

STATE PLAN PEER REVIEW CRITERIA Peer Review Panel Notes Template

STATE: Minnesota



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

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

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

A.3.i: Definition

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

| | <i>Peer Response</i> |
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| <i>Peer Analysis</i> | <p>MN does not provide its definition of languages other than English that are present to a significant extent in the participating student population. Although there is no definition, MN includes its most populous language.</p> <p>MN identifies three languages it considers “significant”, which include Somali, Spanish, and Hmong.</p> <p>Although MN plans to research and engage stakeholders in how to most meaningfully provide translations, there is no indication that the state considered the distinct populations required by the regulations or that the state looks at district data or disaggregated grade data.</p> <p>It would be important to also know what percentage each of these languages represents to the total tested population. It is impossible to determine the extent to which these languages exist (significant, etc.) without knowing the student percentages in addition to the number of students.</p> |
| <i>Strengths</i> | <p>MN’s plan outlines specific languages that are most populous as well as the average number of students speaking each language at each grade level within the state; plan further includes processes used to determine which languages were identified, as well as future steps for prioritization of languages to be considered by grade level.</p> <p>MN plans to make word translations in native languages available in pop-ups for its most populous languages. Data is provided on the counts of each group on average in each grade.</p> |
| <i>Weaknesses</i> | <p>MN does not provide a definition of “languages other than English that are present to a significant extent in the participating student population”.</p> <p>MN did not describe how it considered languages other than English that are spoken by distinct populations of English learners, including English learners</p> |

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| | <p>who are migratory, English learners who were not born in the United States, and English learners who are Native Americans. There is no discussion of migratory students, those not born in the United States, or Native American students.</p> <p>MN did not describe how it considered languages other than English that are spoken by a significant portion of the participating student population in one or more of the State’s LEAs, or the 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 reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | <p>MN must provide a definition of “languages other than English that are present to a significant extent in the participating student population.”</p> <p>Furthermore, MN must 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.</p> <p>MN must 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, or the 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> |
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| <i>Peer Analysis</i> | MN does not have any native-language assessments available within the state other than English. |
| <i>Strengths</i> | |
| <i>Weaknesses</i> | |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 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> |
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| <i>Peer Analysis</i> | <p>MN does not have any native-language assessments available within the state other than English.</p> <p>MN identifies Spanish, Somali, and Hmong in its plan; therefore, it might need to develop assessments for these three subgroups and possibly more – once it establishes a definition of “languages other than English that are present to a significant extent in the participating student population”.</p> <p>Beginning in 2018, MN will provide word translations in Spanish, Somali and Hmong for math and science MN Comprehensive Assessments, but no mention is made of word translations for the MN Test of Academic Skills. The translations will be of academic words using a pop-up in the online test and a word list in the paper accommodation.</p> <p>While word translations will be available, MN does not describe how it will make every effort to develop assessments, at a minimum, in languages other than English that are present to a significant extent in the participating student population.</p> |
| <i>Strengths</i> | MN’s plan includes languages for which assessments may be needed. |
| <i>Weaknesses</i> | <p>MN does not indicate the languages other than English that are present to a significant extent in the participating student population, as defined by MN and identified under A.3.i of the consolidated state plan, for which yearly student academic assessments are not available and are needed.</p> <p>MN does not specify for which grades and content areas those assessments would be needed and available.</p> <p>MN does not specify whether the MN Test of Academic Skills will have similar translations.</p> <p>Two reviewers noted that the pop-up translations and word lists are test accommodations, but not consistent with research and best practices for English learners. The reviewers have concerns about the validity of tests provided in English with word lists and pop-ups, because those tests will measure not only content (math and science), but also English proficiency.</p> |
| <i>Did the SEA meet all requirements?</i> | <input type="checkbox"/> Yes (0 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> | Once a definition is established for languages other than English that are present to a significant extent, MN must identify the languages for which yearly student academic assessments are not available but needed, as well as the grade levels and content areas for these assessments. |

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> |
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| <i>Peer Analysis</i> | <p>MN responded with “not applicable” to this question.</p> <p>MN does not provide its definition of “languages other than English that are present to a significant extent in the participating student population”.</p> <p>MN does not 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.</p> <p>MN indicates its intent to conduct research related to English learners and the “most meaningful and appropriate translations presentation”, but does not provide a timeline.</p> <p>MN does not have any native-language assessments available within the state.</p> <p>Beginning in 2018, MN will provide translations in Spanish, Somali and Hmong for math and science MN Comprehensive Assessments. The translations will be of academic words using a pop-up in the online test and a word list in the paper accommodation.</p> <p>MN mentions face-to-face meetings and webinars with discussion with educators and families of English learners and smaller user/focus groups to obtain feedback from families, students, educators, and other stakeholders, but no specific details on timeline and expected outcomes are provided.</p> |
| <i>Strengths</i> | |
| <i>Weaknesses</i> | <p>MN does not 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, and there is no timeline for developing such assessments.</p> |

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| | <p>Since MN does not have a plan or described effort to develop assessments in languages other than English that are present to a significant extent in the participating student population, there is no information available related to the State’s process to include a description of the process the State used to:</p> <ol style="list-style-type: none"> gather meaningful input on the need for assessments in languages other than English; collect and respond to public comment; and consult with educators, parents and families of English learners, students, as appropriate, and other stakeholders. <p>MN does not include an explanation of the reasons (e.g., legal barriers) it has not been able to complete the development of assessments in languages other than English despite making every effort.</p> |
| <p><i>Did the SEA meet all requirements?</i></p> | <p><input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))</p> |
| <p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p> | <p>All four peer reviewers noted that a response of “not applicable” does not sufficiently address this requirement. Therefore, MN must:</p> <ul style="list-style-type: none"> 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, and there is no timeline for developing such assessments, provide a description of how the state will: <ol style="list-style-type: none"> gather meaningful input on the need for assessments in languages other than English; collect and respond to public comment; and consult with educators, parents and families of English learners, students, as appropriate, and other stakeholders; and, if applicable, must include an explanation of the reasons (e.g., legal barriers) it has not been able to complete the development of assessments in languages other than English despite making every effort. |

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> |
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| <i>Peer Analysis</i> | <p>MN uses “student groups” instead of “subgroups” when referring to racial and ethnic groups or other categories of students.</p> <p>According to the MN plan, the state uses “the federally defined set of seven racial and ethnic student groups:”</p> <ul style="list-style-type: none"> American Indian |

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| | <ul style="list-style-type: none"> • Asian • Black • Hispanic • Pacific Islander • Two or more races • White |
| <i>Strengths</i> | MN believes it is important to use inclusive language that does not marginalize groups of people; therefore, the SEA uses “student groups” instead of “subgroups” when referring to racial and ethnic groups, or other categories of students. |
| <i>Weaknesses</i> | n/a |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 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> |
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| <i>Peer Analysis</i> | <p>MN makes reference to the statutorily required subgroups (economically disadvantaged students, English learners, and students with disabilities).</p> <p>MN also proposes to use “counter-groups” to “promote balance” in the number of groups in which a student can be included.</p> |
| <i>Strengths</i> | |
| <i>Weaknesses</i> | <p>MN does not clearly indicate how calculations are conducted when a subgroup and counter-group are present in accountability calculations; as such, inclusion of counter-groups could diminish the impact of subgroups in the model.</p> <p>All four reviewers noted that MN’s use of “counter-groups” for historically-underserved students (students with disabilities, economically-disadvantaged students, and English learners) is deliberately counter to the goal of equity and to the purpose of subgroup accountability.</p> |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet</i> | |

