

STATE PLAN  
PEER REVIEW CRITERIA  
Peer Review Panel Notes Template

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STATE: Indiana



**U.S. Department of Education**

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

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

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>IN proposes to grant 8<sup>th</sup> graders the opportunity to enroll in high school math courses, specifically Algebra I. The state is currently developing end-of-course assessments (ECAs) to be included in their new assessment system in the 2018-2019 school year, including an ECA for Algebra I; however, it is unclear when IN will be implementing ECAs. The Indiana State Board of Education must still make a final determination on ECAs for use at the middle school later.</p> <p>The state, on the other hand, did not communicate how all students the state will be prepared or readied for advanced math coursework in middle school. There are no statewide strategies for advanced course preparation beginning as early as elementary school. (pages 29-30)</p>
<i>Strengths</i>	IN will include educators in developing the assessment blueprints and item specifications as it prepares for new assessment. The state expects to

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

	implement end of course assessment aligned to standards in 2018-19.
<i>Weaknesses</i>	<p>Currently, there is significant local discretion regarding in which courses students may enroll, which may limit the opportunities for students to prepare for and enroll in advanced mathematics courses. Furthermore, there is no specific plan in place that includes elementary to middle school preparation for 8<sup>th</sup> graders to be prepared for advanced coursework.</p> <p>The decision to approve Algebra I ECA for 8<sup>th</sup> graders is waiting IDOE approval. IN's plan indicates ECAs will only be developed for Algebra I for administration in 2019 with state approval (p. 29). If students complete the Algebra I course in grade 8, the plan provides no information about how the state's standardized assessment for grade 10 will be relevant for the course work being completed by those students. The plan needs to address the grade 10 mathematics assessment which will be used to ensure all students are included in the accountability system.</p> <p>Other than the development of ECAs, the state did not discuss strategies it would use to allow students to take advanced mathematics courses in high school.</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>	IN has noted the decision to approve Algebra I ECA for 8 <sup>th</sup> graders is waiting IDOE approval. If IN elects the 8 <sup>th</sup> grade math exception in A.2.i the state must develop a plan that prepares kindergarten through seventh grade students to take advanced mathematics in eighth grade. IN must include in its plan a description of the course-taking pattern and the assessments that eighth graders who take advanced mathematics will complete during 8 <sup>th</sup> grade and once they enter high school.

### 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>	IN provides a rich description of the composition of the languages its

	<p>students speak. However, IN fails to provide a definition of most populous language spoken by its test-takers.</p> <p>The state does not identify the <u>percent of test-takers</u> who speak a language other than English. Yet, IN identifies Spanish as the most populous language spoken by its test-takers because a large percentage of the overall English Learner student population speaks Spanish. The state does not provide evidence to show the existence of languages other than English are present to a significant extent in the tested student population. IN’s plan also does not provide a definition of the threshold needed to require assessments in languages other than English. (page 30)</p> <p>IN uses the term “refugee” interchangeably with “migratory”, although these are different student populations. (page 30)</p>
<i>Strengths</i>	<p>IN provided an overview of the languages spoken by students. Languages spoken and the percent of students were included. Additionally, the primary language of migrant students was included. IN included the languages spoken by migrant and refugee students.</p> <p>Other languages spoken by its English Learners were identified including Burmese, Chin, German, Pennsylvania Dutch, Arabic, Mandarin, Sichuanese, Punjabi, and Vietnamese.</p>
<i>Weaknesses</i>	<p>IN’s plan is using a language’s proportion of ELs as a determining factor for administering some assessments in ILEARN in Spanish, rather than basing the decision on identifying the languages other than English that are present to a significant extent in the participating student population.</p> <p>The state did not use a research/evidence based or recommended best strategy to identify a threshold of a language group to identify its “languages other than English that are present to a significant extent in the participating student population”. Thus, stakeholders did not have sufficient data to make sound judgement in determining which assessments in languages other than English are needed.</p> <p>There are four LEAs where additional languages are spoken and the state does not address a clear strategy of providing students who attend these schools assessments in their native language.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewers)</p> <p><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>First, IN must implement a methodology that identifies the most populous spoken language based on the percentage of students in the test population. Second, IN must establish a scientifically sound threshold for defining “languages other than English that are present to a significant extent in the participating student population.”</p>

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>	Peer reviewers found IN’s response to this section confusing. Currently there are no assessments in languages other than English. However, IN proposes to offer the state assessment, ILEARN, in Spanish in the mathematics and science content areas. There is no timeframe included in the state’s response detailing when these assessments will be developed, vetted, and approved even though there is a 2018-2019 target date.  The state reported that after a 2017-2018 review, they may administer some portions of the English/language arts ILEARN test in Spanish. Details about the Spanish versions of the tests do not show the translated assessments are comparable to the adaptive tests. (page 30-31)
<i>Strengths</i>	IN is planning to implement plans to procure Spanish versions of its ILEARN mathematics and science tests. The state is also considering to make available some portions of the English/language arts test provided it does not compromise the test.
<i>Weaknesses</i>	IN’s plan provides a brief description of a new assessment system which will allow for computer-adaptive assessments in grades 3-8, English 10, and Algebra I, but does not specify the grade 10 mathematics assessment. The plan does not include information regarding the grade levels where the translated assessments will be available.
<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>	IN’s plan must clearly state which existing assessments are currently available in languages other than English. If assessments are available, then the tests’ content areas and grade levels must be communicated.

### 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>	IN will administer assessments in the Spanish language for content areas that are not compromised by the English to Spanish translation. Because IN has not established and applied a threshold that can be used to identify which, if any, language other than English is present to a significant extent in the test student population requires an assessment in that language, reviewers cannot confirm if the state’s response is sufficient. On page 31, IN states that the Indiana Board of Education recommends that Burmese, Arabic, Mandarin Chinese, and Vietnamese versions of the test are available in the future.
<i>Strengths</i>	
<i>Weaknesses</i>	Three peer reviewers noted that because IN has not applied a scientific method

	<p>or best practice to identify its needs, the proposed other than English language versions of tests are not based on appropriate evidence.</p> <p>IN’s plan indicates the availability of assessments in languages other than English and Spanish will be dependent upon the item bank available from the vendor who wins the fall 2017 bid for statewide assessments (p. 31, iv.1), which creates the appearance the state has too little control in creating the assessments. One reviewer did not share this opinion.</p> <p>For the proposed translated assessments, the plan provides a description of input received from EL program staff, EL parents, and other EL advocates, but no attention to inclusion of the content experts outside the EL program community.</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>Three reviewers note IN must implement a methodology that identifies the most populous spoken language based on the percentage of students in the test population. And, IN must establish a scientific sound threshold for defining “languages other than English that are present to a significant extent in the participating student population.” (see identified areas of weaknesses in section Aiii.1) From this process, IN must use the information to identify the other than English language versions of academic assessments that are needed.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>IN explains that a request for proposal (RFP) to create Spanish versions of the ILEARN will be implemented during fall 2017. RFP details such as content areas, grade levels, timeline, and test delivery methods are not included in the plan.</p>

	IN does not provide any supporting evidence to support IDOE’s recommendation to create ILEARNS tests in Burmese, Arabic, Mandarin Chinese, and Vietnamese. (page 31)
<i>Strengths</i>	<p>The state may license items in languages other than English (Spanish, Burmese, Arabic, Chinese and Vietnamese) beginning in 2018-19 SY. Decision on which translations to administer is a local one. Considerable outreach occurred.</p> <p>IN included a variety of stakeholders in the ESSA workgroups and, specifically to this section, they included English language (EL) teachers, administrators, parents, members of migrant parent advisory councils, the Immigrant Welcome Center, and the Burmese American Community Institute.</p>
<i>Weaknesses</i>	<p>IN’s plan has a brief description of the stakeholders consulted in deciding what languages needed translated assessments for the current translations, but does not have a plan for developing assessments going forward.</p> <p>The selection of assessments that should be developed is not based on the appropriate data because IN did not employ an appropriate method to identify languages other than English that are present to a significant extent in the participating student population</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>	IN must accurately identify the languages that meet “languages other than English that are present to a significant extent in the participating student population” threshold and use the information as it implements actions to develop assessments in the languages other than English. Additionally, IN must include stakeholders that include teachers, principals, parents, content experts, technical experts in making decisions about developing these assessments. IN’s plan must include procedures and details that spell out the process that show a commitment for ensuring assessments in the languages other than English are developed timely and for the testing group that require them.

