationale as to what drove its election of 20 as the minimum N size, only that the original N of 25 was reduced due to the encouragement of legislators and a change in reporting minimums to 5. No evidence was given regarding analyses of either 5 or 15 as potential minimums, and the only data provided on Title I schools identified at the 10 minimum were for the SWD and EL subgroups. In addition, no information was provided on how the state considered and addressed stakeholder feedback concerning the SEA’s decision to lower its minimum n-size despite their desire for it to remain at 25. Additionally, Idaho’s description does not address feedback from the specific stakeholder groups listed in the criteria.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Provide additional information on how the state collaborated with teachers, principals, other school leaders, and parents when determining the minimum n size.

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>	<p>ID has created a policy structure, backed by state statute and a Data Management Council, that addresses issues related to privacy of individual student data. The state used this structure to establish its proposed minimum n-sizes.</p> <p>Idaho provides information on the state agencies responsible for regulating the protection of individual student information but does not provide information on the specific methods used (e.g., top and bottom coding, suppressing totals, etc.) While it can be reasonably assumed that Idaho’s DMC outlined specific methods and considered whether a minimum n size of 10 would prevent disclosure of PII, Idaho did not provide a detailed justification.</p> <p>Page 14.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	ID has not specifically described how it will ensure that its selected minimum(s) for n-size would not violate individual student privacy.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The state plan must confirm that the minimum number of students selected by the Data Management Council (which supersede any other minimums that may be defined elsewhere unless expressly permitted by the DMC) will protect the privacy of individual students.</p> <p>The SEA must specify how the state statutes regarding personally identifiable information will ensure that the state’s n-size would not compromise student privacy, particularly in the many small schools with small student subgroup populations that the SEA has indicated are prevalent across the state.</p>

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>	ID’s Data Management Council has established a minimum reporting n-size of 5 students, with data suppressed for groups with less than 5 students. Additionally, “enrollment numbers and percentages will be displayed so long as there is at least one student within the subgroup”. The state indicates that “instances where 100% or 0% of students fall within one category and would risk the exposure of PII must also be approved by the Data Management Council or masked/blurred since doing so discloses information on either all or no students and thereby violates the minimum cell size policy”. It is unclear how the state operationalizes this latter rule. Page 14.
<i>Strengths</i>	The state has established a Data Management Council that establishes rules regarding minimum group sizes and personally identifiable information.
<i>Weaknesses</i>	The state’s response does not describe how it arrived at the minimum reporting n-size of 5, or how it determined that using a group of 5 students meets the requirements in ESEA section 1111(i), including with respect to privacy and statistical reliability.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Describe how the state determined that using a group of 5 students meets the requirements in ESEA section 1111(i), including with respect to privacy and statistical reliability.

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>	ID indicates that it established its long-term goals for academic achievement, reducing the percentage of non-proficient students by 33% over six years (by 2022, with 2016 baseline data), in consultation with various stakeholders. The described approach relies on a straightforward calculation that is likely to be understood by stakeholder groups, and—if achieved—would result in narrowing of achievement gaps between student subgroups because lower performing groups must make greater progress than higher performing groups to meet targets and the 2022 goal. The plan would be strengthened by additional data demonstrating that the expectations for the long-term goals exceed past performance trends. For example, long-term goals require a 2.6 percentage point increase in the percent of students achieving proficiency in ELA annually for six years. However, no data were provided to confirm that past performance has not exceeded this rate of achievement. ID apparently plans to apply the same approach to all student subgroups, however the plan does not include specific targets for racial/ethnic subgroups and the language arts table appears to contain a typo for the Minority students line. Pages 15 & 97.
<i>Strengths</i>	ID appears to have discussed and reached agreement with stakeholders on approach to setting long-term goals. Proposed approach will meet statutory requirements if applied to all student subgroups.
<i>Weaknesses</i>	State did not provide goals or targets for each racial/ethnic subgroup. The state’s plan indicates that “had these goals been set in the 2015 school year, a substantial number of schools would have achieved their school-level goal in 2016” (p. 15), which raises a question regarding the rigor of the goals.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to</i>	Provide baseline data, long-term goals, and interim targets for all student groups separately, including all racial/ethnic groups. Fix apparent typo in Table 5 (page 15 & 97) for minority students—target for 2018 and 2019 is the same—or, preferably, replace minority students line with discrete targets for individual groups.

fully meet this requirement

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>	See the peer analysis of A.4.iii.a.1 above, which notes the following: no data were provided to confirm past performance has not exceeded this rate of achievement, the plan lacks specific measures of interim progress for each racial/ethnic subgroup, and there is an apparent typo in Table 5 (page 15 & 97) in the “Minority” students row for 2018 and 2019.
<i>Strengths</i>	Idaho provides a clear formula for calculating interim goals that will be understandable to stakeholders, requiring equal steps of 1/6 th the gap to long term goals (However, this calculation was not applied consistently to each racial/ethnic group).
<i>Weaknesses</i>	The SEA has aggregated six of the minority/ethnic subgroups into a large “minority students” group, the nature of which does not permit it to provide subgroup-level interim progress goals for those six individual accountability subgroups.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Provide interim targets for all student groups separately, including all racial/ethnic groups.

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>	ID’s described approach relies on a calculation that—if achieved—would result in narrowing of achievement gaps

	<p>between student subgroups. With ID’s approach lower performing groups must make greater progress than higher performing groups to meet targets and 2022 goals. However, how Idaho is applying the formula may undermine this intent: it is unclear whether and how the approach applies to racial/ethnic groups.</p> <p>Idaho should carefully review its calculation of long-term goals and measures of interim progress to align with the state’s focus on historically underserved populations. By aggregating together students into one group, the state may mask significant under-performance of individual groups or commendable high performance of specific racial/ethnic groups.</p> <p>Page 16.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	The SEA has aggregated six of the minority/ethnic subgroups into a large “minority students” group.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Provide long-term goals and interim targets for all student groups separately, including all racial/ethnic groups. As reviewers were not provided a number of the subgroups’ interim or final goals, a decision on whether the SEA met all requirements for this indicator related to appropriateness of progress goals for all subgroups is impossible until those data are produced at the individual subgroup level (as opposed to being cloaked in the ‘minority students’ grouping).