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

A.4.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> |
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| <i>Peer Analysis</i> | MN will use an n count of 20 for accountability for all students and subgroups, continuing the approach it has used in the most recent past. |
| <i>Strengths</i> | MN uses the same count for schools and districts. While not required under ESSA, district accountability picks up some students that are not captured in school accountability. |
| <i>Weaknesses</i> | |
| <i>Did the SEA meet</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) |

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

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

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

| | <i>Peer Response</i> |
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| <i>Peer Analysis</i> | <p>MN stakeholders analyzed several minimum n size possibilities (30, 20, and 15). MN determined 20 to be appropriate in order to balance stability in the system with maximum meaningful inclusion of student groups in schools across the state. An n-size of 20 was introduced during the NCLB waiver, down from 40 students in the past.</p> <p>One peer reviewer noted that MN did address input and stability, but did not provide information on the statistical soundness of the n size (specifically whether the state took a population perspective or a sampling perspective).</p> |
| <i>Strengths</i> | MN analyzed and presented data examining different minimum n size options (including cell sizes of 30, 20 and 15), considering both (a) the percentage of students in each student group who would be included in that group for accountability purposes, and (b) the percentage of schools serving students in those subgroups that would see the subgroup included in school calculations. |
| <i>Weaknesses</i> | Plan could be strengthened to provide additional statistical data and clarification regarding soundness of the n size of 20, based on either a population or sampling perspective for accountability. |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet</i> | One reviewer noted that MN must describe the statistical soundness, based on whether the state takes a population or sampling perspective, as described in the IES best practices document noted in footnote 2 below. |

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.

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| <i>this requirement</i> | |
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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> |
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| <i>Peer Analysis</i> | MN consulted stakeholders, including educators, parents, and civil rights groups, to make its n size determination. Stakeholders received data on how many students would be included in each subgroup and how many schools for each subgroup. Based on this input and data analysis that looked at stability and the number of schools included, MN selected a n size of 20 students. |
| <i>Strengths</i> | The process included an analysis of data examining different minimum number options (including cell sizes of 30, 20 and 15), considering both (a) the percentage of students in each student group who would be included in that subgroup for accountability purposes, and (b) the percentage of schools serving students in those subgroups that would see the subgroup included in school calculations. MN conducted extensive activities to involve stakeholders and to provide them with information in order to make informed decisions related to n size. |
| <i>Weaknesses</i> | |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 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> |
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| <i>Peer Analysis</i> | MN uses some techniques—such as primary suppression that replaces data for students below the minimum number with “Count Too Small to Report” to ensure that the minimum number of students will protect the privacy of |

³ See footnote 5 above for further guidance.

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| | <p>individual students.</p> <p>MN is continuing efforts to implement additional secondary suppression techniques and establish reporting minimum and maximum percentages to further protect students' privacy.</p> |
| <i>Strengths</i> | MN referenced the IES Best Practices report in its plan, and MN is using some of the practices recommended in the report to protect student information. |
| <i>Weaknesses</i> | MN does not thoroughly articulate the secondary suppression it plans to use (e.g. top and bottom coding as numbers approach 0% or 100%) in order to ensure student privacy. |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | |

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

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

| | <i>Peer Response</i> |
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| <i>Peer Analysis</i> | <p>MN provides the minimum n size for accountability at 20 students, and the minimum n size for reporting at 10 students.</p> <p>MN mentions its continuing efforts to implement additional suppression rules to protect student privacy, but the state does not provide any details.</p> |
| <i>Strengths</i> | By reporting a minimum n size of 10 students, schools and districts will have access to subgroup performance for smaller groups of students, even if the groups are not included in accountability calculations. |
| <i>Weaknesses</i> | One reviewer noted that MN does not provide examples of secondary suppression. The state fails to provide statistical reliability justification. |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | One reviewer noted that MN must describe how the minimum reporting number of 10 is statistically reliable. |

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> |
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| <i>Peer Analysis</i> | <p>MN identifies (by providing a numeric measure), and describes 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.</p> <p>MN’s long-term goals are ambitious, as the state provides baseline data and sets a goal for reading/language arts and math achievement rate of 90% proficiency with no subgroup below 85% proficient by the year 2025.</p> <p>The timeline is the same for all students and for each subgroup of students.</p> <p>MN did not provide a timeline or goals for the proposed additional “counter-groups” of students.</p> |
| <i>Strengths</i> | <p>The timeline is short (2025), reflecting a sense of urgency for improvement.</p> <p>MN recognizes that it is important to “provide the data in a way that families, communities and educators can clearly understand achievement relative to goals.”</p> <p>MN also provides evidence that its goals are achievable, as the plan describes how the goals are currently being met by some schools in the state. “The current performance for the “all students” group in the top performing schools in the state is similar to the 2025 goal to reach achievement rates of 85 for each student group, with some differences between math and reading/language arts. This sets a motivating expectation that all Minnesota schools can strive to ensure all student groups achieve at the same levels as our schools with the highest performance.”</p> |
| <i>Weaknesses</i> | <p>MN’s plan does not explain how “all students” will perform at an achievement rate of 90% in Reading and Mathematics when no subgroup is expected to perform above 85% by 2025, according to the charts provided in Appendix A.</p> <p>MN’s plan does not provide data for “counter-groups”.</p> |
| <i>Did the SEA meet all requirements?</i> | <input type="checkbox"/> Yes (0 peer reviewer(s)) |

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|--------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <input checked="" type="checkbox"/> No (4 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | <p>If “counter-groups” are included in the accountability plan, MN must provide long-term goals and a timeline for the proposed “counter-groups”.</p> <p>MN must explain how the “all students” group reaches a proficiency rate of 90% in Reading and Mathematics, while no subgroup has a goal higher than 85% in 2025.</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> | |
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| <i>Peer Analysis</i> | <p>MN provides MIPs for academic achievement in Reading and Mathematics through 2025.</p> <p>Interim measures appear in Appendix A, and they require faster growth for those furthest behind.</p> |
| <i>Strengths</i> | |
| <i>Weaknesses</i> | <p>MN’s plan does not explain how “all students” will reach MIPs in Reading and Mathematics that are higher than the MIPs for any single subgroup. This issue occurs in the last three years of the timeline.</p> <p>MN’s plan does not provide data for “counter-groups.”</p> |
| <i>Did the SEA meet all requirements?</i> | <p><input type="checkbox"/>Yes (0 peer reviewer(s))</p> <p><input checked="" type="checkbox"/>No (4 peer reviewer(s))</p> |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | <p>If “counter-groups” are included in the accountability plan, MN must provide MIPs for the proposed “counter-groups.”</p> <p>MN must explain how the “all students” group meets MIPs in Reading and Mathematics that are higher than the MIPs for any single subgroup.</p> |