**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>	IN includes the following racial and ethnic groups in their accountability system: American Indian, African American, Asian, Hispanic, Multiracial, Native Hawaiian/Pacific Islander, and White in its accountability plan. (page 43)
<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>	

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>	IN does not include additional subgroups in its accountability system. (page 43)
<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"/> Not applicable (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>	Because IN used an older version of the ESSA template, it provided information that describes its procedures for determining when recently arrived

	<p>English Learners will participate in state testing and accountability system. Three reviewers assumed that IN is “Applying the exception under ESEA section 1111(b)(A)(i)”. (pages 43-44) If this assumption is inaccurate, the plan should explicitly communicate its choice of flexibility request.</p> <p>IN’s definition of a recently arrived English learner is a student enrolled in US schools for less than twelve cumulative months during the school year. For these students, IN will:</p> <ol style="list-style-type: none"> <li>1. Year 1 – EL will participate in state assessment – results will not be used for accountability calculations/determinations</li> <li>2. Year 2 – ELs will participate in statewide annual assessment – only growth scores will be included in accountability calculations/determinations</li> <li>3. Year 3 and beyond – ELS will participate in statewide annual assessment – achievement and growth scores will be included in accountability calculations/determinations</li> </ol> <p>(page 46)</p>
<i>Strengths</i>	
<i>Weaknesses</i>	One peer reviewer selected N/A because he/she was unclear about the state’s decision.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No (0 peer reviewers) <input checked="" type="checkbox"/> Not applicable (1 peer reviewer)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	IN should clarify its intention to exempt recently arrived ELs from its state assessments. If no, IN must revise its rationale to communicate and support its intention.

**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>	Through collaboration and consultation with teachers, principals, school leaders, parents, and organization, IN selected minimum group sizes based on including as many students as possible, avoiding masking students’ performance, and ensuring sizes are statistically sound. For accountability purposes, the minimum group size is 20 for all determinations. IN did not identify an accountability group size for each student group. (pages 44-46)

<i>Strengths</i>	An ESSA workgroup consisting of teachers, principals, school leaders, parents, and representatives from stakeholder interest groups and organizations was charged with helping the state determine the appropriate N-size. The workgroup considered the previous N-size under the state’s ESEA waiver. They also considered the need to include all students in the accountability system while at the same time not setting it too low as to skew the perception of the performance. Ultimately, it was recommended that the minimum N-size be set at 20 for accountability purposes and at 10 for all student and subgroup reporting purposes.
<i>Weaknesses</i>	While, IN’s plan included a rich description of its process for determining minimum group size for accountability for the all student group, it failed to mention the group size for each subgroup. The peers inferred the accountability group size for each subgroup is 20.
<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>	IN must identify its subgroup accountability group size. If the group size is 20, IN must clearly communicate its accountability group size for subgroups.

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

➤ Is the selected minimum number of students statistically sound?<sup>2</sup>

	<i>Peer Response</i>
<i>Peer Analysis</i>	IN’s plan provides a description of the discussion the working group had regarding the statistical soundness of the minimum student group size for the accountability indicators, yet most peer reviewers found the plan lacks evidence to show stakeholders selected a statistically sound accountability group size. (page 44-45)
<i>Strengths</i>	IN selected a minimum N-size of 20 that is supported by the Institute of Education Sciences January 2017 report, “Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information”. The selected minimum N-size of 20 is low enough to be inclusive and is an increase from what was used under ESEA.

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

	Stakeholders were involved in the determination of group size and grappled with the balance between inclusion and data privacy and settled on 20.
<i>Weaknesses</i>	There is no mathematical modeling to support the validity or reliability of either of the presented group sizes although IN purports its usage of Institute of Education Sciences January 2017 report, “Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information” when determining group size.
<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>	Three reviewers note that IN must demonstrate it implemented a methodology (e.g. mathematical modeling) to support the statistical soundness of its accountability group size of 20. See peer reviewers’ notation A4.ii.e regarding privacy of student data.

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>	Through collaboration and consultation with teachers, principals, school leaders, parents, and organization, as well as guidance from National Center for Educational Statistics 2011 report, IN selected minimum group sizes based on including as many students as possible, avoiding masking students’ performance, and ensuring sizes are statistically sound. For accountability purposes, the minimum group size is 20 for all determinations. (page 45)
<i>Strengths</i>	A variety of stakeholders were included in the discussions – teachers, principals, school leaders, parents, representatives from stakeholder interest groups and organizations, and the state board of education. Numerous meetings were held with these stakeholders to discuss minimum group sizes.  IN’s plan provides two different descriptions of the discussion of the same working group regarding concerns and considerations used to determine the minimum N size for student groups in the accountability system.
<i>Weaknesses</i>	The plan provides a brief description of the persons or groups who collaborated in the working group to identify group sizes. However, it lacks details showing persons with statistical expertise were involved in the conversation and provided technical support to stakeholders to help them understand the impact that various group sizes have on accountability and privacy of student data.
<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</i>	

<i>an SEA must provide to fully meet this requirement</i>	
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A.4.ii.d: Minimum N-Size and Ensuring Student Privacy(ESEA section 1111(c)(3)(A)(iii))

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	Albeit IN reported implementing National Center for Educational Statistics 2011 best practices for establishing minimum group size, it does not provide sufficient evidence in its plan to show its accountability group size of 20 protects the privacy of individual students. (pages 46-47)
<i>Strengths</i>	The state said it followed, in part, NCES guidelines in selecting its accountability group size.
<i>Weaknesses</i>	The plan does not directly address the privacy of individual students being maintained with a minimum group size of twenty. The plan does, however, indicate more schools will meet the N=20 minimum group size since the accountability system rolls data for multiple grade levels in a school.
<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>	IN must provide information as to the process they used to protect the privacy of individual students. IN's process minimally must include a description for how a sound methodology of N=20 protects the privacy of individual students.

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>	Through collaboration and consultation with teachers, principals, school leaders, parents, and organizations, as well as guidance from National Center for Educational Statistics 2011 report, IN selected minimum group

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

	sizes based on including as many students as possible, avoiding masking students' performance, and ensuring sizes are statistically sound. The reporting group size for all students and each student group is 10. The plan clearly identifies the differences in minimum student group size for reporting versus inclusion in the accountability system. However, IN does not provide sufficient evidence in its plan to show its reporting group size protects the privacy of individual students. (page 47)
<i>Strengths</i>	IN's plan indicates results reporting will be done for a minimum student group size of N=10 while the accountability indicators will use a minimum student group size of N=20.
<i>Weaknesses</i>	The plan indicates a minimum group size of N=10 for reporting has been a standard practice in the state for years. The plan also cites the use of a 2011 report from the National Center for Educational Statistics to help identify minimum group sizes, yet it provides no details from the report to indicate why N=10 for minimum group size respects privacy and provides statistical reliability.
<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>	IN must provide information as to the process they use to protect the privacy of individual students. IN's process minimally must include a description of a sound methodology for reporting data of N=10 protects the privacy of individual students.

#### 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>	IN's long-term achievement goal is to close its student achievement gap in English/language arts and mathematics for all subgroups by 50 percent by 2023. IN's six-year long-term (from 2016-2017 to 2022-2023) goals are presented by grade level: grade 3-8 and grade 10. Ambitious goals are listed for all students and each subgroup share the same timeline. The annual improvement for each student group is based on their baseline or starting

	point, which results in lower achieving students needing to show greater annual improvement to meet the long-term goal. IN notes in its plan that as they administer new assessments, new assessment baseline data may require adjustments to the long-term goals. (pages 13-14)
<i>Strengths</i>	<p>IN spelled out how it determined its long-term goal. IN’s achievement goals will include students who have been enrolled at 90% of the school year (table heading).</p> <p>IN provided tables with clear ELA and mathematics long-term goals, to be achieved by 2023, for eleven different student groups using the current assessment in two different grade level groups, grades 3-8 and grade 10. The state will be adjusting the long-term goals to reflect the results of the new state assessments to be implemented in 2019.</p> <p>IN provides a rationale for not setting a common proficiency endpoint in that it would be a disservice to both struggling students and high-achieving students in that it would be ambitious but likely not achievable given the six year timeframe.</p>
<i>Weaknesses</i>	The plan’s description of the gap closure calculation (p. 13) would be more transparent if step 3 was to divide the difference from step 2 by 2, or multiply by one-half, rather than dividing the result by 50%. Note: The illustrated calculation example in the text box is multiplying by 50%.
<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.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>	IN included measurements of interim progress goals in Appendix A, table(s) A. Goals are presented by test, grade band, all students, and each subgroup. The inclusion of the historical performance of each student group allows stakeholders the opportunity to consider the feasibility of attaining the long-term goals and interim progress targets for this plan. (pages 146-147)
<i>Strengths</i>	
<i>Weaknesses</i>	<p>One peer reviewer noted the plan does not provide information about how the interim progress targets were calculated.</p> <p>IN did not explain why there was a decline in performance when comparing 2015 to 2014 data. The peer reviewers believe the decline is a result of the shift to the common core assessments. Thus, there is a concern that</p>

