

STATE PLAN
PEER REVIEW CRITERIA
Peer Review Panel Notes Template

STATE: Kentucky



U.S. Department of Education

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

A.1: Challenging State Academic Standards and Assessments

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>In Kentucky, students take a mathematics assessment at the high school level as required under section 1111(b)(2)(B) of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESSA). The content area assessment for mathematics at the high school level is an Algebra II end-of-course assessment; however, the State Educational Agency (SEA) does not specify the high school level courses available for grade 8 students.</p> <p>The 2017-18 Testing at a Glance table on page 34 indicates that the Algebra II assessment will be administered as a field test. The SEA has not specified what assessment they administer or will administer for 8th graders taking high school credit courses.</p> <p>The SEA indicates that they provide math specialists to support teacher leaders</p>

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

	and administrators to lead the redesign of instruction, classroom assessment, and course designs. In addition, the local School-Based Decision Making (SBDM) councils, made up of parents, teachers and administrators, set school policy and make decisions, and the SEA offers the Kentucky Model Curriculum Framework (KMCF) as a facilitation guide in decision making.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	<p>Kentucky is in a state of transition with regard to end-of-course testing in mathematics and other subjects. Kentucky will develop and field test in the spring of 2018 a new end-of-course test in Algebra II. Algebra II is considered the State’s high school mathematics assessment.</p> <p>The SEA does not clarify which high school level math course 8th grade students would be taking, nor what assessments those students would be taking (Algebra II or grade 8 math test), nor if the assessment is aligned to the high school math content the students would be receiving.</p> <p>While the SEA describes the State’s Model Curriculum Framework as its uniform method of letting the Local Educational Agencies (LEAs) know what is expected of them in each subject area, it does not describe its specific strategies to provide all students in the State the opportunity to be prepared for and take advanced mathematics coursework in middle school. The framework “provides a rationale for the need to revisit curriculum planning, offers background information and exercises to generate “future oriented” thinking, and suggests a process for designing and reviewing the local curriculum” (page 35).</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>	The SEA should clarify what course is taken by 8 th grade students taking a high school level course, what assessment is used, if the assessment is currently administered, and what the implementation timeline is for the proposed system. The SEA should also define the strategies that it will use to provide opportunities for all students to take advanced course work in middle 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>	The SEA defines languages other than English that are present to a significant extent in the participating student population on page 36 as 5%, but based on the School Year (SY) 2016-2017 data, no language meets the 5% threshold (Spanish is the highest at 2.4%). The SEA indicates that if a home language meets the 5% threshold, a committee of educators and stakeholders will convene to discuss the need for development of summative content area assessments in the home language.
<i>Strengths</i>	The SEA describes the discussions it has had with teachers and other stakeholders about determining this definition.
<i>Weaknesses</i>	<p>The SEA’s definition does not meet the requirement because it does not include the most populous language other than English.</p> <p>The Peers recommend that the SEA provide a definition that includes at least the most populous language other than English spoken by the State’s participating student population (i.e., Spanish). The Peers recommend that the SEA describe how it considered languages other than English that are spoken by distinct populations of English Learners (ELs), including ELs who are migratory, ELs who were not born in the United States, and ELs who are Native Americans. The SEA should also describe how it considered languages other than English that are spoken by a significant portion of the participating student population in one or more of the State’s LEAs, as well as languages spoken by a significant portion of the participating student population across grade levels.</p>
<i>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>The SEA should provide a definition that includes at least the most populous language other than English spoken by the State’s participating student population (i.e., Spanish).</p> <p>The SEA should describe how it considered languages other than English that are spoken by distinct populations of ELs, including ELs who are migratory, ELs who were not born in the United States, and ELs who are Native Americans. The SEA should also describe how it considered languages other than English that are spoken by a significant portion of the participating student population in one or more of the State’s LEAs, as well as languages spoken by a significant portion of the participating student population across grade levels.</p>

A.3.ii: Existing Assessments in Languages other than English

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA states on page 37 that it does not provide any assessments in languages other than English.
<i>Strengths</i>	The SEA states that if/when a specific language group of students reaches 5% of the EL population, it will review with stakeholders the process to develop appropriate testing in that language.
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.3.iii: Assessments not Available and Needed

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA states on page 37 that no plans are in place to develop an assessment and, should a language meet the SEA’s criteria, a team would review the data to determine the need for a native language assessment.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	Based on the SEA’s current definition, the SEA does not identify or produce any assessments in languages other than English. When the SEA changes its definition to meet the requirements, the SEA will need to address the assessments needed in Spanish.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA should revise its response to this requirement after updating its definition of “significant extent.”

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>	The SEA indicates on page 37 that they will convene a committee of educators and stakeholders to discuss the need to develop assessments in other languages if a home language meets the 5% minimum in section 3.i.
<i>Strengths</i>	The SEA provides a number of testing accommodations and supports for ELs in accordance with regulation 703 KAR 5:070, Inclusion of Special Populations in the State-Required Assessment and Accountability Programs.
<i>Weaknesses</i>	Based on the SEA’s current definition, the SEA does not identify or produce any assessments in languages other than English and currently does not have any plans to develop assessment in other languages. When the SEA changes its definition to meet the requirements, the SEA will need to address the assessments needed in Spanish.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA will need to revise its response to this requirement after updating its definition of “significant extent.”

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA lists on page 38 each major racial and ethnic group that it includes as a subgroup of students in its accountability system.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	While the National School Lunch Program (NSLP) eligibility is often a marker for economic disadvantage, the SEA proposes this as a subgroup instead of

	<p>economically disadvantaged. A recent reading of the NSLP documents leads peers to question the legality of this subgroup. The SEA should re-label its FARM subgroup as Economically Disadvantaged subgroup in accordance with the NSLP guidelines and the ESSA requirements.</p> <p>The SEA should also strike the language “who have an Individual Education Plan (IEP)” when describing student with disabilities in accordance with 1111(c)(2) of ESEA and IDEA regulations to parallel other federal language around children with disabilities.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA’s accountability system also includes a Consolidated Student Group, a non-duplicated aggregation of student groups, often too small to be reported separately as described on page 38.
<i>Strengths</i>	The Consolidated Student Group attempts to include every student in the school and LEA accountability scores.
<i>Weaknesses</i>	The SEA should strike the language “who have an Individual Education Plan (IEP)” when describing student with disabilities in accordance with 1111(c)(2) of ESEA and IDEA regulations to parallel other federal language around children with disabilities.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA chose option 2 on page 38.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