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> | |
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| <i>Peer Analysis</i> | <p>MN’s long-term goals require that all students reach a high level of achievement but takes into account the accelerated improvement that is necessary for some subgroups in order to close achievement gaps. While all subgroups are expected to improve, subgroups that are currently achieving at lower levels than their counterparts have the highest expected gains.</p> |
| <i>Strengths</i> | Goals outlined in Appendix A result in achievement gap closure among |

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| | subgroups, and are significantly more ambitious for subgroups with lower baseline performance. |
| <i>Weaknesses</i> | <p>One reviewer noted conflicting language in the MN plan. In Part 3, page 10, MN states that “all schools and all student groups are expected to reach a high bar in the year 2025. Different expectations are not set for different student groups”. This seems to be in conflict with the statement on page 9, “Consistent with MDE’s mission, this statewide goal was established with a clear focus on ensuring excellence and equity for all Minnesota students. It requires that all students reach a high level of achievement but takes into account the accelerated improvement that is necessary for some student groups in order to close achievement gaps. While all groups are expected to improve, student groups that are currently achieving at lower levels than their counterparts have the highest expected gains.”</p> <p>As noted above, MN’s plan does not explain how “all students” will reach MIPs in Reading and Mathematics that are higher than the MIPs for any single subgroup. This issue occurs in the last three years of the timeline.</p> |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | |

A.4.iii.b: 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> |
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| <i>Peer Analysis</i> | <p>MN has set a goal of a four-year adjusted cohort graduation rate of 90% with no student group below 85% by the year 2020. The 2020 graduation rate goal that was established in 2012.</p> <p>Appendix A provides the baseline data and long-term goals using the four-year adjusted cohort graduation rate for all students and for each subgroup of students, with the exception of proposed “counter-groups.”</p> <p>The timeline is the same multi-year length of time for all students and for each subgroup of students.</p> |

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| | The long-term goals are ambitious, particularly for subgroups that are currently graduating at lower levels than their counterparts. These subgroups have the highest expected gains. |
| <i>Strengths</i> | The timeline is very short, placing a great sense of urgency around this goal. Data provided shows improvement in this area since 2012. |
| <i>Weaknesses</i> | As with the academic achievement goals, MN’s plan does not explain how an “all students” graduation rate of 90% will be achieved when all student subgroups are expected to achieve a four-year adjusted cohort graduation rate of 85% in 2020. MN does not provide baseline data and long-term goals for the proposed “counter-groups.” |
| <i>Did the SEA meet all requirements?</i> | <input type="checkbox"/> Yes (0 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> | MN must demonstrate how an “all students” graduation rate of 90% will be achieved when all student subgroups are expected to achieve a four-year adjusted cohort graduation rate of 85% in 2020. MN must provide baseline data and long-term goals for the proposed “counter-groups.” |

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> |
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| <i>Peer Analysis</i> | MN is using seven-year adjusted cohort graduation rate in its accountability system, but does not provide baseline data, timeline, or long-term goals, either for all students or for subgroups. |
| <i>Strengths</i> | MN recognizes that some students (<i>i.e.</i> , students with disabilities, recently arrived English learners, and at-risk students) may need additional time to graduate, and is therefore including this extended cohort in the model, placing a heavier emphasis on the four-year than the seven-year rate. |
| <i>Weaknesses</i> | While MN is using the seven-year adjusted cohort graduation rate in its accountability system, the state does not provide seven-year adjusted cohort graduation rate long-term goals. |
| <i>Did the SEA meet all requirements?</i> | <input type="checkbox"/> Yes (0 peer reviewer(s)) |

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| | <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> | For the seven-year adjusted cohort graduation rate, MN must provide baseline data, timeline, and long-term goals that are more rigorous than the state's four-year goals. |

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> |
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| <i>Peer Analysis</i> | MN describes in Appendix A the MIPs for the four-year adjusted cohort graduation rates for all students and separately for each subgroup of students, with the exception of the proposed “counter-groups.” |
| <i>Strengths</i> | |
| <i>Weaknesses</i> | <p>As with the academic achievement MIPs, MN’s plan does not explain how “all students” MIPs for four-year adjusted cohort graduation rate will be achieved when no student subgroup is expected to achieve a four-year adjusted cohort graduation MIP as high as the “all students” MIP. This is an issue for each year from 2017-2020.</p> <p>One reviewer noted that MN’s timeline for goals related to graduation rate has largely passed (four of eight years’ worth of data).</p> <p>MN does not provide MIPs for proposed “counter-groups.”</p> <p>While MN is using the seven-year adjusted cohort graduation rate in its accountability system, the state does not provide seven-year adjusted cohort graduation rate MIPs.</p> |
| <i>Did the SEA meet all requirements?</i> | <input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | <p>MN must explain how “all students” MIPs for four-year adjusted cohort graduation rate will be achieved when no student subgroup is expected to achieve a four-year adjusted cohort graduation MIP as high as the “all students” MIP.</p> <p>MN must provide MIPs for proposed “counter-groups” and for seven-year adjusted cohort graduation rate.</p> |

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> |
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| <i>Peer Analysis</i> | <p>MN shows the expectations for improvement for subgroups of students traditionally behind in the table in Appendix A.</p> <p>Although proposed “counter-group” data is not provided for all groups in Appendix A, the four-year adjusted cohort graduation rate goals require much faster growth for low-performing groups and leads to narrowed gaps.</p> |
| <i>Strengths</i> | |
| <i>Weaknesses</i> | |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | |

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

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

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

| | <i>Peer Response</i> |
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| <i>Peer Analysis</i> | <p>MN’s plan includes state-determined timelines, baseline data, and ambitious long-term goals for increases in the percentage of students making progress on the WIDA ACCESS for ELLs 2.0, as used by MN, through 2025. This goal is very ambitious, as it requires the state to more than double its current percent of ELs making progress in a short timeline.</p> <p>MN provides its existing baseline data, noting that the availability of historical data to assess trends and establish a definitive state baseline is somewhat limited because the first administration of the WIDA ACCESS for ELLs 2.0 assessment was in 2015-16.</p> |

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| | MN noted that it will review and revise, if appropriate, the baseline data, long-term goal, and interim measurements of progress when updated ACCESS data becomes available. |
| <i>Strengths</i> | Students with limited or interrupted formal education (SLIFE) will receive one additional year in their timelines if they are at a beginning or intermediate proficiency level, but not if they are initially at an advanced proficiency level. MN recognizes that more growth is expected for EL students in the lower levels of proficiency, and further allows for students at beginning or intermediate proficiency levels if they have limited or interrupted formal education. |
| <i>Weaknesses</i> | |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | |

A.4.iii.c.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> |
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| <i>Peer Analysis</i> | MN's plan includes baseline data and MIPs resulting in a long-term goal of 85% progress toward proficiency by 2025. |
| <i>Strengths</i> | |
| <i>Weaknesses</i> | While not required, the plan could be strengthened by providing details about interventions or how dual-identified students may need assistance to meet growth demands in later years. |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | |

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

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

A.4.iv.a: Academic Achievement

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

| | <i>Peer Response</i> |
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| <i>Peer Analysis</i> | <p>MN describes the use of an academic achievement indicator based on the statewide goals for reading/language arts and math on the Minnesota Comprehensive Assessments (MCA) and Minnesota Test of Academic Skills (MTAS) administered in grades 3-8 and once in high school.</p> <p>The achievement rate index will be calculated at all school levels, including elementary, middle and high schools. This rate will award schools 1.0 points for every student in either the “meets standards” or “exceeds standards” achievement level. The number of points at a school will be divided by the number of students enrolled at the school who attended for at least half an academic year.</p> <p>Achievement rates will be calculated separately for math and for reading/language arts, and the two subjects will receive equal weight in the system of annual meaningful differentiation.</p> <p>MN does not describe how this indicator measures 95% of all students and subgroups of students.</p> |
| <i>Strengths</i> | |
| <i>Weaknesses</i> | <p>Three reviewers noted that, while not required by ESSA, MN could strengthen its plan by including a measure of student growth for high schools.</p> <p>MN states that “Students who do not participate in the test will be identified in state records and in communication with families as not participating; they will not be described as failing to meet standards.” Therefore, MN does not ensure that this indicator measures the performance of at least 95% of all students and 95% of all students in each subgroup. ESSA clearly states that once test participation falls below 95%, the non-tested students must be counted as non-proficient in proficiency calculations. In the case of MN, this would require that non-tested students below 95% be included in the denominator of the achievement calculation.</p> |

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| | MN’s proposes calculation of a “school average” by averaging subgroup rates and awarding equal weight to each subgroup, including “counter-groups”, which de-emphasizes the importance of achievement by historically-underperforming subgroups. |
| <i>Did the SEA meet all requirements?</i> | <input type="checkbox"/> Yes (0 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> | Two reviewers noted that MN must ensure that this indicator measures the performance of at least 95% of all students and 95% of all students in each subgroup. All four reviewers noted that MN must base this indicator on the state’s long-term goals. |

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> |
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| <i>Peer Analysis</i> | MN uses a transition matrix growth-to-proficiency model for elementary and middle schools. This model awards points based on students progressing in achievement levels on the state math and reading/language arts tests. Schools receive a score in each subject. MN recognizes students who make the most progress from one year to the next (moving to a higher performance level on the state assessment). School averages will be based on equally weighted subgroup averages. |
| <i>Strengths</i> | MN gives greater credit to students who make more progress from one year to the next. This metric provides credit for any movement along the achievement performance levels, not just movement to proficiency. It looks at individual student growth from one year to the next. This metric provides the chance for |

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| | <p>all schools to demonstrate success in the initial year.</p> <p>The matrix will recognize schools with students who are making growth toward proficiency.</p> |
| <i>Weaknesses</i> | As with the academic achievement indicator, the “school average” approach may mask low performing subgroup(s) due to the inclusion of “counter-groups.” |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 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.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> |
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| <i>Peer Analysis</i> | <p>MN’s graduation rate indicator separately uses a school’s four-year adjusted cohort graduation rate and seven-year adjusted cohort graduation rate.</p> <p>The four-year rate is prioritized greater than the seven-year graduation rate for accountability purposes.</p> <p>MN uses the four-year graduation rate in World’s Best Work Force state accountability and to identify high schools with a low graduation rate for support.</p> |

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| | <p>MN tracks and reports school and district performance relative to the statewide four-year graduation goal overall and for each student subgroup.</p> <p>Each graduation rate (four-year and seven-year) is calculated at the student group level first (including for the “all students” group). A school average is calculated by averaging student group rates, awarding equal weight to each student group in the school. This allows the indicator to be disaggregated by student subgroups.</p> <p>MN does not award alternate diplomas.</p> |
| <i>Strengths</i> | |
| <i>Weaknesses</i> | <p>While not required, MN could explain how it will calculate graduation rates for schools that do not meet the minimum n size.</p> <p>MN has not established long-term goals for its seven-year adjusted cohort graduation rate. Furthermore, MN’s accountability system is not based upon four-year goals.</p> <p>MN’s use of a seven-year adjusted cohort graduation rate rather than a shorter adjusted cohort graduation rate (5 or 6 years) needs further explanation.</p> |
| <i>Did the SEA meet all requirements?</i> | <input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | <p>MN must explain how this indicator is aligned to the state’s long-term goals for both the four-year and seven-year adjusted cohort graduation rates.</p> |

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

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

| | <i>Peer Response</i> |
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| <i>Peer Analysis</i> | <p>MN has a clear definition of English Language Proficiency, as well as a timeline for EL students to progress toward proficiency, based upon performance on the WIDA ACCESS for ELLs 2.0, and taking into account the grade level at which students first take this assessment.</p> <p>MN defines proficiency as achieving a composite score of 4.5 for the four</p> |

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| | <p>domains on ACCESS.</p> <p>ACCESS is used for English learners in grades 1-12.</p> <p>At the student level, the model uses a four-step process the first time a student is included.</p> <p>Students receive a growth target for each year along their path to proficiency. Targets require faster growth at lower levels of proficiency (based on historical data, scores tend to improve faster at lower scale scores than at higher ones).</p> <p>The timelines for making progress have been set based on historical data about the time required for English Language Learners in MN.</p> |
| <i>Strengths</i> | <p>Students with limited or interrupted formal education (SLIFE) receive one additional year in their timelines if they are at a beginning or intermediate proficiency levels.</p> <p>When students exceed their target for the year, MN updates annual targets.</p> <p>MN emphasizes greater growth for students at lower performance levels and awards credit for students who progress some portion of the way toward their targets</p> |
| <i>Weaknesses</i> | <p>While the indicator is aligned to the student-level expectations for annual progress toward exit, all four reviewers noted that, although not required, the indicator is not aligned to statewide long-term goals for improvement in the percentage of students making such progress.</p> |
| <i>Did the SEA meet all requirements?</i> | <p><input checked="" type="checkbox"/> Yes (4 peer reviewer(s))</p> <p><input type="checkbox"/> No (0 peer reviewer(s))</p> |
| <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> |
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| <i>Peer Analysis</i> | <p>MN has a short-term and long-term plan for developing and using indicators of school quality or student success. Currently, MN uses consistent attendance as its indicator of school quality for all school levels, including elementary, middle, and high schools, including both traditional public schools and charter schools.</p> <p>Consistent attendance is defined by the percentage of students in a student group who are not chronically absent.</p> <p>A student is determined to be chronically absent if his/her attendance rate is at or below 90% during the days of enrollment in a school. A student must be enrolled for at least half an academic year to be included in a school's calculation. The consistent attendance rate will be consistently calculated by subtracting the percentage of chronically absent students from 100%.</p> <p>MN appears confident in the integrity of its current system of attendance data and will apply the same rules to all schools and all subgroups within the state, therefore, the measure allows for meaningful differentiation and is valid, reliable, and comparable.</p> |
| <i>Strengths</i> | <p>MN is considering stakeholder input, and the state has expressed an interest in including in-school suspensions as a part of the consistent attendance measure. MN will continue a close analysis of the data in its student information system to determine how the state might use in-school suspension data in a meaningful way within the consistent attendance indicator.</p> <p>MN is committed to supporting districts with positive behavior interventions.</p> <p>Computation of absenteeism is based on uniform submission standards.</p> <p>The consistent attendance rate is calculated at the student group level first (including for the "all students" group), and then a school average will be calculated by averaging student group rates, awarding equal weight to each subgroup in the school. This will allow the indicator to be disaggregated by subgroup.</p> |
| <i>Weaknesses</i> | <p>While not required, MN provided long-term goals and MIPs for this indicator; however, MN's goals describe a 95% rate for "all students" in 2020, while no subgroup is above 90%.</p> |
| <i>Did the SEA meet all requirements?</i> | <p><input checked="" type="checkbox"/> Yes (# peer reviewer(s))</p> <p><input type="checkbox"/> No (# peer reviewer(s))</p> |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | |

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> |
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| <i>Peer Analysis</i> | <p>MN describes a stage-based decision process to differentiate between all public schools, including charter schools. This stage-based decision process includes all indicators, and evaluates each subgroup against each indicator. The order of stages in the decision process has been designed to grant substantial weight to each indicator and greater weight to the academic indicators.</p> <p>The stages are different for elementary and middle schools than for secondary schools.</p> <p>MN will use five labels to differentiate schools into categories, but the state has not decided on specific names yet. Every subgroup that is eligible by n count is weighted equally in determining a school’s score. Then relative ranks are used to determine those schools most in need of support.</p> |
| <i>Strengths</i> | All indicators are included in the system. The use of a tiered system for identification reflects the state’s theory of action and is easily understood. |
| <i>Weaknesses</i> | All four reviewers noted that MN’s use of “counter-groups” for historically-underserved students (students with disabilities, economically-disadvantaged students, and English learners) is counter to the goal of equity and to the purpose of subgroup accountability. |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | |

A.4.v.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> |
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| <i>Peer Analysis</i> | <p>Two peer reviewers noted that MN does not weight each indicator by a percentage or value, but rather the state prioritizes indicators by the order in which indicators are considered in the stage-based identification decision process for Comprehensive or Targeted School Improvement.</p> <p>Two peer reviewers noted that MN places much greater weight on the academic indicators in the first and second stages, as the achievement and progress indicators are initially considered in the decision process; therefore, schools with strong achievement and progress would not be considered for identification for support. The academic achievement and English language proficiency indicators are considered to have greater weight than subsequent indicators through the decision process.</p> <p>For elementary and middle schools, the second stage includes the other academic indicator, academic progress in math and academic progress in reading/language arts.</p> <p>For high schools, the second stage includes four-year graduation rate, followed by seven-year graduation rate.</p> <p>The third and final stage uses consistent attendance, which is MN's SQSS indicator.</p> |
| <i>Strengths</i> | One reviewer noted that this system is easier for the general public to understand than a weighted average approach. |
| <i>Weaknesses</i> | Two reviewers noted that MN does not provide adequate information on the weighting of each indicator. Therefore, it is not possible to determine if the academic indicators receive substantial weight individually. |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (2 peer reviewer(s)) <input checked="" type="checkbox"/> No (2 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | <p>Two reviewers noted that MN must provide a description that adequately explains weighting of each indicator in the accountability system, including how weighting is adjusted for schools in which an indicator cannot be calculated due to small n size.</p> <p>Two reviewers noted that MN must provide clear evidence of how each academic indicator receives substantial weight individually, and in the aggregate, much greater weight than the SQSS indicator.</p> |

A.4.v.c: If Applicable, Different Methodology for Annual Meaningful Differentiation

- If the SEA uses a different methodology or methodologies for annual meaningful differentiation than the one described in 4.v.a of the State's plan for schools for which an accountability determination cannot be made (e.g., P-2 schools), does it describe the different methodology or methodologies, including how the methodology or methodologies will be used to identify schools for comprehensive or targeted support and improvement?

- Does the SEA’s description of a different methodology indicate the type(s) of schools to which it applies?

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

A.4.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> |
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| <i>Peer Analysis</i> | <p>MN will identify schools prior to the 2018-19 school year, based upon three prior years of data.</p> <p>MN describes the methodology used to identify the lowest-performing 5% of elementary and middle schools using one set of criteria.</p> <p>MN describes the methodology used to identify the lowest-performing 5% of high schools using a different set of criteria, which includes both four-year and seven-year graduation rates.</p> <p>MN identifies two additional types of schools that are eligible for support based on a similar process that is used to identify Category A schools.</p> <p>If a school is missing all the indicators in a given stage, it will automatically move to the next stage.</p> |
| <i>Strengths</i> | MN will consider three years of data, averaged and compiled, creating a more robust examination of recent school performance rather than a single year of data. |

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| | MN has a separate process for identification of Title I high schools to ensure some high schools are selected for Comprehensive Support and Improvement. |
| <i>Weaknesses</i> | <p>MN does not provide a detailed explanation of how averages will be calculated for multiple years in each school to account for changes in enrollment or other factors.</p> <p>One reviewer noted that MN should have more clearly stated the year in which schools will be identified (for instance, “during”, rather than “before” 2018-19).</p> |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | |

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

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

| | <i>Peer Response</i> |
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| <i>Peer Analysis</i> | <p>MN will consider three years of four-year graduation rate data, either for all students or for subgroups less than 20 students. Calculations will be for all high schools, not only schools that receive Title I, Part A funds.</p> <p>The state identifies any school in which all students or any subgroup has a four-year graduation rate lower than 67%. The state calculates this rate using an average of three years of data. These schools will be identified before the 2018-19 school year, using data from 2016-17, 2015-16, and 2014-15.</p> |
| <i>Strengths</i> | <p>MN will use multiple years of data for this calculation, offering a more robust picture of graduation trends within a school or subgroup</p> <p>The state uses only the four-year graduation rate and uses data from the most recent three years of data available.</p> |
| <i>Weaknesses</i> | <p>While the identification of high schools failing to graduate any subgroup of students based on the 4-year adjusted cohort graduation rate exceeds the requirement of ESSA for CSI identification, this raises concerns regarding availability of resources to support identified schools.</p> <p>MN does not provide a detailed explanation of how averages will be</p> |

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| | <p>calculated for multiple years in each school to account for changes in enrollment or other factors.</p> <p>MN mentions use of “counter-groups” for accountability, but it is not clear whether these groups are used in graduation rate; as such, calculations could be compromised by the use of these “counter-groups” as discussed earlier.</p> <p>One reviewer noted that MN should have more clearly stated the year in which schools will be identified (for instance, “during”, rather than “before” 2018-19).</p> |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | |

A.4.vi.c: Comprehensive Support and Improvement Schools—Additional Targeted Support Not Exiting Such Status