	accountability measures may be negatively affected when new tests are administered.
<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.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>	Academic achievement goals are included in Appendix A, Tables A on pages 146-147. The expected increase for each group of students is based on their individual baseline performance, which means lower performing students have higher improvement rates expectations to close achievement gaps.
<i>Strengths</i>	IN acknowledges that certain subgroups will have to grow at larger intervals than higher-achieving subgroups to meet the goals of closing the achievement gap by 50 percent in six years. IN addressed this requirement in the narrative on page 14, using the African American subgroup as an example of needing to increase proficiency by 3.9 percent per year under the new goal. In this example, IN referenced historical data that the maximum amount the African American subgroup has grown since 2010 is 2.19 percent.  When the new state assessments are administered, IN will establish a new baseline (page 14).
<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.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>	IN identified and described its long-term four-year adjusted cohort graduation rate goal on pages 14-17. IN’s aim is to close its four-year adjusted cohort graduation rate gap for all subgroups by 50 percent by 2023. Goals established for all students and each student group use 2016-2017 graduation rates as their baseline. Although the goals are calculated for each student group in the same way, the expected increase for each group of students is based on their individual baseline performance. This means lower performing students have greater improvement rate expectations to close their achievement gaps.
<i>Strengths</i>	<p>The plan provides tables with clear four-year cohort graduation rate long-term goals, to be achieved by 2023, for eleven different student groups (p.17). The table includes 2016 baseline data.</p> <p>IN’s graduation data for accountability purposes from this point forward will be calculated without the General Diploma information.</p> <p>The goal is ambitious for certain subgroups; i.e. Special Education but may not be ambitious enough for the higher-achieving subgroups; i.e. the Asian subgroup. IN has set a common goal for all students and subgroups of closing the graduation rate gap by 50 percent by 2023. In setting this goal, IN acknowledges that subgroups that currently (2016-2017 is the baseline year) have lower graduation rates will need to improve at higher rates during the six-year timeline; e.g. the Special Education subgroup would need to show a 28.1 percent increase by 2023 which is an average of 4.68 percent per year as compared to the Asian subgroup which would need a 7.6 percent increase by 2023 or 1.27 percent per year (p 16).</p>
<i>Weaknesses</i>	<p>The plan’s description of the graduation rate goal calculation (p. 13) would be more transparent if step 3 was to divide the difference from step 2 by 2, or multiply by one-half, rather than dividing the result by 50%. Note: The illustrated calculation example in the text box is multiplying by 50%.</p> <p>The plan, in this section, mentions the assessment system is changing in 2019, yet provides no information on how or if this will impact graduation rates (p. 17). The plan also references new federal expectations, yet does not provide any details of those new expectations to justify the need to adjust the four-year graduation rate long-term goals.</p>
<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</i>	

<i>meet this requirement</i>	
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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>	IN states it will include five-year adjusted cohort graduation rate improvement as part of its graduation rate indicator in its accountability determination. Peer reviewers found this discussion to be confusing. This confusion may have resulted from the use of a different ESSA template. IN is encouraged to clearly communicate how it will determine and use its extended cohort graduation rate in its accountability determination. Even though there is a five-year adjusted cohort graduation rate improvement measure, IN does not use the measure to establish an independent long-term goal. (pages 34, 38-39)
<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"/> Not applicable (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.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>	IN included in its plan interim four-year adjusted cohort graduation rate goals for all students and each subgroup in Appendix A, table B, page 148. There are no long-term nor interim progress goals for the extended-year adjusted cohort graduation rate or graduation improvement rate. (pages 38-39)
<i>Strengths</i>	The state provides measurements of interim progress toward the long-term goals of the four-year adjusted cohort graduation rate for all students as well as for each subgroup of students.
<i>Weaknesses</i>	One peer reviewer noted that the plan does not provide information about how the interim progress targets were calculated.
<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.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>	IN’s four-year adjusted cohort graduation rate goals are calculated for each student group in the same way, the expected increase for each group of students is based on their individual baseline performance. IN’s goal of closing the graduation gap by 50 percent over the next six years is for all students and all student subgroups and includes the baseline data for 2016-2017 for each of these. Each has a different starting point (baseline) but each is expected to reduce the gap by 50 percent. This means lower performing groups of students have greater improvement rate expectations to close their achievement gaps. There is no information about the five-year adjusted cohort graduation rate. (pages 16-17, 38-39, 148)
<i>Strengths</i>	The long-term goals and interim progress considers the improvement necessary for subgroups of students who are behind to meet these goals.  IN’s plan shows clear differences in the baseline performance of each student group and provides the data for stakeholders to calculate the various changes for each student group that shows the initial lower performing student groups are expected to show larger graduation rate gains for both the long-term goals (pp. 16-17) and the interim progress targets (pp. 148).
<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>	
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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>IN will track interim progress through their annual growth-to-target measure of which the details were not included in the plan.</p> <p>Stated on page 18, IN has adopted the WIDA ACCESS 2.0 for ELLs as the state assessment for English language proficiency. The state will use a growth-to-target model for accountability. By 2023, 63% of Indiana’s English learners (as determined by 2015-2016 baseline data) will achieve English language proficiency (page 19). IN will revisit the 63.0% target after they have implemented the WIDA ACCESS 2.0 assessment for a few more years. Given that 26% of English Learners achieved English language proficiency in the baseline year, this seems a suitable ambitious target.</p>
<i>Strengths</i>	<p>The state identifies a six-year goal such that 63 percent of EL students are proficient. Given that 26 percent of students achieved proficiency in the baseline year, this seems a suitable ambitious target. As additional WIDA ACCESS 2.0 data are available, the state reserves the right to adjust the long-term goal after it has at least three years of WIDA Access 2.0, with new standard setting, available.</p> <p>The state’s expectation of a 37%-point increase from 2016 to 2023 in the percent of English Learners who are achieving English language proficiency is aligned to its statewide long-term goal of reducing the non-English proficient rate of English learners in half by the end of the 2022-2023 school year. (page 40)</p>
<i>Weaknesses</i>	IN did not provide the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency.
<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</i>	Although IN has its long-term language proficiency attainment goal, IN must include in its plan the long-term goal for increases in the percentage of English

<i>or clarification that an SEA must provide to fully meet this requirement</i>	learners making progress in achieving English language proficiency.
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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>	IN’s plan on pages 18 and 148 clearly defines a set of interim progress targets for the percentage of ELs expected to make progress toward English language acquisition within six-years, consistent with federal guidelines. The plan indicates the long-term goal and subsequently the interim progress targets will be adjusted when the state has three years of WIDA ACCESS 2.0 results.
<i>Strengths</i>	Measurements of interim progress are provided based on WIDA ACCESS 2.0’s proficiency levels. The table shows a consistent 3% increase from 2017 through 2023. (page 148)
<i>Weaknesses</i>	IN does not provide information on the calculation of the interim progress targets for English language acquisition.
<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.iv: Indicators (ESEA section 1111(c)(4)(B), 1111(c)(4)(E)(ii))

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

A.4.iv.a: Academic Achievement

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

- Can the indicator be disaggregated for each subgroup of students?
- Is the indicator measured by grade-level proficiency on the annual statewide reading/language arts and mathematics assessments?
- Does the indicator measure the performance of at least 95 percent of all students and 95 percent of all students in each subgroup?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>IN will use the same academic achievement indicators. Measures will be calculated for all students and each subgroup of students. The ISTEP+ or ISTAR assessment in math and English language arts will be used to determine proficiency.</p> <p>Participation rate is used to determine a multiplier. If participation rate is 95% then the proficiency rate's multiplier is 1. If not, the multiplier is less than 1 and based on the actual participation rate.</p> <p>The language arts and math score are weighted equally in the overall achievement indicator. IN recognizes that the state's new assessment that will be administered 2018-2019 will impact validity and reliability. (pages 38-39)</p>
<i>Strengths</i>	<p>Sample determination calculation were described or modeled in the plan. IN states on page 35 there is a school enrollment requirement for students' data to be included for accountability purposes.</p> <p>The plan describes the Academic Achievement Indicator as the product of the school's proficiency rate (percentage students passing state accountability assessment or alternate assessment and enrolled 90% of school year) and participation rate (based in students enrolled during testing window). It is the product of two percentages. Each of the factors can be disaggregated by student groups in the state accountability system and used to calculate an Academic Achievement Indicator for student groups meeting the minimum student group size of N=20. The equal weighting of ELA and mathematics for the final score will provide a combination of both contents.</p>
<i>Weaknesses</i>	<p>The plan addresses the validity and reliability of the state adaptive accountability assessments for ELA and mathematics (p. 36), but does not address the validity and reliability of multiplying the percent proficient and the participation rate, especially when the participation rate is rounded to 1 if the school's rate is equal to or greater than 95%.</p> <p>Additionally, a score can be calculated for each student group meeting the minimum student group size, but there is no information to suggest how these separate scores are combined or used together or if the composite score is valid and reliable.</p> <p>IN's long-term goal is based on academic proficiency; however, the achievement indicator includes proficiency and participation rate.</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</i>	IN must strongly show that each of the academic accountability measures are valid and reliable as well as the composite indicator. Moreover, IN must