- Does the SEA provide the minimum number of students that the State determines is necessary to meet the requirements of any provisions under Title I, Part A of the ESEA that require disaggregation of information by each subgroup of students for accountability purposes, including annual meaningful differentiation and identification of schools?
- Is the minimum number of students the same State-determined number for all students and for each subgroup of students in the State (i.e., economically disadvantaged students, students from each major racial and ethnic group, children with disabilities, and English learners) for accountability purposes?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA indicates on page 39 that it will use a minimum n-size of 10 for each and all groups and subgroups, which is in alignment with its accountability plan. The SEA indicates this factor operationalizes transparency and continues the historical standard for reporting.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA explains on page 39 the rationale for setting the minimum n-size at 10 and plausibly meets the research/statistical requirements.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	The SEA does not provide any data analysis to support sound statistical decision making.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA makes a convincing argument for its selection of n-size, given the number of very small LEAs within the State, as shown in the chart on page 41. The SEA indicates that it involved groups from the Commissioner-led Town Halls in the spring of 2016 and 2017 which included multiple work groups and committees in determining the minimum n-size (page 40). The SEA notes that several groups discussed the minimum n-size and increasing it from 10 to 30, but the data showed that increasing the n-size would decrease the number of groups available for reporting so the n-size was kept at 10.

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

<i>Strengths</i>	The SEA does describe its discussions with several groups of stakeholders, involving Commissioner-led Town Halls in the spring of 2016 and 2017, online surveys and multiple work groups and committees.
<i>Weaknesses</i>	It would have been helpful to see percentages run for secondary grade levels for the graph on page 41.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA indicates on page 41 that it has a policy to protect the privacy of individual students in reporting achievement results, and after taking requirements of the FERPA into consideration and consulting with the National Technical Advisory Panel on Assessment and Accountability, they determined that 10 is a reasonable balance. The n-size the SEA chose is in keeping with the literature on this issue.
<i>Strengths</i>	The SEA has policies in place and requires each reported subgroup to have 10 students at each grade tested within a school or LEA. Kentucky determined, “after consultation with its National Technical Advisory Panel on Assessment and Accountability (NTAPAA) and other commissioner’s advisory groups, that using a minimum N of 10 represents a reasonable balance of FERPA requirements, the public need to examine subpopulation performance and research/statistical requirements for reliability.”
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this</i>	

³ See footnote 5 above for further guidance.

<i>requirement</i>	
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A.4.ii.e: If Applicable, Minimum N-Size for Reporting

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA indicates on page 42 that it will use the same group size (n=10) for all student groups for both accountability and reporting.
<i>Strengths</i>	The SEA is to be commended for maintaining continuity by using the same minimum number of 10 for both accountability and reporting.
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA has established long-term goals to improve academic achievement, as measured by proficiency (percentage of students scoring proficient and higher on statewide reading and mathematics assessments), for all students and for each subgroup of students. The baseline is set for 2019, which reflects the first year of accountability; the long-term goal is to reduce the percentage of students scoring lower than proficient by 50% by no later than 2030 (encompasses one generation of students).

	<p>Additionally, the SEA also has a goal to reduce the gap between lower-performing student groups and higher-performing reference groups by at least 50% by 2030. The long-term goal is applicable for all students and each subgroup and it is differentiated by elementary, middle, and high school levels. The baseline was set as targets for SY2018-2019 using linear regression data from 2012-2016.</p>
<i>Strengths</i>	<p>The SEA provides patterns of relationships between current trends and long-term goals. The SEA set differentiated long-term and interim targets for elementary, middle, and high schools, which highlights the different proficiency levels for each school type group. The SEA also includes long-term and interim goals for Writing and Social Studies.</p>
<i>Weaknesses</i>	<p>The SEA did not include long-term and interim goals for science even though it indicates that they assess writing, science, and social studies, and science is included in the accountability framework. While not required, the SEA should consider adding the long-term and interim goals for science in Appendix A.</p> <p>One Peer noted that while the goals are ambitious, the 12-year timeline, beginning in 2019, may be longer than necessary.</p> <p>The SEA's current proposal uses possible future test performance as a baseline, which is not technically sound.</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 noted that the SEA should use actual data from a recent year as a baseline and should propose a shortened timeline that requires the all students group to make more than 2 percentage points progress per year. The SEA's current proposal uses possible future test performance as a baseline, which is not technically sound.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA provides long-term goals and measurements of interim progress toward meeting the long-term goals for academic achievement in reading and mathematics in Appendix A for elementary, middle and high school levels. The 2019-2030 charts are explicit, project academic achievement for all students including subgroups, and include measurements of interim progress for writing, social studies and combined content areas.</p>
<i>Strengths</i>	<p>The yearly increase expectations for language arts and mathematics are separated into elementary, middle, and high school charts.</p>
<i>Weaknesses</i>	<p>One Peer noted in the previous section the SEA mentions these numbers are placeholders. Since the baseline data used for these interim goals is from a year that has not occurred yet, interim goals are lacking due to the unavailability of baseline data.</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>	One Peer noted that the SEA should establish interim goals based on actual baseline data from a recent year. The SEA’s current proposal uses possible future test performance as a baseline, which is not technically sound.

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>	The SEA’s 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 by taking into account the greater gains that lower performing subgroups need to make in order to close the proficiency gaps.
<i>Strengths</i>	Each subgroup is treated individually, based on its own numeric gap, with its own interim targets and long-term expectations for growth.
<i>Weaknesses</i>	One Peer noted that since the baselines are based on extrapolated data, the argument for gap closure is weakened.
<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 noted that the SEA should establish interim goals based on actual baseline data from a recent year. The SEA’s current proposal uses possible future test performance as a baseline, which is not technically sound.