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>	ID provides long-term goals and interim targets for all students and certain subgroups for the four-year cohort graduation rate, but as with the academic achievement goals and targets the state failed to provide specific goals and targets for each racial/ethnic subgroup. The state indicates that its goal is to reduce non-graduates by 75% over six years, however the long-term goal calculation provided seems to also incorporate percentage of students scoring

	<p>proficient and advanced on state assessments (page 16). If the aim is to clearly identify the percentage of students who are successfully graduating high school, assessment results should not be included in graduation rate goal/target calculations. For example, a school with a graduation rate of 65 percent that had 70 percent of its students score proficient/advanced should, using a straight calculation, be required to increase its graduation rate by 26.25 percentage points to reduce its non-graduates by 75 percent. If credit for the percent scoring proficient/advanced is included, based on the state’s proposed calculation, the school would only be required to increase its graduation rate by 6.25 points. Further, it is unclear specifically whose assessment results the state proposes to include: results from the graduating cohort, the school’s results from the graduation year (i.e., from younger students), or some other results. It is not possible to fully evaluate the ambitiousness of ID’s goals until assessment results have been removed from the calculation. Pages 16-17, 98.</p>
<i>Strengths</i>	<p>ID clarifies in its response that it plans to apply the same approach to setting statewide goals to establish individual district and school-level goals.</p>
<i>Weaknesses</i>	<p>Idaho’s calculation of the long-term goal on page 16 appears to incorporate the percentage of students scoring proficient or advanced on state assessments. This is inconsistent with the preceding text and later descriptions of graduation rate goal calculations.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>Remove assessment results from graduation rate goal/target calculation (page 16). Provide specific goals and targets for each racial/ethnic subgroup.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	ID indicates that it aims to incorporate an extended-year graduation rate in the future but does not yet have the data to do so.
<i>Strengths</i>	
<i>Weaknesses</i>	No information or data is provided for this element that the SEA wishes to include in its accountability system.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers) <input checked="" type="checkbox"/> Not applicable (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	For the purposes of reviewing the plan, the extended graduation rate goals and interim targets must be provided for the All Students subgroup along with the required racial/ethnic subgroups. Once Idaho calculates long-term goals for extended year graduation rates, those goals should be submitted for review and approval.

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>	See response to A.4.iii.b.1 above. Also, the table on page 17 and in Appendix A includes the same goal and targets for English learners and Minority students group. Idaho should confirm that the data in the table for EL students and Minority students is accurate and not unintentionally duplicated. It is unusual that the baseline results for these two groups are identical.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to</i>	Remove assessment results from graduation rate goal/target calculation (page 16). Provide specific goals and targets for each racial/ethnic subgroup. Correct or confirm targets for English learners group (same as minority students group).

<i>fully meet this requirement</i>	
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A.4.iii.b.4: Improvement necessary to close statewide graduation rate gaps

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	ID’s described approach relies on a calculation that—if achieved—would result in narrowing of graduation rate gaps between student subgroups. With ID’s approach groups with lower graduation rates during the baseline year must make greater progress than higher performing groups to meet targets and 2022 goals. However, similar to Academic Achievement measures of interim progress, Idaho should clarify whether and how interim targets for “minority” students apply to individual racial/ethnic categories (e.g. whether the same goal applies to each subgroup, whether all students are aggregated to the “minority” group, etc.) Page 17.
<i>Strengths</i>	
<i>Weaknesses</i>	The SEA has aggregated a number of subgroups into a larger subgroup, thus masking the individual groups’ data and goals.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA must provide baseline data, interim progress goals and long-term goals for the six subgroups aggregated into the “Minority Students” group in order for a determination to be made regarding the progress planned for closing the graduation rate gap in lower-performing subgroups.

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

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

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

➤ Is the long-term goal ambitious?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>ID indicates that it uses a placement/screening test (W-APT) to establish and track English language proficiency for English learners. It is unclear from the state’s response to this item whether it additionally administers the regular ACCESS assessments on an annual basis and, if so, whether and how the ACCESS results would be used. The state provides a long-term goal of reducing the percentage of English learners not making expected progress (increasing one performance level per year) by 33 percent by 2022, and equates proficiency to achieving Level 5 or 6 on the statewide tests. Accordingly, the state expects an EL with very low English proficiency, scoring in Level 1, to achieve proficiency 4 years after the student’s entry year. However, the state appears to frame the provided goal and targets as percentage scoring proficient, rather than percentage making progress toward achieving English language proficiency. The state indicates that it may revise its goals after receiving an additional year of results.</p> <p>Considering that, unlike with the content achievement or graduation rate goals, the ELP goal is not a measure of ‘proficient’ or ‘attainment’ but rather of progress, the 33-percent reduction goal does not appear to be ambitious. In addition, the SEA did not indicate its timeline for ELs to achieve English language proficiency, nor did it specify which grades would be included in the calculation of this goal. (Kindergarten scores would require a different baseline than described, as Kinder screener scores are reported differently than the other grades). Finally, the SEA states that the language screener is the instrument used to establish an EL’s proficiency level (p.18) and, possibly also the baseline. This is atypical, as the screener is a significantly less reliable assessment than the ACCESS for ELLs end-of-year ELP assessment in addition to the fact that the screener is intended to only be administered once in a student’s academic career. Page 18.</p>
<i>Strengths</i>	Idaho notes that the targets are set based on only one year of data but that it plans to review and potentially revise goals once additional data are available.
<i>Weaknesses</i>	The state’s response provides insufficient detail to evaluate its proposal. There is lack of clarity on grades included in this goal, as in Appendix B it appears that all grades are included, however the Kindergarten screener used for a baseline measure does not generate the score levels described in the plan. Goals are not ambitious (p.18) and are based on an instrument with weak reliability and no mention of the timeline within which ELs are expected to achieve proficiency. No historical data was provided that might contextualize these meager goals.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this</i>	Provide specific details on assessment/assessments used to determine progress toward attainment of English proficiency such as whether the state intends to use the W-APT screener or the regular spring ACCESS assessment (page 81) and/or whether the state plans to implement different approaches for different grades. Reframe goal and targets as percentage of students expected to make progress toward achieving English proficiency, and describe methodology used to establish goal and targets.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	See peer analysis in A.4.iii.c.1 above for additional details raised in the analysis of long-term goals that also affect measures of interim progress. Idaho describes a long-term goal of reducing the percentage of English learners not making expected progress (increasing one performance level per year) by 33 percent by 2022, and equates proficiency to achieving Level 5 or 6 on the statewide tests. Measures of interim progress are intended to represent equal intervals of 1/5 th the progress towards the long-term goal. However, the state appears to frame the provided goal and targets as percentage scoring proficient, rather than percentage making progress toward achieving English language proficiency (Table 7). Additionally, as referenced in A.4.iii.c.1 above, Idaho indicates that it uses a placement/screening test (W-APT) to establish and track English language proficiency for English learners. It is unclear from the state’s response to this item whether it additionally administers the regular ACCESS assessments on an annual basis and, if so, whether and how the ACCESS results would be used.
<i>Strengths</i>	
<i>Weaknesses</i>	State has labeled tables contained in plan inconsistently, which raises questions about the content provided in the tables. See Table 7 on page 18 and Table C on page 98.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Provide specific details on assessment/assessments used to determine progress toward attainment of English proficiency, such as whether the state intends to use the W-APT screener or the regular spring ACCESS assessment (page 81) and/or whether the state plans to implement different approaches for different grades. Reframe goal and targets as percentage of students expected to make progress toward achieving English proficiency, and describe methodology used to establish goal and targets.