<i>or clarification that an SEA must provide to fully meet this requirement</i>	ensure the composite indicator is based on the state’s long-term goals.
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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>Stated on page 36-37, IN’s academic progress is based on student growth for grades 4 through 8. Growth measures are determined and reported by all students and by each subgroup. The measure is based on a “growth-to-proficiency” model for each student.</p> <p>IN uses student growth percentile ranking based on peer group performance (similar previous year’s achievement performance). Using a student’s prior year’s status and an observed growth score, the state will award points on a scale of 50 to 175 in three different categories of low movement, standard movement, or high movement. (pages 36-37)</p>
<i>Strengths</i>	<p>Academic progress for grades 4-8 is measured by growth to standard, with points assigned based on prior year status. The state does not use an averaging procedure across years.</p> <p>The grades 4 through 8 growth measures appear to be sound. Sample calculation formulae were included in the plan on page 38. A growth model can be extremely beneficial in a state accountability system, especially in the lower grades.</p> <p>The plan’s description of the calculation for the Other Academic Indicator shows the calculation is the same for all elementary and secondary, not serving grade 12, schools. The defined Other Academic Indicator can be disaggregated for any student group meeting the minimum size of N=20.</p>

<i>Weaknesses</i>	<p>While a growth model can be beneficial, the way IN described theirs on pages 36-37 was very confusing. A clearer explanation needs to be provided for stakeholders to understand it.</p> <p>IN's plan would benefit from more technical information about how growth measures for grades 4 through 8, especially with the administration of a new test in school year 2018-2019 are determined. IN should include a discussion on how middle school advanced math will be included in the accountability growth measure.</p>
<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.iv.c: Graduation Rate

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>IN's graduation rate indicator is based on the state's four-year graduation rate and its five-year graduation rate improvement. The combined score produces its graduation rate indicator. The plans explain how four- and five-year adjusted cohort graduation rates will be used in accountability. A description and formula were provided for the four-year graduation score and the five-year improvement score (pages 38-39). There was not sufficient evidence to show</p>

	the measure is valid or reliable. A 90% graduation rate goal has been established.
<i>Strengths</i>	<p>IN is using both graduation cohorts in its accountability plan. A sum of the two graduation scores will produce an overall graduation rate indicator score.</p> <p>IN describes a Graduation Rate Indicator that is the sum of two different values, the graduation rate percentage of the most recent four-year adjusted cohort and the change from the four-year to the five-year graduation rates of the previous adjusted cohort. The calculation assumes the sum will be weighted more by the most recent four-year adjusted cohort graduation rate than the prior cohort.</p> <p>Graduation rates can be disaggregated by all subgroups and will be reported as such but are not included in the accountability determination.</p>
<i>Weaknesses</i>	<p>The 90% graduation rate threshold takes precedence each year over the interim progress target or the long-term goal for 2023. The plan does not show how its determination of the graduation rate score is valid and reliable.</p> <p>The plan’s explanation of the use of the graduation qualifying exam in the determination of the 10-12 improvement score is confusing. It is unclear of the state’s use of the 10-12 improvement score. (page 38) The peer reviewers also noted that the 10-12 improvement score will be phased out according to page 37. IN should clarify the use and purpose of the score. Some peer reviewers had many questions about the methodology and the type of test used.</p> <p>IN’s plan does not include long-term and interim progress goals for its graduation rate indicator that will be used to effectively determine the difference in performance between high schools.</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>IN’s long-term goal is based solely on the adjusted cohort four-year graduation rate. The state must provide long-term/interim goals for its composite graduation rate indicator score. The plan must also show that the methodology for determining this indicator and its five-year adjusted cohort graduation rate improvement measure are valid and reliable.</p> <p>IN must justify the lack of the interim progress targets and/or the long-term goal in the Graduation Rate Indicator or provide a revised the indicator or provide the long-term goals and interim progress targets.</p>

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>	IN will measure progress toward English language proficiency using the WIDA ACCESS 2.0. The state will use ACCESS 2.0 composite score for its growth-to-target of proficiency within a maximum of six years (pages 39-40). IN will use a growth-to-standard model to measure student achievement using the WIDA ACCESS 2.0 beginning in the 2017-2018 school year. Scoring a Level 5 or 6 on the WIDA ACCESS 2.0 defines proficiency. The validity and reliability evidence are available for this indicator through the WIDA Access work.
<i>Strengths</i>	The state describes progress towards meeting ELP in its statewide accountability system through statewide participation in WIDA ACCESS 2.0 which has begun this school year. The state creates a growth to standard target based on prior performance and any students that meet or exceed the target are counted towards the school’s ELP score. Additionally, a student who measures as proficient on WIDA (score of 5 or more) is also counted as proficient. So, the calculation is the (% of ELPs meeting/exceeding the growth target + the # attaining proficiency)/total # of ELs.
<i>Weaknesses</i>	IN has used four different English language assessments over the past four years and, as such, longitudinal data will not be available for a few years. The state will re-evaluate the indicator as more data becomes available.  IN did not discuss how it used conversion data from WIDA to generate expectations for growth.
<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.iv.e: School Quality or Student Success Indicator(s)

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>IN has school quality/student success indicators for elementary, middle, and high schools. The plan describes on pages 40-43 these indicators. The indicators can be used to differentiate school performance.</p> <p>a) The K through 8 school quality/student success indicator is based on attendance as a measure to reduce chronic absenteeism (students that miss <math>\geq 10\%</math> of the days enrolled). All absences are used in the determination. The target for this indicator is at 80% of the students is absent <math>&lt;10\%</math> of the days enrolled. From page 42, the attendance indicator will include a combination of attendance data: persistent attendance – students with an average attendance rate of 96 or greater; improved attendance – students who increase their previous year’s attendance by at least 3%.</p> <p>b) IN claims the high school indicator is based on research as well as state statute. IN aims to promote high school students’ college and career readiness. IN’s goal for the indicator is that at least 25% of four-year graduates demonstrate college or career readiness.</p>
<i>Strengths</i>	<p>The state defines chronic absenteeism as missing (excused and unexcused) 10 percent of more of enrolled days during the school year. Chronic absenteeism is a statewide data point that is used for students in grades K-8 with the justification that poor attendance in the early grades creates a snowball effect in later grades. The state reframes the indicator into a positive by defining a “model attendee”, defined either as a student who attends 96 percent or more of the enrolled days OR a student who attends at least 3 percent more school days than the prior year. The state’s overall target is that 80 percent of students meet this goal. The methodologies for the school quality/student success indicators included calculation examples. The state’s methodologies also appear to be fair.</p> <p>The indicator for grades 9-12 considers how many four-year graduates 1) earned passing score on IB or AP exam; 2) earned 3 college credits; or 3) earned an approved industry certification. State law already requires each school to provide at least two dual credit courses. The state goal is that 25 percent of graduates meet one of these criteria, so the calculation is the number of students that meet one of these criteria/total number of graduates x 25%.</p> <p>Notably, the state intends in the future to replace the attendance indicator with a school climate and culture assessment that first requires testing and state board approval.</p>

	IN also considered a third measure – climate and culture – however, decided to hold off on including this in the accountability system until an appropriate measure of such has been identified.
<i>Weaknesses</i>	<p>IN’s plan does not provide strong evidence of the validity, reliability, or comparability of the measures. There is no preliminary data analysis to justify the addition of these School Quality/School Success Indicators to the cumulative score will result in enhanced differentiation of schools.</p> <p>There are significant concerns that the state may not be able to guarantee equal opportunity to meet at least one of the college/career ready metrics and that the overall target for student readiness is low.</p> <p>School Quality/School Success Indicator described in the SEA ESSA plan is distinctly different between the elementary/middle schools and high schools. The elementary/middle school measure is a Chronic Absenteeism value while the high school measure is about course completion. These differences may make the overall differentiation score distinctly different for these different school levels and not comparable. IN’s plan lacks evidence to show the Chronic Absenteeism impacts a significant number of students in schools and impacts student’s academic performance in elementary and middle schools.</p> <p>IN’s plan indicates the state will study, and potentially develop, a culture and climate assessment, yet provides no evidence to show how it will potentially be linked to improving student learning and instruction. The plan does not provide a timeline for completing the study, implementing an assessment, and incorporating the indicator in the differentiation score for schools.</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>Elementary/Middle  IN must provide data or evidence to show the Chronic Absenteeism indicator is a valid and reliable measure of School Quality/School Success for elementary/middle schools. IN must also show that the indicator will result in meaningful differentiation when data are disaggregated by all students and each subgroup.</p> <p>High School  IN must show that its School Quality/School Success measures and indicator for high school are valid and reliable as well as will result in a comparable measure for all grade arrangements for high school.</p>