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA states that the long-term goal for the 4-yr Adjusted Cohort Graduation Rate (ACGR) is to reduce the percentage of students not graduating in 4 years by 50% from 2019 by 2030. The SEA also set a goal of reducing the gap between student groups with lower graduation rates and higher graduation rate reference groups by at least 50% by 2030. The goals apply to all students and each subgroup. The baseline was set as a target for SY2018-2019 using linear regression data from 2014-2016. More detail is provided in Appendix A.
<i>Strengths</i>	The long-term goals require reducing the percentage of students not graduating by 50% from 2019 by 2030. In addition, the gap between student groups with lower graduation rates and higher graduation rate reference groups will be closed by at least 50%.
<i>Weaknesses</i>	<p>One Peer noted that the SEA does not provide the actual baseline data from the most current year of graduates. The goals are described as reducing non-graduates by 50% over 12 years beginning in 2019 and are based on an extrapolated 2019 graduation rate. This weakens the response in this section.</p> <p>Another Peer noted that it is unclear as to whether or not the SEA is referring to the same cohort when they describe the 4-yr and extended 5-yr graduation rates. In Appendix A, the 4-yr ACGR for the Native Hawaiian or Other Pacific Islander subgroup is higher (95%) than the extended 5-yr ACGR (92.6%)—this is mathematically not possible if the SEA is referring to the 4-yr and 5-yr rates for the same cohort. The SEA should affirm the data for this subgroup in Appendix A.</p> <p>The long-term goals for White and Asian students appear to be quite modest.</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>	One Peer noted that the SEA should establish interim goals based on actual baseline data from a recent year, and shorten the implementation timeline. The SEA's current proposal uses possible future test performance as a baseline, which is not technically sound.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA states that its long-term goal for the extended 5-yr ACGR is to reduce the percentage of students not graduating in 4 years by 50% with a target of 96% from 2019 by 2030. They also set a goal of reducing the gap between student groups with lower graduation rates and higher graduation rate reference groups by at least 50% by 2030. The goals apply to all students and each subgroup. The baseline was set as a target for SY2018-2019 using linear regression data from 2013-2015. More details are provided in Appendix A.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	<p>One Peer noted that the SEA does not provide the actual baseline data from the most current year of graduates. The goals are described as reducing non-graduates by 50% over 12 years beginning in 2019 and are based on an extrapolated 2019 graduation rate. This weakens the response in this section.</p> <p>Another Peer noted that it is unclear as to whether or not the SEA is referring to the same cohort when they describe the 4-yr and extended 5-yr graduation rates. In Appendix A, the 4-yr ACGR for the Native Hawaiian or Other Pacific Islander subgroup is higher (95%) than the extended 5-yr ACGR (92.6%)—this is mathematically not possible if the SEA is referring to the 4-yr and 5-yr rates for the same cohort. The SEA should affirm the data for this subgroup in Appendix A.</p> <p>The long-term goals for White and Asian students appear to be quite modest.</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 noted that the SEA should establish interim goals based on actual baseline data from a recent year, and shorten the implementation timeline. The SEA's current proposal uses possible future test performance as a baseline, which is not technically sound.</p>

A.4.iii.b.3: Measurements of interim progress

- Does the SEA provide measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate for all students?
- Does the SEA provide measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA provides interim progress targets for all students and each subgroup for both 4-yr and 5-yr ACGR in Appendix A.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	One Peer noted that the SEA does not provide the actual baseline data from the most current year of graduates. The goals are described as reducing non-graduates by 50% over 12 years beginning in 2019 and are based on an extrapolated 2019 graduation rate. This weakens the response in this section.

	Another Peer noted that it is unclear as to whether or not the SEA is referring to the same cohort when they describe the 4-yr and extended 5-yr graduation rates. In Appendix A, the 4-yr ACGR for the Native Hawaiian or Other Pacific Islander subgroup is higher (95%) than the extended 5-yr ACGR (92.6%)—this is mathematically not possible if the SEA is referring to the 4-yr and 5-yr rates for the same cohort. The SEA should double check the data for this subgroup in Appendix A.
<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 noted that the SEA should establish interim goals based on actual baseline data from a recent year, and shorten the implementation timeline. The SEA’s current proposal uses possible future test performance as a baseline, which is not technically sound.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The long-term goals and interim progress targets take into account the greater gains that subgroups with lower graduation rates need to make in order to close the graduation rate gaps. The SEA also set a goal to reduce the graduation rate gap by at least 50% by 2030 with a target of 96%.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	One Peer noted that the SEA does not provide the actual baseline data from the most current year of graduates. The goals are described as reducing non-graduates by 50% over 12 years beginning in 2019 and are based on an extrapolated 2019 graduation rate. This weakens the response in this section.
<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 noted that the SEA should establish interim goals based on actual baseline data from a recent year, and shorten the implementation timeline. The SEA’s current proposal uses possible future test performance as a baseline, which is not technically sound.

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA states that its long-term goal for English language proficiency is to reduce the percentage of students who score lower than the level necessary to be declared proficient in English or who make progress less than being on track to be proficient by 50% by 2030. The baseline was set as a target for SY2018-2019 using data from 2012-2015, and the long-term goal targets are differentiated by elementary, middle, and high school levels.</p> <p>The SEA does not provide its definition of “being on track” and so the SEA’s calculations for long-term and interim goals do not incorporate such a definition. The State-determined timeline appears to be five years (page 48), with some students expected to take less time.</p>
<i>Strengths</i>	The differentiated targets at elementary, middle, and high school levels highlight the varying levels of EL proficiency rates at different grade levels.
<i>Weaknesses</i>	<p>The definitions for the goals are vague, which would indicate that every EL student either made enough progress to meet proficiency within that year, or made enough progress to be “on track” to meet English language proficiency within five years, at most. The term “on-track” described on page 48 is not clearly defined.</p> <p>One Peer noted that the SEA does not provide the actual baseline data from the most current year. The goals are described as reducing non-proficient EL students by 50% over 12 years beginning in 2019 and are based on an extrapolated 2019 data.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <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>The SEA should provide a clear definition of “on-track”.</p> <p>One Peer noted that the SEA should establish interim goals based on actual baseline data from a recent year, The SEA’s current proposal uses possible future test performance as a baseline, which is not technically sound.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA does not provide its definition of “on-track” and therefore this definition does not appear to be factored into the SEA’s calculations for long-term and interim goals. The State-determined timeline appears to be five years (page 48), with some students expected to take less time.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	Appendix A provides the numerical information about the interim and long-term goals for ELs, but there is no reasoning given to determine the numerical increases. One Peer noted that the SEA does not provide the actual baseline data from the most current year. The goals are described as reducing non-proficient ELs by 50% over 12 years beginning in 2019 and are based on an extrapolated 2019 data.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA should provide a clear definition of “on-track.” One Peer noted that the SEA should establish interim goals based on actual baseline data from a recent year. The SEA’s current proposal uses possible future test performance as a baseline, which is not technically sound.