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

| | <i>Peer Response</i> |
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| <i>Peer Analysis</i> | <p>MN provides its definition of schools that have received additional targeted support and have not satisfied the statewide exit criteria within three years.</p> <p>MN’s plan requires student groups to avoid reidentification in subsequent three-year cycles, or else schools will be placed in Comprehensive Support and Improvement status, based upon the most recent three years of data, beginning in 2021-22. Data will be calculated for each year individually, and an average of the individual years’ data will then be calculated for each indicator. These are schools where a student group is performing as low as the bottom five percent of schools.</p> <p>MN does not make it clear that ONLY Title I schools designated for additional TSI that have not satisfied the exit criteria are to be identified for CSI. MN appears to consider ALL schools that failed to exit additional TSI status.</p> |
| <i>Strengths</i> | MN will consider three years of data for the determination of schools falling into this category, allowing schools time to improve. |
| <i>Weaknesses</i> | One reviewer noted that MN should have more clearly stated the year in which schools will be identified (for instance, “during”, rather than “before” 2021- |

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| | 22). |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | |

A.4.vi.d: Frequency of Identification

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

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| <i>Peer Analysis</i> | MN has clearly established timelines for identification of Comprehensive Support and Improvement schools, beginning before the 2018-19 school year, and at least once every three years thereafter. |
| <i>Strengths</i> | |
| <i>Weaknesses</i> | One reviewer noted that MN should have more clearly stated the year in which schools will be identified (for instance, “during”, rather than “before” 2018-19). MN has provided placeholders, but has not yet established names for each category. MN does not provide details on how these names will be established or what stakeholders may be involved. |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 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> |
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| <i>Peer Analysis</i> | <p>MN uses the same stage-based decision process (noted earlier as a point of concern by two reviewers) used to identify Category A (CSI) schools (the lowest 5 percent of schools receiving Title I, Part A funds) to identify all schools with a consistently underperforming subgroup.</p> <p>MN indicates that each student group will be compared against the threshold used to define the bottom quarter of each indicator (or the bottom half of the graduation rate indicators) when Category A (CSI) schools were identified.</p> <p>MN identifies these schools annually and will begin before the 2018-19 school year.</p> |
| <i>Strengths</i> | MN examines a three-year data trend to determine consistently underperforming subgroups, allowing for an extensive review of subgroup performance. |
| <i>Weaknesses</i> | <p>One reviewer noted that this process could result in an unreasonably high number of schools identified to receive targeted support; this could lead to more implicit rather than explicit consequences and support.</p> <p>One reviewer noted that MN’s definition of “consistently underperforming” sets a <u>very low bar</u> (by beginning with the performance of schools in the bottom quarter of Title I schools), and could result in few schools being identified for TSI since the subgroup(s) must fall below the threshold on ALL indicators.</p> <p>MN has described its “counter-group” as a group for accountability, but the state does not indicate whether this group would be considered as a subgroup that could lead to identification for support.</p> <p>One reviewer noted that MN should have more clearly stated the year in which schools will be identified (for instance, “during”, rather than “before” 2018-19).</p> |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 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.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> |
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| <i>Peer Analysis</i> | <p>MN describes 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).</p> <p>MN uses the same stage-based decision process used to identify Category A schools (the lowest 5% of schools receiving Title I, Part A funds) to identify all schools where any student group is performing similarly to the average of the lowest 5% of schools receiving Title I, Part A funds. Each subgroup is compared against the average performance of Category A schools on each indicator. Schools that do not demonstrate sufficient progress with the subgroup that was identified move into Category D.</p> <p>These schools will be identified before the 2018-19 school year and every three years thereafter.</p> <p>Only one year of progress toward English language proficiency data will be able to be calculated in the first year. Additional years of data will be used for the progress toward English language proficiency indicator as they become available, with up to three years of data used to make identifications.</p> <p>The methodology identifies schools from among <u>all public schools</u>.</p> |
| <i>Strengths</i> | MN has demonstrated consistency in the identification stages across school categories. |
| <i>Weaknesses</i> | <p>One reviewer noted that MN should have more clearly stated the year in which schools will be identified (for instance, “during”, rather than “before” 2018-19).</p> <p>MN does not indicate whether a school has to perform below average in only one area, or in all three areas (achievement/ELP, academic progress, and consistent attendance). This clarity is needed for stakeholders to better understand the identification criteria.</p> |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 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.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> |
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| <i>Peer Analysis</i> | Not applicable |
| <i>Strengths</i> | |
| <i>Weaknesses</i> | |
| <i>Did the SEA meet all requirements?</i> | <input type="checkbox"/> Yes (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | |

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

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

| | <i>Peer Response</i> |
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| <i>Peer Analysis</i> | <p>MN has indicated that students who do not test, but are expected to test, will be included in the denominator for calculations unless there is a documented medical excuse, and that they will be identified in state records.</p> <p>Students “not participating” in the test are identified as such in state records and in communications with families.</p> <p>MN calculates academic achievement on the number of students enrolled for at least half an academic year in tested grades.</p> |
| <i>Strengths</i> | |
| <i>Weaknesses</i> | <p>Two reviewers noted that MN does not clearly describe how it factors the requirement for 95% participation of all students and 95% of all students in each subgroup of students in statewide mathematics and reading/language arts assessments into the statewide accountability system.</p> <p>Two reviewers noted that MN could strengthen its plan by explicitly addressing what action is taken when subgroups miss the participation rate requirement, the length of time over which the school has missed the requirement, and the degree to which the school missed the requirement.</p> |

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| | It is unclear whether using a “0” in the numerator for non-participants is severe enough to cause schools to increase or maintain high participation rates for all students. |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (2 peer reviewer(s)) <input checked="" type="checkbox"/> No (2 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | Two reviewers noted that MN must clearly describe how it factors the requirement for 95% participation of all students and <u>95% of all students in each subgroup</u> of students in statewide mathematics and reading/language arts assessments into the statewide accountability system. |

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> |
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| <i>Peer Analysis</i> | MN has clear criteria by which schools may exit Comprehensive Support and Improvement status after three years, tied directly to improved performance compared to other schools and based upon indicators which led to initial identification. If a school identified in one identification year is again identified in the next identification year, it remains identified for CSI status with more rigorous interventions. |
| <i>Strengths</i> | |
| <i>Weaknesses</i> | The SEA does not describe how the exit criteria are aligned with the state’s long-term goals and measurements of interim progress. MN states that a CSI school that is not re-identified would be moved to TSI if it meets either of two conditions: <ol style="list-style-type: none"> 1. The school remains below the 25th percentile of Title I schools in any Stage 1 indicator (math achievement, reading achievement, or progress toward English language proficiency). 2. The school fails to show improvement on all indicators, which led to its initial identification. A TSI designation is focused on subgroup performance. As such, moving CSI schools to TSI based on overall performance appears to be a misclassification |

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| | <p>of schools, as the issues are not related to subgroup performance.</p> <p>It is possible that if statewide performance regresses, a school could exit CSI status not by improving student outcomes, but rather by regressing less than other schools.</p> |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | |

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

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

| | <i>Peer Response</i> |
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| <i>Peer Analysis</i> | <p>MN describes its statewide exit criteria for schools receiving additional targeted support.</p> <p>A school is identified for additional targeted support because one or more student subgroups at that school perform similarly to the identified lowest 5% of Title I schools.</p> <p>If a non-Title I school identified in one identification year is again identified in the next identification year, it remains identified in the additional targeted support status. If a Title I school is again identified for the additional targeted support status, it moves to the comprehensive support and improvement status.</p> <p>MN’s description includes the number of years within which schools are expected to meet such criteria; schools are identified on a three-year cycle.</p> <p>The exit criteria ensure continued progress to improve student academic achievement and school success.</p> |

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| | <p>The plan describes how schools continue Additional TSI status if meeting either of two conditions below:</p> <ol style="list-style-type: none"> 1. The student group for which the school was identified performs below the performance of the lowest 25 percent of Title I schools in any Stage 1 indicator (math achievement, reading achievement, or progress toward English language proficiency). 2. The student group for which the school was identified fails to show improvement on all indicators, which led to the initial identification. |
| <i>Strengths</i> | The criteria require many factors to ensure that the subgroup for which the school was identified improves. |
| <i>Weaknesses</i> | The plan could be strengthened if it included how the exit criteria align with MN's long-term goals and MIPs, and further explained how the goals and MIPs take into account the improvement necessary to close statewide proficiency and graduation rate gaps. |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 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.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?