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

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

- Does the SEA describe its system of meaningfully differentiating, on an annual basis, all public schools in the State?
- Is the State’s system of annual meaningful differentiation based on all indicators in the State’s accountability system?
- Does the State’s system of annual meaningful differentiation include the performance of all students and each subgroup of students on each of the indicators in the State’s accountability system?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>IN states it uses a letter grade system that is based on a 0 to 100-point scale. Grades assigned as follows:</p> <p>90-100 = A  80-89 = B  70-79 = C  60-69 = D  0-59 = F</p> <p>The school's summative score is based on an aggregated score from all weighted indicators. Summative ratings will be calculated for "all students" group and for each subgroup, and all data will be published on the state's department of education dashboard. (pages 33, 46-49)</p> <p>IN includes all its public schools in its accountability system. Accountability for schools that do not meet traditional settings were included in its plan. (pages 50-51)</p>
<i>Strengths</i>	<p>The state's system of annual meaningful differentiation includes the performance of all students and each subgroup on each of the indicators in the accountability system. Each indicator receives its own 0-100 score, which is then weighted based on established weights by grade span, and assembled into a composite score which is then converted into a summative rating of A-F.</p> <p>IN's system of annual meaningful differentiation is clear.</p>
<i>Weaknesses</i>	<p>For many of the "non-testing" indicators, subgroup data are reported but not included in the accountability calculation (graduation rate, absenteeism, college/career readiness). It is not clear that each subgroup performance on indicators will be used to determine school or LEA accountability.</p> <p>IN's plan makes general statements about the aggregated differentiation score without providing details to clarify the calculations of the score. The plan also lacks information to justify that the aggregation of the different indicators will result in a meaningful set of scores (letter grade) for differentiation the performance of all 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>IN's plan must ensure that each subgroup of students for each of the indicators are included in its accountability system.</p>

#### A.4.v.b: Weighting of Indicators

- Does the SEA describe the weighting of each indicator in its system of annual meaningful differentiation, including how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students (e.g., for the Progress in Achieving English Language Proficiency indicator)?

- Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators each receive substantial weight individually?
- Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators receive, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>IN graphically represents its weights for its K-8 and 9-12 accountability components. If a measure does not have a score, the weight will be redistributed among other categories. The plan lacks information on how the individual indicator scores are converted from their various initial values to the weighting. (pages 46-49)</p> <p>a) Grades 3-8: Academic Progress = 42.5%; Academic Achievement = 42.5%, ELP = 10%; Chronic Absenteeism (SQSS) = 5%. If there is not an ELP subgroup, the 10% will be equally distributed to Academic Progress and Academic Achievement.</p> <p>b) Grades 9-12: Academic Achievement = 15%; Academic Growth/Improvement = 15%; Graduation Rate = 30%; ELP = 10%; College &amp; Career Readiness (SQSS) = 30%. The weight for any missing indicator(s) will be redistributed to the other weights in the same ratio.</p>
<i>Strengths</i>	<p>The state provides an overview on how the weights are assigned and calculated. When indicators are missing, the state recalibrates by distributing the weight of the missing indicator to the other indicators in a way that maintains the overall ratio of weights. Academic indicators and ELP progress appropriately receive greater weight both individually and in the aggregate than SQSS indicators for grades 3-8. Weighting strategy was discussed at a work group on accountability.</p> <p>IN's plan describes the various stakeholder groups and their recommendations for weighting the different accountability indicators in the final differentiation score, including a graphic (p. 47) of the State Board's final decision. Thus, the final weighting, if all indicators are available for a school, is shown.</p>
<i>Weaknesses</i>	<p>IN's plan provides information on specific weighting of indicators when all indicators are available for grade 3-8 and grades 9-12 but the plan lacks information on how the individual indicator scores are converted from their various initial values to the weighting. The plan needs to give attention to the range of scores available for each of the indicators to justify how their conversion is calculated. Inclusion of the initial conversion of the individual indicators is necessary to create a transparent plan for stakeholders; the plan would be strengthened with example conversions for each indicator of a sample school.</p> <p>The plan does not provide specific details on how weighting is adjusted when accountability indicators are missing.</p> <p>IN meets the requirement that the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency</p>

	indicators in the aggregate receive more weight than the SQSS indicator; however, IN should consider the perception of the low weights assigned to the academic achievement and academic growth indicators at the high school (grades 9-12) level. A peer reviewer has concerns about the high academic achievement weight for ES/MS and the low academic achievement weight for high school. IN should conduct a deeper analysis of the weights (that includes possible points earned for each indicator) to ensure no school or groups of students are negatively impacted.
<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>	One reviewer recommends that IN's plan should provide a clear outline or table that shows the changes in the weighting of indicators when an indicator is missing for a school.

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>	IN's plan describes five different alternative ways to earn a school letter grade in the state's accountability system based on the grade configurations of the school or the type of students being served. Reported on page 49-50, IN will assign a letter grade to schools that serve only K-2 students based on 3 <sup>rd</sup> graders' academic performance at the testing school site. The K-2 schools receive Addressing Chronic Absenteeism Indicator and the English Language Proficiency Indicator when possible. IN uses grade-band weights to determine a final accountability score for schools with variant grade configurations. IN has a different accountability system for adult high schools – performance is based on the Graduation Rate Indicator and a College and Career Readiness Indicator. Newly opened schools have an option for three years to use all indicators or the academic progress indicator score for their accountability measure (pages 49-51).
<i>Strengths</i>	IN identified five different types of schools requiring a different methodology for analyzing their differentiation score. The plan's identification of all these different school configurations indicates the state is working to ensure all schools are included in the school 'grading' system.
<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)

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>IN will use the letter grade “F” to identify failing schools (page 51); the summative accountability F scores range from 0 to 59.9 points (page 33). Title I schools that receive an “F” letter grade (on the state’s rating scale of A-F) or fall within the lowest-performing 5 percent of all Title I schools will be identified as Comprehensive Support and Improvement Schools. IN will use the 2017-2018 data to initially identify these schools in the 2018-2019 school year. This will be the only year that one year of data will be used; three years of data will be used in subsequent years (p 51).</p> <p>Lowest-performing schools will be based on the lowest 5% of all Title I schools. IN will annually rank all Title I schools based on an average of three years of points earned. The first-year identification will only include data from 2017-2018. During the 2018-2019 school year, IN will identify its lowest performing 5% of Title I school. There appears to be no differentiation between elementary, middle, or high schools. (page 51)</p>
<i>Strengths</i>	<p>A school is identified for comprehensive support if the school receives a F grade and/or falls within the lowest five percent of Title I schools based on average total points earned over the past three years. The first year of identification will be 2018-19 drawing on 2017-18 school data.</p> <p>IN will publish annually a list of “at-risk” schools – these are the bottom 6 to 10% of all Title I schools based on average total points earned on the accountability system over the past three years.</p>
<i>Weaknesses</i>	<p>The plan would be transparent with the addition of detailed procedures for calculating the three-year averages used to identify the schools. An application of the procedures to prior year data would also clarify stakeholders’ understanding of the methodology.</p> <p>The plan does not provide information on the distribution of Title I schools</p>

	in the two different grade level spans (grades 3-8 and grades 9-12) to justify the inclusion of all schools earning a school letter grade ‘F’ as well as determining the lowest 5% of Title I schools. IN did not provide any anticipated data related to how many schools would fall in the “F” rating as opposed to how many schools are in the lowest 5 percent. This would have been helpful information.
<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>	One peer reviewer stated that IN must provide a justification and its methodology for assigning letter grades for a given year and then using a three-year average of the differentiation scores to identify the lowest performing Title I schools.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	High schools with low graduation rates will be identified for CSI if their three-year averaged four-year adjusted cohort rate is 67% or less. The identification applies to non-Title I and Title I schools. Schools will be identified annually. The first identification will occur in 2018-2019 using 2017 graduation rates. (pages 51-52)
<i>Strengths</i>	For schools with an average four-year high school graduation rate over the past three years of lower than 67 percent, that school is automatically identified for comprehensive support. Schools will be identified annually beginning in 2018-19 school year. The state will also publish a list of at-risk high schools whose annual four-year adjusted cohort graduation rate is between 68 and 70 percent.
<i>Weaknesses</i>	The plan provides criteria/rules for identifying high schools whose graduation rates are low, but lacks detailed procedural steps describing the calculations needed for identifying the schools. The identification of low graduation rate schools is based on a three-year average of the four-year adjusted cohort graduation rates, but lacks details on the procedures for averaging the three years of data.
<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</i>	One peer reviewer note that IN must provide a step-by-step procedure, which

<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	may include detailed sample calculations for calculating the three-year average graduation rate for each school to identify schools that are below the 67% graduation rate threshold.
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A.4.vi.c: Comprehensive Support and Improvement Schools—Additional Targeted Support Not Exiting Such Status

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	IN described on page 52 the state’s methodology for identifying schools that need additional support because they failed to meet exit criteria. These schools’ identification is based on “whether it has one or more subgroups with an overall accountability score, which includes all required indicators, at or below the lowest performing 5 percent threshold that was used to identify schools for comprehensive support and improvement”. Identification begins in the 2022-2023 school year and will use data from the previous five school years (2017-2022).
<i>Strengths</i>	Three reviewers note the state’s methodology will use data from 2017 to 2022 to identify TSI schools that failed to meet exit criteria and need additional support through CSI. These schools have one or more subgroups performing at or below the 5% threshold.
<i>Weaknesses</i>	It would be useful if IN would use clear terminology consistently and accurately when referencing “chronically” and “consistently” underperforming.  No explanation was given as to why the state is waiting for five years to identify these schools.
<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>	One reviewer notes IN must clearly describe the methodology for TSI schools that need additional targeted support are identified.  IN must also revisit the use of terms “additional target support” “chronically” and “consistently” underperforming schools and ensure the identification of these schools are plainly communicated.