A.4.iv: Indicators (ESEA section 1111(c)(4)(B), 1111(c)(4)(E)(ii))

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

A.4.iv.a: Academic Achievement

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA states that proficiency is its Academic Achievement indicator. The description does include how the SEA calculates the indicator consistently for all schools in all LEAs across the State. The SEA also provides a description of the weighting of reading and math achievement, although it does not address if the indicator includes a measure of student growth at the high school level. While the SEA indicates it uses a weighted average, there is no description of how it averages data across years and/or grades.</p> <p>The SEA’s response begins on page 51 with a discussion of proficiency as a percentage of students, but later discusses it as a weighted average giving values to students who score at certain levels. It is clear from the response that all schools will be held to the same standards, but it is not clear that each subgroup will be calculated the same way. The SEA’s response does not address the validity and reliability of its academic achievement indicator.</p>
<i>Strengths</i>	N/A
<i>Weaknesses</i>	<p>Based upon the description provided, it is difficult to determine the alignment to long-term goals and if the indicator measures the performance of at least 95 percent of all students and 95 percent of all students in each subgroup. Unfortunately, the reliability and validity of the indicator is not discussed (pages 51-52).</p> <p>The response does not clarify either the same goals for each subgroup nor the alignment to closing gaps. In addition, the SEA does not address the potential impact of weighting “distinguished students” higher than proficient, which could mask the number of non-proficient students.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <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>The SEA should clarify which will be used - percentage of proficient students or weighted index - for this indicator. The SEA should provide an assurance that the same measure is used for all subgroups, and provide numeric evidence that weighting does not mask non-proficient students in its accountability system. The SEA should also provide assurances of the validity and the reliability of the measure selected.</p>

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

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

- Does the SEA describe the Other Academic indicator used in its statewide accountability system for public elementary and secondary schools that are not high schools, including that the SEA uses the same indicator and calculates it in the same way for all elementary and secondary schools that are not high schools, in all LEAs, across the State, except that the indicator may vary by each grade span?
- Does the SEA describe, if applicable, how it averages data across years and/or grades (e.g., does the State use a uniform averaging procedure across all schools)?

- If the SEA uses a different indicator for each grade span, does it describe each indicator, including the grade span to which it applies?
- If the Other Academic indicator is not a measure of student growth, is the indicator another valid and reliable statewide academic indicator?
- If the Other Academic indicator is not a measure of student growth, does the indicator allow for meaningful differentiation in school performance?
- Can the indicator be disaggregated for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA’s accountability system includes four additional Academic Indicators for schools: the first one is Growth in Reading and Math, which is the growth each individual student makes over time that is measured by performance on tests administered annually (reading and mathematics) in the elementary and middle schools (grades 3-8). Reading and math are individually weighted 50% of the growth indicator score. Based upon the process described and the draft Growth Value Table presented, the SEA indicates that the procedure is valid and reliable, with meaningful differentiation for all students and subgroups.</p> <p>As indicated on page 53, the growth measure uses a tiered approach giving credit for raising low novice to high novice based on cutting achievement levels in half and then giving more credit for a student who is proficient and stays proficient than one who is novice high and stays novice high.</p>
<i>Strengths</i>	<p>The growth measure considers both where a student’s performance starts and how the student is moving toward the goal of proficiency. It includes a separation of a low and high category within the lowest student performance levels of Novice and Apprentice. The low and high division is made by separating the student performance level range in half. The growth each individual student makes over time is measured by performance on tests administered annually (reading and mathematics) in the elementary and middle schools (grades 3-8). Each student’s growth is assigned points on the basis of a value table on page 54. Growth in each subject is weighted equally.</p>
<i>Weaknesses</i>	<p>The validity and reliability of the growth measure are not established in the response. The growth system gives more weighting to a proficient student maintaining proficiency than for a high novice student maintaining high novice status, which could lead to the ability to mask the number of non-growing students and negatively impact the validity and the reliability of the measure.</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 noted that the SEA should provide data showing the impact of the weighting of growth, and information establishing the validity and reliability of the measure.</p>

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA’s accountability system includes four additional Academic Indicators for schools: the second one is science and social studies. The SEA statute</p>

	requires a criterion-referenced test in science and social studies that measures the depth and breadth of Kentucky's academic content standards to be administered once within the elementary and middle school levels. A standard setting process for each test determines the cut scores then a weighted indicator is used to create a separate other academic indicator score for both science and social studies at the equal weighting of 50%. The weighting gives more credit to distinguished students than proficient students.
Strengths	The inclusion of social studies and science in the SEA's accountability system is notable.
Weaknesses	The SEA does not address the potential impact of weighting "distinguished students" higher than proficient, which could mask the number of non-proficient students.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Two Peers noted that the SEA should provide data showing the impact of the weighting achievement levels, and information establishing the validity and reliability of the measure.

	Peer Response
Peer Analysis	The SEA's accountability system includes four additional Academic Indicators for schools: the third one is Transition Readiness. In Kentucky, transition readiness is defined by students having an acceptable composite score that combines performance in reading, mathematics, science, and social studies. A transition readiness percentage will be calculated for elementary and middle schools by dividing the number of students who have met a benchmark on a composite score that combines student performance on state-required tests in reading, mathematics, science, and social studies by the total number of students in the accountability group. This transition readiness indicator is based upon how the student scores on all tests; however, the acceptable level of performance has not been set.
Strengths	N/A
Weaknesses	The acceptable level of performance for this measure has not been set. The Peers question the value of this measure as part of the accountability system, since the transition measure for elementary and middle school grade levels are assessments that are already included in the accountability system.
Did the SEA meet all requirements?	<input type="checkbox"/> Yes (# peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA should provide the acceptable level of performance for this measure, which has not been set. The SEA should re-evaluate the value of this measure as part of the accountability system, since the transition measure for elementary and middle school grade levels are assessments that are already included in the accountability system.