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| <i>Peer Analysis</i> | <p>MN describes the more rigorous state-determined action required for schools identified for comprehensive support and improvement that fail to meet the state's exit criteria within three years.</p> <p>The increased supports and interventions are aligned with state supports and requirements under Minnesota statutes (World's Best Work Force).</p> <p>MN will require an external in-depth needs assessment to inform the local comprehensive needs assessment and identify more rigorous supports, root causes, and gaps in access to effective teachers for underserved students.</p> <p>Additional interventions may include more rigorous interventions, such as school closure, school conversion to a magnet or charter, significant staffing changes such as "fresh-starting" the school, replacing leadership, requiring student support services, or providing students the choice to attend other schools.</p> |

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| | <p>Districts with re-identified schools will be required to implement strategies to increase access to experienced, qualified, and effective teachers for underserved students at the school and classroom levels.</p> <p>MN will have increased requirements for use of funds for re-identified schools. Schools will be required to set aside a minimum of 20% of Title I funds to support implementation of the amended school support and improvement plan.</p> |
| <i>Strengths</i> | MN clearly has focused on root cause analysis in situations where performance does not improve, and has included evidence-based practices, operations, budgeting, staffing, and school day/year changes as possible adjustments. |
| <i>Weaknesses</i> | The language in the plan could be stronger, as some activities appear to be optional (i.e., “may”, rather than “must” or “will”). |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 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?

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| <i>Peer Analysis</i> | <p>MN describes how it will annually review resource allocation to support school improvement in each LEA in the state serving a significant number or percentage of schools identified for CSI or TSI.</p> <p>Grantees are required to conduct full program evaluations to demonstrate results and revise work plan activities and budgets. Program evaluation reports are collected from grantees every six months. The program evaluation is based on 12 measures.</p> <p>MN will evaluate these districts annually to assess how they are using the school improvement funds to address inequities. The regional centers will meet more regularly with these districts. These centers will review different components and conduct program evaluation quarterly, semiannually, and annually.</p> |
| <i>Strengths</i> | <p>MN will make funds available to the districts serving the highest proportion of schools identified for CSI or TSI, as well as to regional service agencies serving these schools.</p> <p>Evaluation activities will examine leadership, implementation of continuous</p> |

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| | improvement activities, accountability results, and professional development outcomes. Adjustments to allocations may be made by the state and regional center directors. |
| <i>Weaknesses</i> | |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 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> |
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| <i>Peer Analysis</i> | <p>MN describes in detail the technical assistance that it will provide to each LEA in the state serving a significant number or percentage of schools identified for CSI or TSI.</p> <p>The technical assistance is likely to improve student outcomes.</p> <p>MN states that it will employ two strategies to provide differentiated technical assistance to schools and districts that helps them conduct comprehensive needs assessments, select appropriate evidence-based interventions and strategies, develop and implement school support and improvement plans, and address resource inequities.</p> <p>MN will grant Title I school improvement funds to the districts serving the most significant numbers of identified schools and will provide direct supports to districts and schools that do not receive grants for school improvement.</p> |
| <i>Strengths</i> | <p>MN provides a very comprehensive description of the technical assistance it will provide to each LEA serving a significant number or percentage of schools identified for CSI and TSI.</p> <p>The collaboration between the state and its educational service cooperatives (six Regional Centers of Excellence) appears strong.</p> |
| <i>Weaknesses</i> | <p>While MN developed a Theory of Action that defines priorities for how the state will approach supports for identified schools and reinforces the focus on eliminating achievement gaps and inequities while improving outcomes for all students, the accountability system does not completely align with the Theory of Action, as the use of “counter-groups” seems to de-emphasize equity.</p> |
| <i>Did the SEA meet</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) |

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|--------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| <i>all requirements?</i> | <input type="checkbox"/> No (0 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> |
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| <i>Peer Analysis</i> | MN describes 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 CSI and TSI and that are not meeting the state’s exit criteria, or in any LEA with a significant number or percentage of schools implementing TSI plans. MN will use existing state law to require districts not making sufficient progress toward improved teaching and learning in any consecutive three-year period to use up to 2% of basic general education revenue for school improvement strategies and practices. |
| <i>Strengths</i> | MN is focused on use of all available funding streams to improve student outcomes. |
| <i>Weaknesses</i> | |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 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> |
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| <i>Peer Analysis</i> | <p>MN provides a definition for ineffective, out-of-field, and inexperienced teachers.</p> <p>MN describes the extent that low-income children and minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by out-of-field and inexperienced teachers, <u>but not by ineffective teachers</u>.</p> <p>MN describes the measures it will use to evaluate and publicly report progress in the state report card, as well as extensive activities that the state is engaged in to address lack of equity in teacher access.</p> |
| <i>Strengths</i> | <p>MN recognizes access gaps, is working with a stakeholder group to address gaps, and is engaging LEAs in equitable access planning to address issues at the LEA level. MN will report such data on the state report card</p> <p>MN is focused on issues beyond equitable access by low-income and minority children, such as efforts to increase access to minority teachers.</p> |
| <i>Weaknesses</i> | <p>The data provided is at the school level, but within-school gaps may also exist. If the state has access to teacher student connection data, it should also analyze within-school gaps.</p> |
| <i>Did the SEA meet all requirements?</i> | <p><input type="checkbox"/> Yes (0 peer reviewer(s))</p> <p><input checked="" type="checkbox"/> No (4 peer reviewer(s))</p> |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | <p>MN must provide data (missing from Equitable Access Gaps Table) to describe the extent that low-income children and minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by <u>ineffective</u> teachers.</p> |

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

- Does the SEA describe how it will support LEAs receiving assistance under Title I, Part A to improve school conditions for student learning?
- Does the SEA’s description include how it will support LEAs to reduce incidences of bullying and harassment?