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>	IN states on pages 51 to 53 the frequency of CSI schools. The plan indicates schools will be identified for comprehensive support and improvement annually beginning in the fall of 2018. IN will identify all three (lowest performing, low graduation rate, chronically underperforming subgroups) on an annual basis.
<i>Strengths</i>	<p>The state will identify schools in need of comprehensive support annually, beginning in 2018-19. The plan indicates the low performing 5% of Title I schools and the high schools with low graduation rates will be identified annually starting in the fall of 2018, thus meeting the requirement of identifying the schools every three years.</p> <p>The plan also indicate the identification of schools needing additional targeted support due to not meeting exit criteria from the low performing schools categories above will be identified annually starting in the fall 2022 and continue annually thereafter.</p>
<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>	IN’s definition of a “consistently underperforming” subgroup is one with an overall accountability score at or below the lowest performing 5 percent threshold that was used to identify schools for comprehensive support and improvement for at least two consecutive school years (page 53). The overall accountability score includes all required indicators of the accountability system. Schools in this category will be identified annually beginning in 2018-2019.

<i>Strengths</i>	Three peer reviewers noted IN’s methodology was sufficient.
<i>Weaknesses</i>	One reviewer noted the state’s description of their methodology lacks business rules for identifying “consistently underperforming” schools.  It would be useful if IN used clear terminology consistently and accurately when referencing “chronically” and “consistently” underperforming.
<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>	One peer reviewer noted IN must provide a detailed methodology for identifying “consistently underperforming” schools.  IN must provide a clear definition or description of the state’s definition of “consistently underperforming” schools.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	IN’s response on page 53, indicate the state will identify TSI schools based on a school having one or more subgroups with an overall accountability score, which includes all required indicators, at or below the lowest performing 5% threshold used to identify schools for comprehensive support and improvement. The overall accountability score includes all required indicators of the accountability system. Schools in this category will be identified annually beginning in 2018-2019, and annually thereafter.
<i>Strengths</i>	Two peer reviewers found the state’s methodology to be acceptable by identifying one or more subgroups with an overall accountability score at or below the lowest performing 5 percent threshold used to identify schools for additional targeted support.
<i>Weaknesses</i>	IN’s plan does not provide a detailed methodology for identifying schools needing additional targeted services for a specific student group inclusive of all schools in the state, not limited to Title I schools. There is no mention of using averaged data.
<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>	Two reviewers state IN must provide a clear methodology for identifying additional targeted support schools. The methodology could include samples, table, or charts that ensures stakeholders have a clear understanding of how these schools are identified.
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A.4.vi.g: If Applicable, Additional Statewide Categories of Schools

- If the State chooses, at its discretion, to include additional statewide categories of schools, does the SEA describe those categories?

	<i>Peer Response</i>
<i>Peer Analysis</i>	Not applicable
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input type="checkbox"/> No (0 peer reviewers) <input checked="" type="checkbox"/> Not applicable (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.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>	IN employs the 95% participation rate for its Academic Achievement indicator. Participation rate is used to determine a multiplier. If participation rate is 95% then the proficiency rate's multiplier is 1. If not, the multiplier is less than 1 and based on the actual participation rate (pages 35 and 49). IN will include only students enrolled for at least 192 days (90% of the schoolyear) in its academic achievement, academic progress, and chronic absenteeism indicators; and long-term goal determination (page 49).
<i>Strengths</i>	The participation rate is incorporated into the academic achievement indicator. For schools where participation falls below the 95 percent threshold, the proficiency rate is multiplied by the annual participation rate which effectively lowers the academic score.

	IN is holding schools accountable for not having at least 95 percent of their students participating in the state assessments.
<i>Weaknesses</i>	This penalty for participation rates less than 95% may not be sufficiently severe in cases where schools narrowly miss participation targets.
<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>CSI schools’ exit criteria are listed.</p> <ul style="list-style-type: none"> <li>a) CSI school has earned a letter grade <math>\geq</math>C for two consecutive years and</li> <li>b) CSI school must demonstrate its capacity to sustain progress (improvement plan, goals, strategies, monitoring, funding)</li> </ul> <p>Schools identified as comprehensive support and improvement schools will exit such status after two consecutive years of gaining a “C” letter grade (70—79 points) or higher on the statewide accountability system. The schools must also have a plan for sustainability describing how it will maintain the progress it has made over the years. (page 52)</p>
<i>Strengths</i>	<p>To exit comprehensive support status, the school must achieve a C or higher grade for two consecutive years (which effectively removes the school from the bottom five percent). The school must also demonstrate a sustainability plan with goals, strategies and progress monitoring. Exit criteria are clearly focused on academic and student outcomes.</p> <p>The plan requires schools in comprehensive support and improvement to meet the exit criteria within four years of identification. Otherwise, the state intervenes with more rigorous interventions (page 60).</p>

<i>Weaknesses</i>	<p>The plan shows no alignment between the exit criteria and the long-term goals, or interim progress targets, identified for academic achievement or graduation rates because exit criteria are based on “letter grades”, which is the school’s final composite accountability score.</p> <p>IN requires schools in comprehensive support and improvement to earn a letter grade of C or higher on the annual school accountability rating system, yet it provides no evidence to indicate this letter grade is sufficient to ensure the school is not in the bottom 5% of Title I schools in those years.</p>
<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>	<p>One peer reviewer note that IN must justify the selection of a school grade of C or higher that ensures the school is no longer in the lowest 5% of Title I schools.</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>On page 53, TSI schools’ exit criteria are listed.</p> <ul style="list-style-type: none"> <li>a) TSI school has earned a letter grade <math>\geq</math>C for two consecutive years and</li> <li>b) TSI school must demonstrate its capacity to sustain progress (improvement plan, goals, strategies, monitoring, funding)</li> </ul> <p>The plan describes multiple exit criteria from additional targeted support services, but does not provide data to justify the selection of a school grade of C or higher to ensure the school no longer has a subgroup performing as poorly at or below the lowest 5% of Title I schools. The state should consider reviewing and revising the exit criteria to include the schools meet the interim progress targets or long-term goal. (page 53)</p>
<i>Strengths</i>	<p>To exit targeted support status, the school must attain a “C” letter grade or higher for two consecutive years and demonstrate a strong sustainability plan that includes a theory of action, goals, aligned strategies and progress</p>

	<p>monitoring plan. Schools have five years from identification to meet these exit criteria after which they will be identified for comprehensive support if they are unable to exit.</p> <p>IN gives additional targeted support TSI schools five years to meet the exit criteria. IN requires exiting schools to have a sustainability plan which addresses the school’s theory of action, measurable goals, strategies, and progress monitoring.</p>
<i>Weaknesses</i>	<p>Because only some of the indicators on the state accountability system reflect the performance of subgroups, there is a concern that a school could show sufficient progress on its overall score such that it exits status but neglect to move the specific group of students that has been targeted for improvement.</p> <p>The plan shows no alignment between the exit criteria and the long-term goals, or interim progress targets, identified for academic achievement or graduation rates because exit criteria are based on “letter grades”, which is the school’s final composite accountability score.</p> <p>IN requires schools in additional targeted support to earn a letter grade of C or higher on the annual school accountability rating system for the student group which qualified them for the support, yet provides no evidence to indicate this letter grade is sufficient to guarantee the school is not in the bottom 5% of Title I schools in those years for the identified subgroup.</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>IN must provide a sound rationale for using the “C” accountability grade as its TSI exit criteria. IN should also include mathematical modeling that shows schools earning points in a variety of ways is a feasible way for schools to shift from an “F” to a “C” and does not mask low student achievement, especially the performance of each subgroup.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Schools that fail to exit comprehensive support and improvement status within four years will be subject to interventions by the Indiana State Board of Education as outlined in House Enrolled Act 1638 (as described on pages 60-61). The Indiana State Board of Education will hold at least one public hearing within the school’s district to gain input from stakeholders. Interventions can range from merging the school with another, higher performing school to closing the school and several options in between. The State Board will determine the final intervention(s) that is(are) the most impactful and</p>