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>	For this indicator, ID proposes to use the percentage of students scoring proficient or higher in language arts and mathematics on its statewide assessments for all schools, and states that it does not plan to average results over multiple years when identifying schools for comprehensive or targeted support. The state did not specify the assessed grade-level(s) for high school in the description. Pages 20-21.
<i>Strengths</i>	
<i>Weaknesses</i>	As described above in the section regarding minimum n-size, this indicator is likely to yield variable year-to-year results for small populations. Without implementing approaches to mitigate such variability, the reliability of the indicator for small cells is questionable. Additionally, it is unclear whether ID intends to measure performance of at least 95 percent of students in each subject area assessment or in both English language arts and math, and what ID intends to use as a denominator when measuring proficiency (the greater of 95 percent of enrollment or number of students participating).
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Idaho should clarify that it intends to measure performance of at least 95 percent of students in each subject area assessment or in both English language arts and math, and what ID intends to use as a denominator when measuring proficiency (the greater of 95 percent of enrollment or number of students participating).

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>ID aims to use “academic growth” as measured by the difference in percentage of students scoring proficient or above in the current year of testing as compared to the percent proficient or above two years earlier (or one year earlier for schools with limited historical data) as the state’s other academic indicator in grades 3-8 and high school. This approach is better termed “improvement” since it just measures the change in percent proficient between different cohorts of students as opposed to actual student-level growth. The state provides limited detail regarding its implementation plans, and does not clarify whether it plans to average data over multiple years.</p> <p>Idaho does propose to compare current proficiency rates to either the prior year or two years prior – depending on data availability. Idaho should consider how it would handle a school where performance in comparison to the prior year has increased, but in comparison to two years prior has decreased.</p> <p>Idaho should also consider working with its assessment technical advisory committee to explore alternate measures of student growth that allow for schools to demonstrate growth for students who have achieved proficiency and continue to progress towards advanced levels of achievement. Such a model may compensate for the “ceiling effect” referenced later in the plan.</p> <p>Finally, Idaho should clarify whether its measure of proficiency improvement would also apply to high schools. Pages 21-22.</p>
<i>Strengths</i>	An improvement model is easy to implement and easy for the public to understand

<i>Weaknesses</i>	Improvement models do not measure actual change in individual student performance. As a result, change may be attributable to other factors such as change in cohort characteristics. This is particularly true for small group sizes.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA should provide analyses to support its measures of student growth (improvement) to ensure their validity and reliability.

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>	ID plans to use the four-year adjusted cohort graduation rate as its graduation rate indicator. Based on its response, it appears that the state also plans to use graduation rate growth, as measured by the difference in percentage of students graduating in the current year as compared to two years earlier (or one year earlier for schools with limited historical data). If the state plans to incorporate graduation rate growth in its accountability system, which is a worthy consideration, it should do so as an indicator of School Quality or Student Success. The state indicates that

	it will not average graduation rates over multiple years, which raises the question of reliability for small cells. The state provided a description of how the graduation rate indicator relates to the 95% participation requirement, however, it is unclear that there should be any relationship between the two. Page 23.
<i>Strengths</i>	The state is currently working with stakeholders to develop an extended-year cohort graduation rate calculation.
<i>Weaknesses</i>	Graduation rate growth should be removed from this indicator and instead framed as an indicator of School Quality or Student Success since it is not aligned to the long-term graduation rate goals. The SEA must provide evidence of the validity and reliability of the calculation for its graduation “growth” indicator.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Graduation rate growth should be removed from this indicator and instead framed as an indicator of School Quality or Student Success since it is not aligned to the long-term graduation rate goals.

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>	ID indicates that it will use data from the 2017 ACCESS 2.0 administration to define progress for achieving English language proficiency but provides few additional details. The state’s response is insufficient to evaluate this item. For instance, ID states that the 2017 ACCESS will be used to measure progress in ELP, which appears to contradict p.18, wherein it states that the W-APT is used to “determine the level of language proficiency” as well as the baseline. No timeline to proficiency is provided, so it cannot be established that this calculation aligns with a proficiency timeline. Based on Appendix B, the appropriate grade levels are included, but no information is provided on the statistical analyses performed to establish this indicator calculation so validity and reliability determinations cannot be made. The SEA does not specify that all LEAs/schools across the state are included in

	this indicator, however the ‘weights’ chart (p. 28) seems to indicate that Title I schools have distinct weighting calculations. Weights for non-Title I schools are not specifically addressed. Page 23.
<i>Strengths</i>	
<i>Weaknesses</i>	There is no defined timeline to proficiency, grades to which this indicator applies are not explicitly stated (K-8 is referenced in Appendix B but not in the description for this section), the assessment(s) used for the progress measure is not clear (p.23 v. p.18) and no evidence that the SEA performed validity and reliability analyses on this indicator is included.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Provide a complete response to this item, including details regarding how the state will measure progress toward achieving English proficiency and specifically which ACCESS assessments it will use. In responding, Idaho should clarify that the state consistently measures 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 and clarify that this indicator will be applied to all schools in the state.