	Peer Response
Peer Analysis	The SEA's accountability system includes four additional Academic Indicators for schools: the fourth one is Achievement Gap Closure. The SEA's accountability system includes two measures to provide a clear picture of how schools are closing the achievement gap for their students: 1) Gap to Group and 2) Gap to Proficiency. The SEA describes and validates an extensive calculation process, which culminates by combining the Gap to Proficiency and Gap to Group measures into an Achievement Gap Closure indicator score, which will be evaluated to produce a rating from low to high performance.
Strengths	The SEA demonstrates its focus on reducing the achievement gap.
Weaknesses	The gap measure appears to be somewhat intricate and does not explain how it will be combined into a total score for a school and district. The SEA does not provide any indication of validity or reliability of this measure. Additionally, the Peers are concerned that social studies and science are administered at one grade level in elementary schools and middle schools but weighted equally as the reading and math tests that are administered annually in grades 3-8.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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>	The SEA meets the requirements of this section, as it will calculate both 4- and 5-yr ACGR, tied to the long-term goal of cutting in half the gap between student subgroups by 2030. A description of that process is provided. It will be used for all high schools in the State and can be disaggregated by each subgroup. The measure appears to be reasonable, as it is based on the SEA's assessment system and long-term goals. The SEA is working towards including alternate assessment students earning a Kentucky alternate diploma in its graduation rates.
<i>Strengths</i>	The SEA's graduation rate indicator averages the 4- and 5-yr ACGR (page 60). The SEA intends to include alternate assessment students earning a Kentucky alternate diploma in its graduation rates and is working toward meeting the requirements to do so.
<i>Weaknesses</i>	The SEA does not specify that it uses the same process for every school. The SEA plans to average 4- and 5-year ACGR but does not specify how they will incorporate 4- and 5-year ACGR (lagging or spanning). The SEA should include the reliability and validity information.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iv.d: Progress in Achieving English Language Proficiency Indicator

- Does the SEA describe the Progress in Achieving English Language Proficiency indicator used in its statewide accountability system, including that the SEA uses the same indicator across all LEAs in the State?
- Is the indicator valid and reliable?
- Is the Progress in Achieving English Language Proficiency indicator aligned with the State-determined timeline described in A.4.iii.c.1?
- Does the indicator consistently measure statewide the progress of all English learners in each of grades 3 through 8 and in the grade for which such English learners are otherwise assessed under ESEA section 1111(b)(2)(B)(v)(I) during grades 9 through 12?
- Does the SEA's description include the State's definition of English language proficiency, based on the State English language proficiency assessment?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA describes the Progress in Achieving English Language Proficiency indicator in its statewide accountability system and applies the same indicator across all LEAs in the State. The SEA includes a thorough draft of the English Learner Growth Table showing observed growth based upon achievement on the English Language Proficiency assessment from two successive years. The more growth a student has made, the more points credited to the school. The SEA will continue its analysis and make adjustments accordingly. Kentucky plans to report English language progress separately when the minimum n-size

	is reached.
<i>Strengths</i>	Kentucky regulation, 703 KAR 5:070 provides the extensive definition of an EL. Kentucky’s English language proficiency assessment is the World-class Instructional Design and Assessment (WIDA) ACCESS 2.0. The English Language Acquisition value table on page 63 is helpful.
<i>Weaknesses</i>	<p>The validity or reliability of the growth measure is not provided. The SEA does not reference the EL proficiency growth alignment to the accountability timeline in A.4.iii.c.1.</p> <p>The Peers noted that the SEA’s English Language Acquisition value table does not take into account the variation of time it takes for a student learn the English language based on their starting proficiency level and the grade level (i.e., typically, younger students learn the language more quickly than older students). The SEA should consider utilizing grade level in producing a progress table.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA describes Opportunity and Access as its School Quality or Student Success indicator used in its statewide accountability system for all public schools in the State. The SEA has provided an extensive draft of the measures and metrics for calculating Opportunity and Access. The Opportunity and Access indicator will be calculated using the total number of points for the categories of Rich Curriculum, Equitable Access, School Quality and Whole

	Child Supports (pgs. 66-69). Students will also have the opportunity to earn a Kentucky Work Ethic Certification. The SEA recognizes the need to enhance its existing State student information system.
<i>Strengths</i>	<ul style="list-style-type: none"> • Rich curriculum, differentiated by ES, MS, and HS: <ul style="list-style-type: none"> ○ Inclusion of visual and performing arts, physical education, career exploration, cultural studies, CTE, etc. ○ Focus on college and career readiness is evident through the work ethic certification • Equitable access, differentiated by ES, MS, and HS: <ul style="list-style-type: none"> ○ Intent to focus on high achieving students is clear in the SEA’s response • School quality as measured by chronic absenteeism: <ul style="list-style-type: none"> ○ The measure provides a disincentive to the use of physical restraint and seclusion. ○ Includes an opportunity for LEAs and charters to highlight their focus or priorities. • Whole child supports (schools select two from a menu): <ul style="list-style-type: none"> ○ KDE’s focus on whole child supports addresses a variety of student and family needs • Proposed measure: <ul style="list-style-type: none"> ○ KDE’s plan to report additional measures not included in the accountability system is admirable.
<i>Weaknesses</i>	<p>The SEA has provided <i>draft</i> measures and metrics for this indicator. These measures have no data to support the validity and reliability or comparability across schools and LEAs. Particularly, the local measure for the school quality indicator as described does not meet the criteria of the single statewide measure. The selection of two measures for whole child support may be problematic because of the incomparability across schools.</p> <p>The SEA’s response on page 63 includes chronic absenteeism without a clear definition, a measure comparing the percentage of students in each subgroup who are classified as “gifted and talented” to the total school population (which may actually violate federal civil rights laws), a work ethic certification assessment without validity or reliability discussion, the percentage of students exhibiting a behavior event without discussion of the validity or reliability of the data, and the percent of students restrained or isolated without enough data to determine if this measure is appropriate, valid, or reliable. Crediting the school for providing weeks of instruction in some unspecified content area may be an important indicator but without definition of what instruction is being measured, loses its power.</p> <p>One Peer noted that several of the proposed measures (i.e., G/T rates) may be outside the schools’ control and therefore would not allow for meaningful differentiation.</p>
<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</i>	Two Peers noted that the SEA should provide detailed information to assure that the indicators allow for meaningful differentiation in school performance, and that the indicators are valid, reliable, comparable, used statewide in all schools (for the grade span to which it applies), and calculated in a consistent

<i>provide to fully meet this requirement</i>	way.
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A.4.v: Annual Meaningful Differentiation (ESEA section 1111(c)(4)(C))

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA describes its system of meaningful differentiation in the tables on pages 71-72. It includes all indicators in the SEA’s accountability system and includes all students and each subgroup. The overall rating of 1-5 stars is based on the combination of indicator ratings of very low, low, medium, high, and very high.
<i>Strengths</i>	The plan is outlined extensively in chart form by grade span and LEAs.
<i>Weaknesses</i>	The tables on pages 71-72 are very complex. There is a lack of detail as to cut points for stars and clarity around how each subgroup is included in the system, particularly for the Opportunity and Access indicator.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA should provide detailed information on cut points for the star system and clarify how each subgroup is included in the system, particularly for the Opportunity and Access indicator. The SEA should provide an explanation and rationale of how schools in one category specifically require less intervention than schools in the category below.