	<p>appropriate for the school. Stated on page 60, IN will implement more rigorous interventions for CSI schools that do not exit within four school years.</p> <p>Intervention listed are:</p> <ul style="list-style-type: none"> <li>a) merging schools with nearby higher performing schools</li> <li>b) assigning a special management team to operate all or part of the school;</li> <li>c) approving the school district’s plan to improve the school through the creation of a transformation zone;</li> <li>d) approving the school district’s plan to improve the school through the creation of an innovation network school;</li> <li>e) implementing IDOE’s recommendations for improving the school;</li> <li>f) implementing other options for school improvement expressed at the public hearing; and</li> <li>g) closing the school</li> </ul>
<i>Strengths</i>	<p>IN has a range of options for schools that fail to meet the exit criteria. They also involve community stakeholders in discussions about the final intervention(s).</p> <p>The state will award planning grants to schools in their first year, intended to support a needs assessment, school improvement plan and ensure conditions are in place (leadership, academic strategy, student supports) for implementation to occur. The state also provides planning supports. Each school and LEA is expected to differentiate its grant request based on identified needs. Interventions must be evidence-based. For districts with four or more support schools, the state will offer a multiple-school improvement grant to create a large-scale initiative such as a transformation zone. And for those districts that have already met the planning objectives, the state will permit them to request a multi-year implementation grant directly. Once the planning objectives are met, the district may apply for a one or two-year implementation grant. There is a clear theory of action backing this approach.</p>
<i>Weaknesses</i>	<p>The state should consider an intensive process for building local capacity, with teacher engagement, that focuses on a series of quick wins for achieving short-term goals of student achievement. The work should emphasize implementation of evidence-based instructional strategies that have resulted in significant positive student learning and instruction.</p> <p>The SEA ESSA plan lists infrastructure changes that will be consider by the State Board for schools who do not meet exit criteria within four years of identification, not evidence-based instructional strategies for improving learning. The plan references the use of a needs assessment, including a root cause analysis, connected with State Board decisions on interventions to be implemented; however, it is not evident that the needs assessment and subsequent actions are sufficiently comprehensive and will lead to identification of root causes and interventions that will reduce or eradicate low student performance.</p>
<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</i>	<p>One peer reviewer states that IN’s plan must present comprehensive data-driven decision making process with root cause analysis to select rigorous interventions that will lead to the improvement of low student achievement or</p>

<i>clarification that an SEA must provide to fully meet this requirement</i>	graduation rates.
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A.4.viii.d: Resource Allocation Review (ESEA section 1111(d)(3)(A)(ii))

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>IN mentions on page 61 that periodic reviews of resource allocation will occur within LEAs with one or more CSI or TSI schools. Review of per pupil spending; access to and investment in pre-K; distribution of effective, certified, and experienced staff; and students’ access to advanced coursework.</p> <p>IN will review the resource allocations for all comprehensive support and improvement and targeted support and improvement schools with examination of per pupil spending, access to high-quality kindergarten, distribution of staff, and access to advanced coursework. Indiana has not determined the frequency in which the resource allocations will occur. (page 61)</p>
<i>Strengths</i>	<p>The state commits to reviewing per pupil spending, access to high quality pre-k, distribution of effective staff, and access to advanced coursework to determine if CSI and TSI schools are adequately leveraging resources.</p> <p>IN’s review of resource allocations includes several areas other than just per pupil spending.</p>
<i>Weaknesses</i>	<p>The plan would be strengthened by including timelines for the development and dissemination of a resource allocation review process that would provide data across schools and potentially districts to guide interpretation of local school/district data. The plan indicates the state has not defined a process for reviewing resource allocation or the frequency with which an external entity will carry out the process.</p> <p>The plan does not discuss how the uniqueness of each school and district will be integrated into the resource allocation review. The plan does not discuss building local school district capacity to conduct their resource allocation review, rather than needing an external entity to do the work. The results of the resource allocation review should be incorporated with the ongoing yearly comprehensive needs assessment to ensure implementation of rigorous interventions can be carried out efficiently.</p> <p>IN must show a commitment to conducting frequent and ongoing resource allocation reviews. IN should also ensure that any school or LEA that receives school improvement grants has annual resource allocation reviews. For schools not under review, IN is encouraged to have written guidance with technical support available for the schools to conduct at least a “desktop review” of the allocation of their resources.</p>

<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>	IN's plan must ensure there is a resource allocation review process that can be implemented by each district and/or school as needed as part of their comprehensive needs assessment, rather than waiting for an external entity to find time to conduct the process. IN must also ensure schools and LEAs are fully aware of how resources are available and assigned for usage.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>IDOE's framework for providing technical assistance to schools is described on pages 56-60. The required actions for CSI and TSI schools listed are aligned to many best practices implemented by turnaround schools.</p> <p>The technical assistance Indiana will provide to LEAs with schools identified for comprehensive or targeted support and improvement is described in detail on pages 56-60. Using an excellent Theory of Action, the SEA will provide a research-based model of school improvement for the LEAs to use; they will require evidence-based interventions; they will share best practices and resources throughout the state; they will assist in organizing targeted professional learning opportunities; they will differentiate professional learning; and they will collaborate with other technical assistance providers to ensure the LEAs are successful. (page 56-60)</p>
<i>Strengths</i>	For districts with four or more support schools, the state will offer a multiple-school improvement grant to create a large-scale initiative such as a transformation zone and other supports/resources. And, for those districts that have already met the planning objectives, the state will permit them to request a multi-year implementation grant directly. Once the planning objectives are met, the district may apply for a one or two-year implementation grant. There is a clear theory of action backing this approach. Focus is on evidence based interventions and differentiated planning and technical assistance.
<i>Weaknesses</i>	The technical assistance emphasizes infrastructure, rather than instruction and student learning. The technical assistance is described in isolated processes to be completed sequentially, rather than integrated into an overall vision of school improvement.
<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</i>	

<i>an SEA must provide to fully meet this requirement</i>	
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A.4.viii.f: If Applicable, Additional Optional Action

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Stated on pages 56-60, IN proposes to provide differentiated support for CSI and TSI schools. School improvement grants will be made available to support schools during their first year to plan and prepare for school improvement; help schools/districts operationalize effective practices; aid schools/districts in identifying and implementing evidence-based strategies. The use of grant funds will be based on schools/district success. Implementation grants are available for districts that demonstrate improvement.</p> <p>Comprehensive Support and Improvement Schools that do not meet the exit criteria within four years will be considered persistently low-performing schools and subject to interventions by the Indiana State Board of Education as outlined in Enrolled Act 1638. At least one public meeting will be held in the district where the school is located to gather stakeholder feedback as to what interventions should take place. Interventions range from merging the school with a high-performing school to closing the school and several options in between (as described on pages 60-61). The Indiana Board of Education will make the final determination of the intervention(s).</p> <p>Targeted School and Improvement Schools that do not meet the exit criteria within five years of identification will be identified for comprehensive support and improvement. (page 53)</p>
<i>Strengths</i>	<p>The state notes that, in the case of CSI schools that fail to exit within four years, the state board of education may request a hearing to consider options such as merging with a higher performing school, assigning a management team, creating a transformation zone, closing or improving the school.</p> <p>There are a range of interventions for the Indiana State Board of Education to consider and stakeholder input is required. However explicit information pertaining to this criterion was not included in the plan.</p>
<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</i>	

*clarification that an SEA must provide to fully meet this requirement*

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The plan provides disproportionality data related to student access to quality teachers among students of different economic status and race/ethnicity. The plan provides a discussion of the interpretation and root causes of the significant disproportionality in the state. (pages 79-86)</p> <p>IN has provided, on page 79, the rates in which students in schools receiving Title I, Part A funds are being taught by ineffective teachers, out-of-field teachers, and inexperienced teachers. Low income and minority students, in every category, are taught at a higher rate of these teachers. Indiana publicly reports this data on the Educator Equity webpage of the department.</p>
<i>Strengths</i>	<p>The state defines ineffective (based on evaluation of practice and student learning), out of field, and inexperienced (first or second year teacher). The state provides data on the level of disproportionality for low-income and minority students in each category. And the state commits to publicly reporting these data each year. Finally, the state considers the root causes of these data and proposes strategies in each area, along with expected impact by year.</p> <p>IN conducts data and root cause analyses to identify disproportionality. Improvement strategies were developed in partnership with LEAs and review of best practices and current research. IN also included key definitions on page</p>