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

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

| | <i>Peer Response</i> |
|--------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Peer Analysis</i> | <p>MN describes how it will support LEAs receiving assistance under Title I, Part A to improve school conditions for student learning.</p> <p>MN’s description includes how it will support LEAs to reduce incidences of bullying and harassment.</p> <p>MN’s description includes how it will support LEAs to reduce the overuse of discipline practices that remove students from the classroom.</p> <p>MN’s description includes how it will support LEAs to reduce the use of aversive behavioral interventions that compromise student health and safety.</p> |
| <i>Strengths</i> | <p>MN is focused on building local capacity to improve student learning conditions, providing tools and resources as well as technical assistance and training to LEAs in an effort to address bullying and harassment, appropriate discipline practices, and positive behavior interventions.</p> <p>MN will undertake this work by supporting LEAs, rather than attempting to address all activities solely from the state level; PBIS training has already been widely provided statewide.</p> <p>The state seeks input through advisory councils on these topics.</p> <p>MN’s plan recognizes students with disabilities and students with disabilities who are Black or American Indian as populations needing focus regarding discipline. It draws on programs with established records of success, such as Check and Connect.</p> |
| <i>Weaknesses</i> | |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 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> |
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| <i>Peer Analysis</i> | <p>MN describes how it will support LEAs receiving assistance under Title I, Part A in meeting the needs of students.</p> <p>MN is taking an active role in encouraging local efforts to smooth transition to kindergarten for families and students. The state and Child Care Aware of Minnesota are collaborating on a joint effort to develop and implement a sustainable service that will provide elementary school principals with the names and contact information of the early childhood programs in their school's enrollment area.</p> <p>MN supports the planning for students' successful transition to postsecondary and employment through a variety of initiatives.</p> <p>MN is providing options for students who need an alternative path to a high school diploma.</p> <p>MN describes how it will support districts in meeting the transition needs of students, including those at risk of dropping out.</p> |
| <i>Strengths</i> | <p>MN's description of initiatives supporting transition to post-secondary education and employment was especially strong.</p> <p>MN has developed a diverse portfolio of programs to support students as they transition through school, including CTE programs, career planning, and other unique opportunities.</p> <p>MN provides information on specific student populations that need support in successful transitions, such as students with disabilities.</p> |
| <i>Weaknesses</i> | <p>One reviewer could not find adequate information specific to the transition of students to middle grades. While MN has a screening tool to assist educators in tracking and supporting student progress toward graduation from high school, and the tool provides a snapshot of students in grades six and nine who are at increased risk of not completing high school in four years, there is no specific initiative focusing primarily on the transition of students to middle grades.</p> |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s)) |
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | <p>One reviewer noted that MN must provide additional details on specific initiatives to support the transition of students into middle grades.</p> |

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> |
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| <i>Peer Analysis</i> | <p>MN describes a robust process that was undertaken in 2016 by a robust group of stakeholders to establish statewide entrance and exit procedures for ELs.</p> <p>MN provides an assurance that all students are assessed within 30 days of enrollment. MN screens the potential English learners by using the WIDA Screener, online and paper, for grades 1-12 and the W-APT or WIDA MODAL for kindergarten.</p> <p>MN notes that their English learner population grew more than 300% in the past 20 years.</p> <p>Beginning with 2015-2016, all schools started using WIDA ACCESS for ELLS 2.0. During the 2017, three working groups started defining MN policies on English proficiency definition, additional standardized English learner criteria, and EL procedures.</p> <p>MN defines English proficiency on the ACCESS 2.0 as an overall composite score of 4.5 or higher, with three of the four domains above or equal to 3.5.</p> <p>The entry into the English language support program is based on the newly revamped Minnesota Language Survey (MNLS).</p> <p>MN has included additional criteria that may be considered for exit, which are uniform across districts within the state.</p> |
| <i>Strengths</i> | <p>MN demonstrated meaningful consultation and collaboration with stakeholders.</p> <p>MN has created a manual (MN Standardized Statewide EL Procedures) to be used by every district and charter school for the identification, entrance, and exit of English learners.</p> |
| <i>Weaknesses</i> | |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 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> |
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| <i>Peer Analysis</i> | <p>MN describes how it will assist eligible entities in helping to ensure that English learners meet challenging state academic standards.</p> <p>MN provides technical assistance to districts receiving state aid for English learners; all MN districts who have one English learner qualify. Technical assistance is focused on districts who have large number of English learners with limited and/or interrupted schooling, long-term English learners (LTELs), large number of ELs and ELs with low rates of student growth towards English proficiency.</p> <p>Technical assistance varies based upon the district’s need, but could include telephone calls, visits, emails, webinars and conferences. MN has also conducted numerous trainings and professional development for district and school staff working with the English learner population, including: direct one-on-one principal leadership training, data training and understanding its use in the district and school level, WIDA trainings both for K-12 EL and content teachers as well as pre-K teachers, and participation trainings during professional organization’s conference.</p> <p>MN also provides tools and resources related to ELs on the state website.</p> |
| <i>Strengths</i> | <p>In the summer of 2017, MN began conducting a comprehensive needs assessment (CNA) of the local educational agencies including charter schools. In the fall of 2017, the EL team (including stakeholders) will identify the needs of districts in assisting the students in reaching both English language proficiency goals and challenging academic standards. Initial priorities from the CNA will then be used to set a priority of needs, research potential solutions, select solutions and develop an action plan.</p> |
| <i>Weaknesses</i> | |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (0 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> |
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| <i>Peer Analysis</i> | <p>The SEA describes 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.</p> <p>All districts applying for Title III funds must submit a comprehensive needs assessment based upon EL data, progress towards proficiency, and meeting the recommended growth targets. Based upon the CNA, districts design an English language development program which supports their students' needs.</p> <p>Annual monitoring reviews of districts are conducted. These reviews are either conducted at the department level (desk reviews) or at the district level (onsite reviews). Both types of reviews ask the district to provide evidence and support of critical compliance elements that follow the federal requirements of Title III, including nonpublic consultation, teacher qualifications, program data desegregation and equity for all ELs.</p> <p>If the district is unable to meet the criteria required during the monitoring, the district, assisted by MDE staff, establishes a corrective action plan with specific goals and timelines for district and student improvement.</p> <p>English learner specialists provide support to pre-K through grade 12 schools and districts. This support includes data gathering and analysis with districts; professional development for both EL and non-EL staff on specific district needs; and delivery and training of specific topics statewide.</p> <p>MN's staff is working with the Regional Centers of Excellence staff who are working directly with schools which are in the bottom percentiles of English learner's growth towards English language performance. Using the School Improvement Theory of Action, the specialists work with specific underperforming districts to improve outcomes for ELs and conditions for teaching and learning.</p> |
| <i>Strengths</i> | <p>MN is focused on the use of evidence-based resources and the review of programming to ensure EL students are making progress.</p> <p>MN is multiplying its efforts by working with regional center staff to support districts and schools.</p> |
| <i>Weaknesses</i> | <p>MN does not sufficiently 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.</p> |
| <i>Did the SEA meet all requirements?</i> | <p><input type="checkbox"/> Yes (0 peer reviewer(s))</p> <p><input checked="" type="checkbox"/> No (4 peer reviewer(s))</p> |

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|--------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i> | MN must more thoroughly describe the <u>steps to further assist</u> eligible entities if the strategies funded under Title III, Part A are not effective, as the plan does not indicate whether work with the regional centers offers more of the same support, or additional supports. |
|--------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|