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>	The SEA provides the overall accountability weights in a table on page 73 and includes the possible ranges of the weighting that will be established at a later date. The specified indicators in aggregate are weighted significantly more

	than the school quality or student success indicators in aggregate.
<i>Strengths</i>	Kentucky law, Senate Bill 1 (2017), requires that the annual overall summative performance evaluation for each school and LEA not consist of a single summative numerical score that ranks schools against each other. It does require the evaluation be based on a combination of academic and school quality indicators and measures, with greater weight assigned to the academic factors.
<i>Weaknesses</i>	This section conflicts with the differentiation system described in the previous section, A.4.v.a. This is a broad proposal that lacks specific information on the weighting system. The response does not clarify the weighting of indicators when if one indicator is not applicable for a school/LEA (e.g., the ELP indicator).
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA should provide a detailed description with confirmed weightings for indicators including different cases where certain subgroups/indicators are not applicable for a school/LEA. Please align this response to the response to A.4.v.a.

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

A.4.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>	Based on the accountability system, in SY2018- 2019, the SEA will determine the bottom 5% of Title I schools, in each level (elementary, middle, and high school) using the strength of school performance on school-level measures and indicators. The SEA describes the identification of not less than the lowest-performing 5% of all schools receiving Title I, Part A funds in the State for Comprehensive Support and Improvement.
<i>Strengths</i>	The SEA will also identify the lowest performing 5% of non-Title I schools that fall within that range of performance for Comprehensive Support and Improvement.
<i>Weaknesses</i>	The system of star ratings is unclear and therefore casts doubt that the right 5% of schools will be identified. The description does not provide enough detail to assure the Peers that schools will be identified based on SY2017-2018 performance data for support during SY2018-2019.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA should provide enough detail to assure the Peers that schools will be identified based on SY2017-2018 performance data for support during SY2018-2019. The SEA should also provide clarification of the star rating system and details of how the SEA will differentiate within a star category if more than 5% of Title I schools fall into the lowest category.

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>	Based on the accountability system, in SY2018-2019, the SEA will identify all high schools with less than an 80% graduation rate for Comprehensive Support and Improvement. The SEA will use the 4-yr ACGR.
<i>Strengths</i>	The 80% threshold is more rigorous than the ESSA-mandated 67%.
<i>Weaknesses</i>	The description does not provide enough detail to assure the Peers that schools will be identified based on SY2017-2018 performance data for support during SY2018-2019.
<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>	The SEA should provide enough detail to assure that schools will be identified based on SY2017-2018 performance data for support during SY2018-2019.

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 accordance with its accountability plan, in SY2021-2022, the SEA will identify schools for Comprehensive Support and Improvement that have previously been identified for Tier II Targeted Support and Improvement and have not exited that status after three years.
<i>Strengths</i>	The SEA provided a clear, well-defined “Entrance Criteria” chart to address the identification process and timelines.
<i>Weaknesses</i>	The SEA does not clarify the criteria it will use to measure the subgroup performance (<i>i.e.</i> , proficiency, weighted proficiency, or some other measure). The description does not provide enough detail to assure the Peers that schools will be identified based on SY2017-2018 performance data for support during SY2018-2019.
<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>	The SEA should provide enough detail to assure that schools will be identified based on SY2017-2018 performance data for support during SY2018-2019.

A.4.vi.d: Frequency of Identification

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA will identify the lowest 5% of Title I schools and non-Title I schools that fall within the identified range annually. They will identify all high schools below 80% graduation rate as CSI, using the 4-yr ACGR, annually. Additionally, the SEA will annually identify Tier II TSI schools for CSI beginning SY2021-2022 if the school does not exit that status after three years.
<i>Strengths</i>	The “Frequency of Identification” chart on page 76 describes how the system will work.
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA will identify schools for Tier I Targeted Support and Improvement (Early Warning – Consistently Underperforming Subgroups) where one or more subgroups are performing as poorly as all students in any of the lowest performing 10% of Title I schools or non-Title I schools (by level – elementary, middle or high school), based on school performance, for two consecutive years (identified annually, beginning SY2020-2021).
<i>Strengths</i>	N/A
<i>Weaknesses</i>	The SEA does not include all indicators in the statewide system of annual meaningful differentiation to identify schools for TSI.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information</i>	The SEA should indicate the use of all indicators in the accountability system to identify schools for TSI.

<i>or clarification that an SEA must provide to fully meet this requirement</i>	
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A.4.vi.f: Targeted Support and Improvement Schools—Additional Targeted Support

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA will identify schools for Tier II Targeted Support and Improvement (Low Performance) where one or more subgroups is performing as poorly as all students in any lowest performing 5% of Title I schools or non-Title I schools (by level – elementary, middle or high school), based on school performance annually beginning SY2018-2019.
<i>Strengths</i>	The “Frequency of Identification” chart on page 77 describes how the system will work.
<i>Weaknesses</i>	The response on page 77 is vague as related to the identification of TSI Tier II schools and which indicators will be used for identification. In particular, it is not clear if a school not in the lowest star rating could be identified as TSI Tier II.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA should provide more information and clarity on the identification of TSI Tier II schools and which indicators will be used for identification. Particularly, the SEA should clarify if a school not in the lowest star rating could be identified as TSI Tier II.