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>	ID plans to use one measure of School Quality at the K-8 levels and a different measure for the high school level (p.24). The K-8 measure will be a ‘satisfaction and engagement’ survey administered to students – though,

	<p>unfortunately, the state provided no sample survey or complete details regarding the planned survey. Without a sample of the survey, it is difficult to determine whether this would allow for meaningful differentiation in school performance. Concerning validity, the SEA indicates that by virtue of being disseminated by the assessment vendor, the data obtained by the school climate survey will be valid and reliable, however this cannot be assumed. (p.25). On p.30, an additional element (absenteeism) appears to be included in the School Quality measure for K-8. Overall, it is unclear what elements the state plans to incorporate into its measure of School Quality and Student Success for K-8 schools.</p> <p>Appendix B also notes grade 8 enrollment in pre-algebra or higher will be measured, but it is not listed on the SQSS table. Appendix B also notes different SQSS indicators applied to alternative high schools. Page 30 also references chronic absenteeism for SQSS.</p> <p>According to the state’s plan, its high school/ alternative high school indicator (p.24) will be based on “a combination of” students participating in advanced opportunities, earning industry certification and/or participating in apprenticeship programs. No mention is made of the relative weight of these elements to the calculation of the indicator as a whole. Relative weights are not provided for the discrete measures that comprise the HS indicator, and there is no evidence of validity or reliability analyses having been performed. Again, no weights are provided for these in the calculation of the School Quality indicator – therefore it is unclear how any one of them may impact a school’s quality rating. Idaho did not provide details regarding the timeline for implementation of this indicator. Given that the state plans to base the high school indicator on graduates (number of graduates will serve as the denominator), it is unclear whether Idaho intends the measure to be cumulative and if so when it could first measure both state and growth for the indicator (page 25).</p> <p>In addition, on page 24-25, the SEA states that the denominator for the high school college and career readiness indicator will be “all graduating students.” The SEA states that by doing so, “all students will be included in the results,” however since ‘all graduating students’ would not typically include students in grades 9-11.</p> <p>Overall, the state has provided insufficient detail to evaluate whether its proposed indicators meet ESEA requirements. Pages 24-25.</p>
<i>Strengths</i>	<p>A differentiated approach to measuring school quality promotes a rich, varied perspective of capturing authentic measures of school quality for the state. ID aims to measure both student satisfaction and engagement and college and career readiness in its accountability system. The SEA is holding alternative high schools to an ambitious and high standard – equal to that of standard high schools, while ensuring that unique elements critical to student success in such schools (credit recovery and accumulation) are considered in the calculation of its state-level accountability system (p.99).</p>
<i>Weaknesses</i>	<p>The description of the School Quality indicator for K-8 schools is parsimonious and lacks substantive detail. The</p>

	plan lacks evidentiary support for the validity and reliability of the Satisfaction and Engagement Survey administered to K-8 schools as the School Quality indicator. Relative weights are not provided for the discrete measures that comprise either the K-8 or HS indicator, and there is no evidence of validity or reliability analyses having been performed. It is unclear which students would be counted in the high school calculation and samples of the student surveys would have been a valuable tool to review.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Provide details regarding the student populations included (e.g., what grades), the composition of the high school indicator (specifically what would provide credit), the validity and reliability of the indicators, and the timeline for implementation. Specify the weights assigned to each element within the indicator in order to allow for review of the measure's ability to differentiate school performance as well as satisfy the requirement to ensure uniform calculations across the spectrum of schools. Clarify the specific measures the state plans to use in the college and career readiness indicator and whether the same indicator applies to all high schools, including alternative high schools. Provide evidence that each high school offers students the opportunity to participate in the CCR measure and/or consider adding a measure of access to such opportunities. Review and clarify discrepancies between Appendix B, page 30 and page 24, including whether indicators listed in Appendix B are used for reporting or ESSA accountability.

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>	ID plans to use a wide array of indicators for its annual meaningful differentiation of schools, and use a subset of those indicators, to annually identify schools for targeted support and every three years to identify schools for comprehensive support. For identification purposes, Idaho appears not to be using the full range of indicators. For example, Idaho will use the better result of either status or improvement for the academic achievement indicator – not both. The state will establish percentile ranks for both status and growth for each indicator and display these ranks without weighting on its school report cards for all students and student subgroups. Based on this description, it appears that ID is proposing to use a dashboard approach for its annual determination. Pages 25-27.
<i>Strengths</i>	

<i>Weaknesses</i>	The relationship between the annual differentiation and the state’s long-term goals and targets is unclear. Without weighting indicators or providing summary data, it is unclear how easily stakeholders and the general public will be able to interpret the annual determination. ESEA requires that academic indicators be weighted more than the school quality/student success indicators for purposes of the annual determination; it appears that ID only proposes to weight indicators when identifying comprehensive and targeted support schools. In such cases the academic indicators would be weighted more heavily.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Idaho should clarify whether percentile ranks are relative to all other schools in the state, or all other schools within the group of K-8, high school, or alternative.

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>	ID plans to establish percentile ranks for both status and growth for each indicator in its meaningful differentiation and display these ranks without weighting on its school report cards for all students and student subgroups. Based on this description, it appears that ID is proposing to use a dashboard approach for its annual determination. Page 28.
<i>Strengths</i>	The state plan references stakeholder feedback through the description for this section, including rationale for decision-making in support of, as well as contrary to stakeholder opinion.
<i>Weaknesses</i>	Without weighting indicators or providing summary data, it is unclear how easily stakeholders and the general public will be able to interpret the annual determination. ESEA requires that academic indicators be weighted more than the school quality/student success indicators for purposes of the annual determination; it appears that ID only proposes to weight indicators when identifying comprehensive and targeted support schools. In such cases the

	academic indicators would be weighted more heavily. Further, Table 12 on Page 28 does not include specific weights for all indicators. For example, depending on the school’s performance, the Other Academic Indicator (improvement in the percent proficient) will be weighted as either zero or 30 for ELA (or Math). Given that the Other Academic Indicator may be weighted at zero, it is unclear how Idaho justifies the indicator receiving substantial weight individually.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Provide weights for indicators for the purposes of the annual meaningful differentiation of schools, including how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students (such as P-2 schools). Provide a justification on how the Other Academic Indicators receive substantial weight individually. Clarify whether the SEA plans to apply this accountability system only to Title I schools or to all public schools in the state.