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

	78-79.
<i>Weaknesses</i>	The plan provides summary statistics of disproportionality without the raw number of teachers involved in each teacher group. The plan also discusses the root cause of lower retention rates of effective teachers in schools with high poverty and high minority proportions, yet does not provide data about retention rates of teachers.
<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.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>Pages 87 to 109 describes IN’s support for improving school conditions for student learning. IN proposes multiple approaches: academic support, health and wellness, community and environment, and social and emotional. IN described on pages 107-108 their efforts to support LEAs in improving school conditions for student learning. Efforts include the collection of data as required by state statute, a School Safety Academy, and professional development opportunities held throughout the school year. No details were given as to the professional development opportunities, so it is difficult to determine if the state is adequately assisting LEAs in this area. Overall, this area was lacking in specificity.</p> <p>The SEA ESSA plan provides a description of an action plan to help schools improve conditions expected to lead to improved school climate and increased student achievement. The description identifies separate actions for each of the three components required, rather than an integrated approach.</p>
<i>Strengths</i>	<p>State code requires every district to have a policy prohibiting bullying from their school (p102), and provide training to district employees. The state offers sample policies and training tools.</p> <p>IN offers a tiered approach to help LEAs create and sustain positive and supportive learning environments that promote student learning.</p>

	<p>The SEA ESSA plan outlines a multi-tiered support system to be available statewide for use by schools to address bullying/harassment, overuse of discipline practices that remove students from the classroom, and reduce use of aversive behavioral interventions.</p> <p>The Consolidated Plan mentioned that the Indiana Department of Education will partner with local, regional, and state entities to promote existing organizations that train educators on crisis prevention intervention but mainly in regard to assisting with funding. Again, no specifics were given.</p>
<i>Weaknesses</i>	<p>IN provides no evidence to justify the need for the actions outlined for each of the components. Few of the actions listed have scientific research to show implementation will change student learning in a positive way.</p> <p>IN did not provide any specifics as to how it is assisting LEAs with this critical requirement of improving school conditions for student learning by reducing bullying and harassment, reducing the overuse of discipline practices that remove students from the classroom, and reducing the use of aversive behavioral interventions that compromise student health and safety.</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>IN's plan must provide data to justify and support its actions or tools mentioned in this section. Moreover, IN must include its response how the state support LEAs in each of the listed four criteria for this requirement.</p>

### 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>From pages 90 to 92, IN describes infrastructure characteristics of high school course offerings covering a diverse set of postsecondary options available to students and gives no attention to the development of life-long 21<sup>st</sup> century skills for success. The plan provides a brief description of evolving early childhood education in the state with a reference to alignment between pre-k learning standards and kindergarten content standards, yet lacks details on how services support students' non-academic needs when transitioning from pre-k to primary learning opportunities. IN's plan provides an extensive list of isolated programs for specific student groups, which may or may not support student transitions, but the plan does not provide a cohesive structure for leveraging resources across grades and</p>

	<p>student groups to effectively support student transitions, both academically and non-academically.</p> <p>IN is also supporting students with disabilities through the State Personnel Development Grant from the US Department of Education to improve school transitions and post-school outcomes for these students. They also partner with the Indiana Family and Social Services Administration, Division of Disability and Rehabilitative Services to coordinate transition activities for students with disabilities. (pages 92-95)</p>
<p><i>Strengths</i></p>	<p>IN provides a broad spectrum of supports for LEAs that receive Title I funds. The state offers support for the transition from middle school, including parent presentation, and school counseling competencies. All sixth graders must complete an initial graduation plan, which is then updated in grade 9 and every year thereafter. There are specific resources to help English Learners and school counselors. The state addresses early learning transition, helping students with disabilities and the transition from high school to postsecondary.</p> <p>The plan describes high school course options with an emphasis on career readiness. The plan focuses on ‘pathways to postsecondary success’ starting with sixth graders developing a graduation plan and revising it every year in grades 9 through 12 such that students are encouraged to participate in high school courses focused on developing employability skills or earning advanced credit for studying content knowledge.</p> <p>IN’s plan describes support for students with disabilities to transition across grades with a strong advocacy program and partnership with external organizations to meet the student’s evolving individual needs.</p>
<p><i>Weaknesses</i></p>	<p>IN provided very little specific information as to how the state works with LEAs to provide effective transitions of students to middle and high school to decrease the risk of students dropping out. They do require all sixth-grade students to create a graduation plan that is then updated in grade 9 and every year thereafter. No specifics were given as to how the plans are created, what program they use, if parents are involved, which staff members oversee the plans, interventions for students who are not on target, etc. The plan provides no information on how the state is supporting student transitions from primary to upper elementary grades or upper elementary to middle school grades, years when the development of metacognition is crucial. The plan focuses on infrastructure to support transitions, but lacks attention to supporting students’ social and emotional needs as they mature and are confronted with more challenging learning environments.</p> <p>IN did not specifically describe how they address effective transitions of student to middle and high school to decrease the risk of students dropping out. The plan lacks information on supporting transitions of students from primary to upper elementary grades.</p> <p>The plan needs to ensure it focuses on evidence-based interventions with significant impact on student learning.</p>

	The plan describes various measurement tools being used for gathering data, but lacks details on how these tools support student transition within and from pre-k learning opportunities to primary learning opportunities.
<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>	IN must provide a clear set of integrated state actions, inclusive of all grades PreK-12, that describe how IN will provide comprehensive support to LEAs with school transitions and dropout prevention. IN’s plan further must provide information on a comprehensive and cohesive plan for transitioning across different grade level spans which addresses both academic and non-academic needs of students using evidence-based interventions with significant impact on student learning.

## 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>	IN’s plan for statewide entrance and exit procedures for English learners is described on pages 120-121 of the Consolidated Plan. Any student identified through the Home Language Survey as having a language other than English will be screened using the W-APT or WIDA Screener within 30 days of enrollment or within two weeks of enrollment if the student enrolls after the start of the school year. Students receiving a composite score below 5.0 will be identified as English learners.
<i>Strengths</i>	<p>The state screens based on home language survey using a state-approved English proficiency exam. Scoring a 5.0 on the WIDA exam is considered proficient. Each LEA submits an English Learner plan coupled with data collection.</p> <p>IN’s plan indicates all schools use a Home Language Survey, the WIDA English language screener, and the WIDA Access 2.0 (or its alternative assessment for student with disabilities when appropriate) to identify students needing support in English language acquisition. All districts/schools use the same entrance and exit thresholds.</p> <p>The state is a member of the WIDA consortium.</p>
<i>Weaknesses</i>	IN’s plan provides no information on the technical support it provides to all schools to certify the administration of assessments and analysis of results is

	completed with fidelity to ensure consistency of identification of students needing support in English language acquisition.
<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.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>Stated on pages 122-123, IN conducts state meetings with EL teams – meetings include training/professional development, review of data, and provisions for technical support. IDOE also offer support to families, school/district leaders, school boards, and communities that offer guidance on how to best support ELs. IDOE also makes available an EL guidebook. The plan identifies ways districts/schools and state EL program staff interact to address instructional and program needs through professional development opportunities and potential changes in resources.</p> <p>IDOE holds an annual training session for all new and returning EL and Title III directors; they have established an EL Leadership stakeholder group that meets throughout the year; they’ve created an EL Guidebook; and have partnered with other agency divisions to coordinate guidance and messages. The state has adopted the WIDA English Language Development Standards which work in conjunction with the Indiana College and Career Ready standards.</p>
<i>Strengths</i>	<p>The state collects data of performance on WIDA and then creates a state plan for PD and technical assistance. Schools that fall under the state goal or are not on track based on growth to proficiency rates receive pd and targeted technical assistance. The state trains EL directors, has an EL guidebook, offers specific guidance in areas like assessment and differentiated instruction, and bases PD off the WIDA English language development standards. Many of these resources/guides are also available for use with parents as they learn how to support their children in the learning environment.</p> <p>The plan indicates the state EL program experts meet regularly with EL district/school leaders to determine their current concerns and needs related to student learning and program implementation. The state EL program experts work to respond to those needs through coaching and professional</p>

	development opportunities.
<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>IDOE conducts onsite and desktop fiscal and program monitoring for LEAs that receive Title III funds. IDOE EL teams visit schools to conduct training and to help LEAs implement and monitor their EL improvement plan. IDOE will partner with LEAs to train staff to conduct outcome-focused program evaluations, which will aid in identifying progress toward meeting goals. The state's EL program experts work to integrate their understanding of quality EL programming with the broader work of school improvement for all students under Title I. (page 124)</p>
<i>Strengths</i>	<p>The state conducts onsite and desktop fiscal and programmatic monitoring of all federal grant programs, along with on-site monitoring for LEAs identified through Title III risk assessment. The state offers some vague description of further technical assistance if funded strategies are not effective.</p> <p>The plan indicates the EL program experts are collaborating with staff delivering comprehensive and target support to low performing Title I schools and high schools with low graduation rates to provide both holistic strategies for improving student learning as well as meeting individualized EL program needs for the identified schools.</p> <p>IN listened to their stakeholders regarding the need for additional support in evaluating the effectiveness of English learner programs. The department will work with LEAs to provide training on outcome-focused program evaluation.</p>
<i>Weaknesses</i>	The state did not provide any specifics as to how they assist LEAs that are not effective with the English learner programs.
<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</i>	

*an SEA must  
provide to fully meet  
this requirement*