A.4.vi.g: If Applicable, Additional Statewide Categories of Schools

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA states that the only testing exemptions provided are for medical and extraordinary circumstances. If a student does not participate in testing, the lowest reportable score on the appropriate test is assigned for accountability calculations for the school and LEA.
<i>Strengths</i>	The SEA has very strict requirements around the 95% participation rule.
<i>Weaknesses</i>	The SEA does not provide an explanation of how they support specific subgroups or schools that don't meet the 95% participation requirement year after year. The SEA also does not provide information regarding if the lowest reportable scores will be used for growth calculations.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA should provide an explanation as to how they will support specific subgroups or schools that don't meet the 95% participation requirement year after year.

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

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

- Does the SEA describe its statewide exit criteria for schools identified for comprehensive support and improvement, which may include how the exit criteria are aligned with the State's long-term goals and measurements of interim progress?

- Does the SEA’s description include the number of years within which schools are expected to meet such criteria?
- Is the number of years no more than four years?
- Do the exit criteria ensure continued progress to improve student academic achievement and school success in the State (e.g., do the exit criteria improve student outcomes and ensure that a school that exits no longer meets the criteria under which the school was identified)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA describes that the exit criteria for CSI is for the identified schools to no longer meet the reason for its identification in the two consecutive years after identification and demonstrates continued progress. If a school meets more than one entrance criterion, they would have to meet the exit criteria for each area.
<i>Strengths</i>	The exit criteria are aligned with the long-term goals, timely, and require continued progress to improve student academic achievement and school success.
<i>Weaknesses</i>	The SEA does not clarify if a school needs to meet the exit criteria for multiple measures in the same years or if the school could meet one criterion for two years and then meet the criteria for another measure in the following years. The response is not clear as to the level of performance necessary for exit (i.e., aligned to the year school entered status or the year school is exiting status).
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA should clarify if a school needs to meet the exit criteria for multiple measures in the same years or if the school could meet one criterion for two years and then meet the criteria for another measure in the following years. The SEA should also clarify the level of performance necessary for exit (i.e., aligned to the year school entered status or the year school is exiting status).

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>	The SEA has determined that Tier II TSI schools with low-performing subgroups (subgroups performing as poorly as all students in any of the lowest performing 5%) must demonstrate subgroup(s) performance above all students in any of the lowest 5% of all schools. Upon meeting the criteria, schools will

	exit Tier II targeted support and improvement status.
<i>Strengths</i>	The SEA provides an “Exit Criteria” chart to address the process.
<i>Weaknesses</i>	The response is not clear as to the level of performance necessary for exit (i.e., aligned to the year school entered status or the year school is exiting status). The inclusion of a LEA-determined exit criteria for TSI Tier I schools is not clear and may conflict with the statutory guidance on statewide exit criteria.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA should clarify the level of performance necessary for exit (i.e., aligned to the year school entered status or the year school is exiting status). The SEA should also provide a rationale for including the LEA-determined exit criteria for TSI Tier I schools because it may conflict with the statute on statewide exit criteria.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA states that upon initial identification for CSI, schools will be required to participate in an initial comprehensive audit of the causes of the school’s low performance. The LEAs are required to select an audit team and a turnaround team to support the CSI schools. If a CSI school fails to exit out of status after 3 years, or not make annual improvement after 2 years, additional State-led comprehensive audit of the school and the LEA will be conducted to amend the school’s Comprehensive School Improvement Plan (CSIP). Following the State-led comprehensive audit, an additional audit will occur every 2 years. Additionally, the SEA will provide Educational Recovery (ER) staff to provide support for each CSI schools to develop and execute strategies around the school’s improvement plan. CSI schools that do not make any annual improvement will receive the State-led comprehensive audit after year 2.
<i>Strengths</i>	The SEA provides a variety of support and technical assistance for schools in status before the State-led intervention begins. The SEA is commended for the rigorous approach to State-determined action.
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.viii.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>	For LEAs serving a significant number of CSI schools in Kentucky, resource allocations to support school improvement will be reviewed during the comprehensive audit process as well as periodically by ER staff. The SEA will address any identified inequities in resources that are having a negative impact on those schools and their students; reallocations will be conducted accordingly.
<i>Strengths</i>	For LEAs serving a significant number of TSI schools, ER staff will review LEA resources and allocations to determine if they are being used effectively for school improvement.
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.viii.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>Kentucky LEAs serving a significant number of CSI schools receive the following supports: 1) the SEA conducts a comprehensive audit at the LEA level to analyze the systems in place; 2) the comprehensive audit determines if the LEA leadership has the capacity to lead school improvement efforts for CSI schools; ER Staff collaborate with the LEA to develop an LEA improvement plan to address the needs of low-performing schools; and ER Staff monitor the implementation of this plan (30/60/90 days) to ensure that the LEA is providing direct support and leadership to the CSI schools.</p> <p>The SEA provides LEAs serving a significant number of TSI schools the following: 1) professional development opportunities for the LEA and school personnel; 2) each LEA is assigned an Education Recovery Leader who collaborates with the LEA to develop a 30/60/90-day improvement plan; and</p>

	the LEA receives periodic visits and assistance from an Educational Recovery Leader to ensure that the plan is being implemented. Additionally, the SEA connects these LEAs to Hub schools; low-performing schools that embraced the school turnaround process and became high-performing schools.
<i>Strengths</i>	The support plan is well thought out and impressive!
<i>Weaknesses</i>	The SEA mentions on page 84 the oversight of the process and plans but does not provide a detailed description of technical assistance beyond connecting the LEAs and school with model schools turning themselves around.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA indicates that LEAs with a significant number of schools that are consistently identified for CSI/TSI status and do not exit could be subject to a review and potential audit regarding LEA governance. The results of the audit could lead to a designation of State-assisted (local board still has authority but the SEA provides assistance) or State-managed (local board loses authority and the SEA assumes supervision) for the LEA. Authority for these efforts comes from Kentucky statute.
<i>Strengths</i>	The SEA’s response appears to be rigorous enough to affect a positive outcome for students.
<i>Weaknesses</i>	Some aspects appear to already be a part of the plan for other levels of support.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA does not address the Disproportionate Rates of Access to Educators (ESEA section 1111(g)(1)(B)) indicator.</p> <p>The SEA describes its Equitable Access for Effective Educators Plan to be the plan to ensure equitable access to effective educators for all students. The Equity Plan has the following 4 focus areas:</p> <ul style="list-style-type: none"> • Teacher preparation • Recruitment, hiring, and placement • Ongoing job-embedded professional learning • Retention <p>The School and District Report Cards will include an Equity tab and display the following measures:</p> <ul style="list-style-type: none"> • Working conditions • Disproportionality measures of the percent of students taught by inexperienced, out-of-field, and ineffective teachers on students who are identified as at-risk • Percent of teacher turnover.
<i>Strengths</i>	<p>With stakeholder involvement, the SEA has written an equity plan for all LEAs with four main areas: Teacher Preparation, Recruitment, Hiring and Placement, Ongoing Job-Embedded Professional Learning and Retention. The SEA is planning a number of resources designed to ameliorate the problem. These resources include School Report Cards, Equity Tab, improvement plans, e-prove, consolidated monitoring, and leadership development (page 90).</p>
<i>Weaknesses</i>	<p>The section on page 86 refers to many plans, laws and documents not in evidence. As in many responses, data that are required to make determinations</p>