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>	ID indicates that this question is not applicable, however it is unclear from the state’s response how schools without tested grades are included in the state’s system.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers) <input checked="" type="checkbox"/> Not applicable (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this</i>	Describe how schools without tested grades are included in the state’s system.

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>	ID proposes a radical approach to identify schools for comprehensive support, selecting the higher of status or growth achievement ranks for the identification year (not averaged across years) and discarding the lower, then averaging across all indicator results (language arts, math, EL proficiency, school quality). This approach is likely to raise issues of face validity given the expected variability in year to year results for small cells (minimum n=20), inclusion of cohort growth results that may be attributable to change in student characteristics rather than student performance, and the potential dismissal of very low student achievement results. While the state provides a relatively clear description of its planned approach, it is not clear that the methodology will identify schools that are truly the lowest performing in the state. In addition, Idaho proposes identifying schools in 2018-19 using data from the prior 3 years. It is unclear how the state will include data from the School Quality and Student Success indicator in grades K-8 given the effective date is listed as 2018-19 in Appendix B. Pages 29-30.
<i>Strengths</i>	<p>Idaho will review data annually to determine whether a school’s performance in an off-cycle year would have otherwise resulted in a CSI designation. Idaho will offer these schools support and place them on a watch list, encouraging improvement actions to address under-performance.</p> <p>Idaho will also designate non-Title I schools if their results fall within the performance range of the lowest performing 5% of Title I schools.</p> <p>From step 7 on page 30, it appears that Idaho is identifying the bottom 5% by school category (K-8, high school, and alternative high school separately). Therefore, it is possible a school within the alternative high school category would not be identified even if it had significantly lower performance than an identified high school.</p>
<i>Weaknesses</i>	Absenteeism is noted in the table on p.30, however it does not appear to be addressed in the School Quality survey information on p.24. It is unclear whether this is a separate element or included in the school climate survey itself

	because a sample copy of the survey was not included with the plan.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	If Idaho is taking the bottom 5% of each school category, it is possible that a school within the alternative high school category would not be identified even if it had significantly lower performance than an identified high school. ID should provide a rationale for how the proposed methodology meets the requirements to identify the lowest performing 5% of Title I schools in the state.

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>	ID proposes a straightforward approach to identifying schools for comprehensive support based on low graduation rates. It will average graduation rates over three years; those with average rates below 67 percent will be identified. It is unclear, however, whether this approach excludes alternative high schools.
<i>Strengths</i>	The state’s approach is clear and transparent, and mitigates variability by employing multi-year averaging.
<i>Weaknesses</i>	Idaho should confirm that all public high schools includes alternative high schools.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.vi.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>	ID proposes to use the same methodology to identify schools for additional targeted support as it plans to use to identify schools for comprehensive support (described in A.4.vi.a above), by applying the methodology to subgroups and determining which are lower performing than the state’s lowest performing 5 percent of schools. The state’s proposed methodology for comprehensive schools is unlikely to reliably identify the state’s lowest performing schools; applying this methodology to subgroups with a smaller minimum n-size is likely to exacerbate the effect. Additionally, the state’s timeline for identifying schools is unclear: in this section of the plan it states that schools that are identified for additional targeted support for 3 consecutive years will be identified for comprehensive support, however in section A.4.vi.f the state indicates that it will only identify schools for additional targeted support every three years. Pages 30-31.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Clarify the timeline and approach to identifying schools in this category, describing whether the state plans to identify schools every three years or every three cycles (every nine years).

A.4.vi.d: Frequency of Identification

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	ID plans to first identify schools for comprehensive support in 2018-19, and will identify schools every three years thereafter.
<i>Strengths</i>	The state meets the statutory requirements.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	ID proposes to identify consistently underperforming subgroups by measuring “student group gaps to their non-group peers”, and identifying schools for targeted support when a student group has a gap of 35 percentage points or more averaged over three years in any indicator. Given the state’s description of the system of meaningful differentiation based on percentile ranks, it is unclear exactly how the state’s proposed methodology would work, which students will comprise the “non-group peers”, and/or why the state selected 35 percentage points as the trigger for identification. Idaho’s plan would be strengthened by providing the number of schools with a 35 point

	gaps and/or statewide data showing comparisons to non-group peers. While Idaho lists the subgroups consistently reported elsewhere in the plan, there does not appear to be a definition of non-group peers. For example, it is possible to infer that Idaho will explore gaps between SWD and their non-disabled peers. However, it is unclear what the non-group peer is for the minority subgroup, which page 31 lists as 6 of the 7 racial/ethnic categories. Page 31.
<i>Strengths</i>	Idaho’s intent to identify and support schools with significant gaps between student groups is commendable. The state proposes to use multi-year averaging, which will help mitigate negative effects of small n-sizes.
<i>Weaknesses</i>	The state appears to propose using a gap between any indicator rather than a persistent gap across indicators for identification; a gap based on a single indicator may not be representative of “consistent underperformance”, particularly given the state’s proposed approach to measuring growth—which is better described as improvement and as such is subject to ceiling effects. It is unclear how ID plans to measure gaps in performance for the progress in ELP indicator.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Provide additional details regarding the proposed methodology, including how the state will make comparisons to the non-group peer for race/ethnicity categories and clarify how gaps will be evaluated in all indicators, including both growth and status.