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

	of compliance are not provided. The measures used are briefly described in an overview without the level of detail needed to determine if the measures will produce accurate findings. The steps being taken are broad general steps that will in totality improve the quality of teachers, but not specifically those in underserved schools.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <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>The SEA should provide a response addressing the following:</p> <ul style="list-style-type: none"> • Description of 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. • Description of 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. • Description of the measures (<i>e.g.</i>, 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.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA describes how it works across agencies to reduce incidences and support LEAs receiving assistance to improve school conditions for student learning. The description addresses bullying and harassment, Positive Behavioral Interventions and Support (PBIS), physical restraint and seclusion, and significant disproportionality. Additionally, State Statutes are referenced, links to websites are included, processes and procedures are documented and programs such as Response to Intervention (RTI), Mental Health and Trauma Informed Care and Kentucky AWARE are detailed.
<i>Strengths</i>	The SEA has an abundance of resources and it provided in-depth information regarding the supports to enhance school conditions. The SEA has dedicated divisions within its organization to address bullying and provide support to LEAs around social emotional learning.
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers)

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

A.7: School Transitions (ESEA 1111(g)(1)(D))

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	In 2000, Kentucky enacted KRS 158.146 which required the establishment of a comprehensive statewide strategy to provide assistance to LEAs and schools to prevent students from dropping out of school. The SEA supports a Persistence to Graduation (PtG) Tool within the statewide student information system that currently identifies students in elementary through high school that show a risk of becoming off-track for graduation. For SY 2016-2017, KDE launched a new Early Warning Tool in the statewide student information system for grades 9-12 that uses data-mining to more accurately predict which students are most at risk of dropping out. Additionally, the SEA’s Division of Student Success (DSS) has a variety of Persistence to Graduate initiatives and there are alternative education programs available. Interagency efforts address chronic absenteeism and the Division of Learning Services, focuses on transition for students with disabilities. Kentucky has a sound plan with multiple wrap around services to provide transition supports for all students and subgroups.
<i>Strengths</i>	The SEA plans to put together a transition support plan specifically for students with disabilities. The SEA also established a division within its organization to focus on transition—the Division of Student Success (DSS) houses a variety of Persistence to Graduation (PtG) initiatives.
<i>Weaknesses</i>	One Peer noted that the response beginning on page 97 does not appear to focus on students transitioning from elementary to middle or middle to high school. Several initiatives are mentioned but based on the names and descriptions, these appear to focus more on current high school students and transition to college or work than from elementary school to middle school.
<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 noted that the SEA should provide more information on the State support around transitions prior to high school.

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA explains that they will be keeping the same entrance and exit procedures in place under ESEA because they fulfill all the requirements under ESSA as well. The LEAs administer the Home Language Survey to students enrolled in the LEA and potential students are administered the WIDA Access Placement Test. The LEAs are required to complete the screening and a Program Service Plan notification sent to the parents within 30 calendar days in the beginning of the school year and within 2 weeks during the school year. The school superintendents are required to approve and submit assurances in the Grant Management Application and Planning system. Students receiving EL services must take the ACCESS test annually and are able to exit when their composite score is 4.5 or higher. The SEA is re-evaluating whether they should keep the same exit criteria due to standard setting changes to the ACCESS assessment.
<i>Strengths</i>	The SEA clearly explains the process and timeline to provide services for all students in need.
<i>Weaknesses</i>	On page 121, the SEA claims a 5.0 is fully proficient but then states a student who is not proficient is classified. It is unclear if this means a student scoring less than 5.0 or if there is a lower criterion such as 4.5. The response does not specifically indicate a classroom measure or input by the student’s teacher as part of the exit process. However, a review process of entrance and exit criteria has recently taken place and may show increased teacher/classroom input into exit criteria (page 122).
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA describes in detail how its assistance and provision of services to LEAs are tailored to ensure that the interim goals are met and that ELs meet State academic standards. The SEA indicates that they conduct online training at the beginning of the year for new EL coordinators, provide guidance on the types of programs considered effective, and organize workshops, webinars, and resources in collaboration with the WIDA consortium. The SEA also holds an annual conference with the Kentucky Teachers of English to Speakers of Other Languages.
<i>Strengths</i>	The SEA described an extensive level of supports for personnel working with ELs (i.e. Language Instruction Educational Program, WIDA Professional Learning, Stanford University Understanding Language initiative, etc.).
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA utilizes an online consolidated Grant Management Application and Planning (GMAP) system, which includes Title III, Part A, to help the LEAs maximize the use of their grant dollars from federal non-competitive programs. Title III uses the system to monitor, review and approve plans, along with administering reports. The SEA uses a Statewide Consolidated Monitoring Process incorporating Title III whereby they contribute to the overall report, document effective practices and support areas of improvement.

	This collaborative process clearly assists ELs to achieve English language proficiency.
<i>Strengths</i>	N/A
<i>Weaknesses</i>	One Peer noted that Title III monitoring is part of State consolidated monitoring that reviews 14 LEAs per year. With over 170 LEAs in the SEA, this would have any LEA monitored less than once every decade. There is no discussion of data review or other non-intrusive methods to determine if EL students in the LEA are making progress toward language proficiency. No mention is provided of how the SEA will assist an LEA that is not effectively assisting EL students.
<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 noted that the SEA should provide the process by which they will have ongoing monitoring more frequently such that the SEA can more rapidly identify strategies funded by Title III that are not effective.