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>	ID proposes to use the same methodology to identify schools for additional targeted support as it plans to use to

	identify schools for comprehensive support (described in A.4.vi.a above), by applying the methodology to subgroups and determining which are lower performing than the state’s lowest performing 5 percent of schools. The state’s proposed methodology for comprehensive schools is unlikely to reliably identify the state’s lowest performing schools; applying this methodology to subgroups with a smaller minimum n-size is likely to exacerbate the effect. Additionally, the state’s timeline for identifying schools is unclear: in this section of the plan it states that schools that are identified for additional targeted support for “3 consecutive years” will be identified for comprehensive support. However in section A.4.vi.f the state indicates that it will only identify schools for additional targeted support every three years. Pages 30-32. It is unclear to reviewers whether the state intends to identify schools for additional targeted support schools every three years or for “three consecutive years”.
<i>Strengths</i>	
<i>Weaknesses</i>	Based on the SEA’s plan, it appears that each school will have 2 scores for each indicator: Growth and Achievement. It is unclear whether the SEA will factor the different type of scores into their calculation or not. (Meaning the highest All Student score in Math for a CSI school might be from that group’s Growth category, whereas the comparison school’s subgroup Math score might have been from that subgroup’s Achievement category.) According to the SEA’s plan, there will be two ‘highest’ All Students scores for each indicator – the highest Growth score and the highest Achievement score – ...is that considered when school comparisons are made in this plan?
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Clarify the timeline and approach to identifying schools in this category. Clarify the race/ethnicity subgroups used for identification. Affirm that schools will be identified from all schools in the state and not by school configuration.

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>	Although the state indicated that this item is not applicable, Idaho intends to recognize schools that meet or exceed interim progress measures and those that rank at the 90 th percentile or above (page 30).
<i>Strengths</i>	Idaho’s system outlines recognition for schools achieving high expectations for their students.
<i>Weaknesses</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>ID proposes to designate a school or subgroup as not having met its interim progress target toward its long-term goals if the school or group fails to meet the 95% assessment participation threshold. Given the lack of clarity regarding long-term goals/targets and the annual differentiation, it is unclear how this approach will be implemented and reported. ID will average participation rates over three years for any school or group that fails to meet the target in the current year; despite this averaging, the state is likely to identify a large number of subgroups as failing to meet the target given its proposed minimum n-sizes (20 for all students, 10 for subgroups). ID indicates that it will support schools or districts not meeting the minimum participation threshold in writing parent outreach plans and/or using funds for “school board and superintendent training on data-driven decision-making and assessment literacy”. The connection between such training and low participation rates is unclear.</p>
<i>Strengths</i>	<p>ID aims to ensure that at least 95 percent of students and subgroups participate in state assessments.</p>
<i>Weaknesses</i>	<p>By averaging three years of participation rates, the state will at times allow school rates of participation to fall below the required 95 percent.</p> <p>The state’s plan lacks a description of 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.</p> <p>Consider restating the following sentence in the affirmative: “For the purposes of this plan, ‘measureable progress</p>

	in ISAT proficiency’ is defined as not having met the school’s interim progress measure toward its long-term goals in any group where 95% participation is not attained” (p. 32).
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>ID proposes to exit comprehensive support schools when the schools no longer fall into the lowest performing 5 percent, have demonstrated a “consistent growth trajectory”, and have a written plan for sustaining improved student achievement. Additionally, ID proposes to allow a school to exit comprehensive support status if it meets its second-year interim goals. It is unclear what goals ID is referencing in this case: the interim targets based on long-term goals, or other goals that will be established specifically for comprehensive support schools. With no timelines articulated, it appears that a school could potentially exit during the year of its initial identification, which would fail to ensure that the success is more than a fluke or computational anomaly.</p> <p>The exit criteria for schools with low graduation rates are clearer: a school so identified that improves its graduation rate for two or more years (either above 67% for two consecutive years or averaging over 67% for three consecutive years) may exit. Page 33.</p>
<i>Strengths</i>	The state’s plan allows for a pathway of 1 of 2 options to be met for a school to exit Comprehensive Support and Improvement School status for schools with graduation rates below 67 percent.

<i>Weaknesses</i>	<p>The state’s proposed approach to identifying comprehensive schools for low performance raises concerns that it may not truly identify its lowest performing schools. Accordingly, by using the same approach to identify potential exit criteria, it is unclear that the performance of exiting schools will represent meaningful improvement in all cases. The state should also define “consistent growth trajectory”.</p> <p>Although the graduation exit criteria list the number of years that would be included in the calculations, none of the stated criteria indicate how many years a school has to improve before it is expected to have met these criteria. Therefore, the “within four years” requirement is not met explicitly in this indicator.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>Define consistent growth trajectory, and clarify what interim goals will be established for comprehensive support schools. Review the text on page 41 and adjust as necessary to ensure consistency in the exit criteria and specify the number of years a school has to improve before it is expected to meet the exit criteria.</p>

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

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	<p>It appears that ID plans to establish three-year goals and interim targets for schools identified for additional targeted support that are different, and more aggressive, than the state’s overall long-term goals and targets. The intersection between these various goals and targets is unclear, and adds a potentially unnecessary layer of complexity to the system. Additionally, the state references “consistent growth trajectories”; it is unclear that having a consistent growth trajectory means meeting the interim targets for the three-year goals, or something different. Further, ID proposes to use the same methodology to identify schools for additional targeted support as it plans to use to identify schools for comprehensive support (described in A.4.vi.a above), by applying the methodology to</p>

	subgroups and determining which are lower performing than the state’s lowest performing 5 percent of schools. The state’s proposed methodology for comprehensive schools is unlikely to reliably identify the state’s lowest performing schools; applying this methodology to subgroups with a smaller minimum n-size is likely to exacerbate the effect. When the identification methodology is suspect, so too are exit criteria that rely on the same methodology. Page 33.
<i>Strengths</i>	
<i>Weaknesses</i>	It is unclear in this section whether or not the three-year timeline for which schools are assigned their school improvement goals is the time period in which the school is expected to meet the Targeted Support exit criteria, though the response in A.4.viii.c. seems to indicate it is 3 years. It is also unclear as to whether the reduction of the gap by 50% over 6 years equates to the “consistent growth trajectory” noted as an exit criterion or, if not, what the SEA’s definition of “consistent growth trajectory” might be.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Clarify relationship between various goals and targets referenced. Clarify the expectations of the schools in terms of a ‘consistent growth trajectory.’ Define “consistent growth trajectory” so that schools will be able to determine whether or not they have met this criteria and clarify how goals to reduce the non-proficiency gap by 50% factor into the exit criteria.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	ID adequately describes the process it will follow to determine more rigorous interventions for comprehensive support schools that fail to meet the exit criteria. However, the state’s plan includes generic action items such as “recommend additional school interventions to school, LEA, and state leadership” (p. 35) and lacks descriptive analysis and substantive detail for the types of interventions appropriate for schools identified for comprehensive support and improvement that fail to meet the state’s exit criteria over time. Pages 33-34.
<i>Strengths</i>	The state’s plan includes a four-pronged, multiple-method approach to action items involving action research that incorporates a wide-variety of stakeholders.
<i>Weaknesses</i>	The state’s plan includes generic action items such as “recommend additional school interventions to school, LEA,

	and state leadership” (p. 35) and lacks descriptive analysis and substantive detail for the types of interventions appropriate for schools identified for comprehensive support and improvement that fail to meet the state’s exit criteria over time.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Describe the specific actions and interventions that could be taken after a school fails to exit comprehensive support status and the roles/responsibilities of the school, district, and state.

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>	ID indicates that it will annually review ESSA program allocations, through its consolidated federal and state grant application, for LEAs identified as having “50% or more of comprehensive and targeted support and improvement schools every year”, and that the SEA will target its own school support resources for such LEAs. It is unclear from the state’s description whether it intends to support only LEAs that have 50% or more of the state’s comprehensive and targeted support schools or LEAs within which 50% or more of schools are so identified. Further, it is unclear what school-level allocation data are available for federal programs beyond Title I. Page 35.
<i>Strengths</i>	ID appears to use a consolidated federal and state funding application for its LEAs.
<i>Weaknesses</i>	It is unclear from the state’s description the LEAs for which it intends to conduct resource reviews and/or target its own resources. Idaho should consider supporting the district in reviewing its allocation of local resources, both financial and human, to ensure schools with the most need receive the most support.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this</i>	

<i>requirement</i>	
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A.4.viii.e: Technical Assistance (ESEA section 1111(d)(3)(A)(iii))

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	ID describes a robust statewide system of support for comprehensive and targeted support schools that includes hands-on, expert assistance, availability of networks, and funding. Idaho will also assume responsibility for ensuring interventions selected are evidence-based. The statewide system of support includes a wide variety of strategies and supporting descriptive information for utility in practice. Pages 35-45.
<i>Strengths</i>	Based on the description provided, ID has established a thoughtful, comprehensive approach to supporting staff and students in low performing schools. The SEA has laid out an extremely robust technical assistance plan that appears well thought-out, inclusive of stakeholder input and sensitive to the diverse needs of districts and various student populations. This system supports the SEA in ensuring that LEAs’ steps for improvement are “evidence-based and managed for high performance” (p. 35). (p.35-45)
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

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>Peer Response</i>
<i>Peer Analysis</i>	ID reports that a 2015 analysis of student demographics and educator quality in the state did not identify a correlation between student group and educator quality, but that the state faces challenges with teacher recruitment and retention, particularly in rural areas. The state indicates that it will first analyze data related to disproportionate rates of low-income and minority children served by ineffective, out-of-field, or inexperienced teachers in 2017-18. It is unclear from the state's response why it was unable to analyze these data prior to submitting this plan.
<i>Strengths</i>	ID has defined the necessary categories of educators, and can build on work begun in 2015 for its federally-required Educator Equity Plan. The state's plan clearly identifies funding sources for strategies to support educators.
<i>Weaknesses</i>	No current data were provided by the state.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Provide updated (2017-18) data related to disproportionate rates of low-income and minority children in Title I, Part A schools served by ineffective, out-of-field, or inexperienced teachers.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>ID describes existing and new statewide initiatives to support improved school conditions for student learning, including the use of Title IV, Part A and state funding.</p> <p>The SEA describes a number of initiatives, outside of those funded under Title IV, which either directly or indirectly support the improvement of school conditions for learning, and reduce student-on-student aggression and aversive behavioral interventions, including removal from the classroom for disciplinary purposes.</p>

	<p>The SEA implements a suicide prevention grant that, it believes, has demonstrated effectiveness in ancillary behaviors that improve student health and safety and conditions for learning (the development of internal strengths – grit, resilience, hope and connectedness). This, in addition to \$4 million in ongoing state formula funding that supports safe and drug-free schools, also makes an effort in reducing risk behaviors in students. An annual Idaho Prevention and Support Conference is attended by a large variety of student support stakeholders (700 annually) as part of this state grant and its themes focus on the development of disciplinary policies and practices that are trauma-informed and, thus, recognize the impact of student experiences on their behavior.</p> <p>In 2015, a state law was passed requiring LEAs to report to the SEA all incidences of bullying and to reduce the instances and impact of bullying on school sites. PD is required of school staff; staff have requirements to intervene in bullying/harassment situations and a set structure of graduated consequences have been put in place to discourage escalation by the offenders.</p> <p>These state-funded initiatives coordinate with those provided using Title IV funds, such as PBIS, staff training on crisis training and mental health support, MTSS, mentoring programs, special programs as alternatives to suspension/expulsion and wellness programs, among others. Pages 47-48.</p>
<i>Strengths</i>	<p>The SEA appears to have a well-coordinated and fleshed-out program for student support that addresses the whole child and many behaviors associated with student achievement. It is notable that both the SEA and the state legislature have recognized and secured state-level and grant funding for this important aspect of students’ educational program.</p>
<i>Weaknesses</i>	<p>Apart from the statement, “While the data analysis did not point to disparities in terms of the distribution of personnel who are working with low-income or minority students, it did identify a shortage of personnel across all areas, including areas not previously identified” (p. 70), the state’s plan lacks clear description of low-income and minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers. The state’s plan lacks a description and evidentiary support of 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.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to</i>	

fully meet this requirement

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>ID describes existing approaches within the state to address student transitions, and indicates that in 2017-18 the state will convene a task force focused on transitions between elementary/middle and middle/high school that will aim to create systems of support for students.</p> <p>As the administrative agency over P-20 education in the state, this SEA appears to have developed a number of initiatives and programs that aid in making transitions as seamless as possible for students moving through various levels of school, reducing the likelihood of students dropping out.</p> <p>At the elementary level, early intervention literacy programs (for students requiring them) involve increasing levels of academic support for students with greater need. The goal of this early detection is to remove barriers to learning, particularly as a student ages, with the goal of ensuring the student’s success and confidence in school.</p> <p>At the middle school level, a “Middle Level Credit System” supports school staff and leadership, the curriculum, intervention needs, accountability and student transitions to high school. Of particular interest is the fact that transition plans are required of 8th graders as they move into high school. 8th graders also have access to college and career advisors as well as a career information system that introduces them to the requisite skills for a wide range of careers.</p> <p>8th graders and high school students also benefit from state funding that offsets costs associated with college entrance exams, dual enrollment, AP and IB coursework and overload credits. This appears to have had a marked impact on high school students participating in advanced opportunities, as nearly 50% did so in the 2016-17 school year. In addition, career technical schools, field experiences, state-of-the-art training and alignment with post-secondary credits encouraged continued enrollment and program completion. Similarly for alternative high schools, the unique, additional supports provided to students (thanks to augmented state funding) are based on student needs (fewer classes per day, subsidized summer school, daycare centers, and specialized counselors/psychologists).</p>

	These proactive measures are geared toward addressing ‘life’ demands that have the potential to cause a roadblock for students who might otherwise wish to continue their education. Pages 48-52.
<i>Strengths</i>	The state’s plan for supporting students transitioning from middle to high school includes a Middle Level Credit System (established in 2007), a career information system, and college and career advisors. The plan includes a comprehensive approach to school transitions, including elementary, middle, and secondary transitions, including alternative schools, EL students, and students with disabilities, as well as support for post-secondary opportunities.
<i>Weaknesses</i>	Idaho should consider expanding its description for supports for students in middle school.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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>	ID states that ESSA provided the SEA the opportunity to revise its previously determined entrance and exit procedures for ELs, and describes the composition of an EL workgroup that met six times over the 2016-17 school year, as well as training on the revised entrance and exit procedures that was delivered in 15 locations in the state. The state’s entrance criteria generally seem comprehensive and reasonable, however no information is provided on the procedures for reviewing the Home Language Survey responses and whether there are universal protocols in

	place for determining whether a student is identified as a potential EL and should move to the next identification step. In addition, no information was found, in the plan or where directed on the SEA website, on the components of the “Decision to Assess” matrix or its completion protocols. The state’s exit criteria appear to rely solely on English language proficiency results and do not take into account local assessments or observations. Pages 79-82.
<i>Strengths</i>	The state describes an inclusive, comprehensive process taken to review and modify its entrance and exit procedures for English learners, and to inform the field of the resulting changes.
<i>Weaknesses</i>	Table 18 on page 80 appears to be mislabeled, as the criteria included describe strong, not weak, English language proficiency. The state has not included procedures for including local input in its exit criteria; instead it relies solely on statewide assessment results.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Provide additional detail regarding the “Decision to Assess” matrix and, ideally, include the matrix as an appendix. This would permit a comprehensive review of the complete entrance process to ensure that the procedures can be applied uniformly statewide. Provide the state’s standardized, statewide exit procedures for those ELs whose exit is based on the Alternate ACCESS exam. Correct header on Table 18 on page 80, which appears to be mislabeled as Entrance Criteria.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The state describes a comprehensive and seemingly reasonable approach to providing support to its LEAs that serve English learners, including the annual submission by LEAs of an English Learner Plan. The state has dedicated staff and funding in place to help LEAs meet their goals for English language proficiency.</p> <p>The SEA plans to analyze long-term and interim progress goals for both ELP and attainment of academic content standards and develop individualized supports for LEAs, where possible, to supplement its other various initiatives that include: cross-divisional collaborative activities (PD, technical assistance, program monitoring), EL/Title III-specific technical assistance (general and individualized, delivered via a number of electronic and in-person formats), state-level funding of programs for ELs, two statewide EL coaches, partnerships with IHEs to embed EL</p>

	<p>instructional strategies in the pre-service teacher education curriculum and (planned for fall 2017) regional intensive professional learning workshops on instructional strategies for regular classroom teachers (K-12) to support language development through content instruction.</p> <p>Pages 82-84.</p>
<i>Strengths</i>	.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>ID describes a seemingly reasonable approach to monitoring and providing technical assistance to LEAs receiving Title III funds. The state uses a risk assessment approach to determine LEA monitoring, and partners with its general statewide system of support team to provide targeted assistance to its neediest LEAs.</p> <p>The SEA conducts on-site and desktop monitoring of approximately 25 LEAs annually. It is not specified whether all 25 of these LEAs are selected from the statewide LEA pool (meaning, it includes monitoring for OCR/state program compliance) or solely from the subset of Title III-recipient LEAs (for review of supplemental Title III programs). The SEA uses classroom observations and staff, student and parent interviews to ascertain whether the LEA is addressing ELs' academic and linguistic needs and is implementing its plan as proposed in the consolidated application for funds. In addition, as LEA data is compiled for the SEA's CSPR submission, the SEA reviews it to determine whether there exist any local level trends that indicate a need for state intervention.</p>

	<p>Assistance to LEAs from the SEA appears to be coordinated through the State Technical Assistance Team (STAT) when trend data or monitoring evidence indicate a need for intervention in either identifying or implementing effective strategies for ELs, Pages 84-86.</p>
<i>Strengths</i>	<p>The state’s plan includes specificity in process, as well as action steps for additional support beyond those provided in during technical assistance (i.e. “in-depth professional development, recommendations for Title III program revisions, and opportunities for peer observations with successful Title III districts”) (p. 85).</p>
<i>Weaknesses</i>	<p>The narrative concerning the monitoring process does not appear to include the review of data for LEA monitoring purposes, but rather a qualitative analysis of the LEA’s EL program (or is it Title III program? Are they one and the same in this SEA?).</p> <p>In addition, it is unclear if the SEA’s EL/Title III department provides technical assistance independently of the STAT, or if the department’s role is to be ‘identifying LEAs that may need more specific and individualized support in identifying effective strategies for their ELs.’ Is the Title III team’s role to identify LEAs that cannot discern which strategies are effective for ELs, only providing TA with the STAT team “if an LEA continues to struggle with implementing effective strategies for EL proficiency”?</p> <p>The last paragraph on page 85 of the plan could be strengthened</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	