STATE PLAN
PEER REVIEW CRITERIA
Peer Review Panel Notes Template

STATE: Missouri

U.S. Department of Education
April 5, 2017

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)?

	Peer Response
Peer Analysis	The Missouri state plan provides some information on the opportunity to take advanced mathematics coursework in middle school, but lacks information on the opportunity to be prepared for advanced mathematics in elementary and early middle school grades. The plan assumes stakeholders are knowledgeable about the state's mathematics course and assessment structure described in detail in a different document, Missouri's June 2015 flexibility waiver request, submitted to the USDOE for approval within the last 2 years. Thus, the state's plan provides minimal information on the Missouri mathematics course taking and aligned assessment plan. The Missouri plan has no description of state implementation support for rigorous coursework prior to grade 8 to prepare students for advanced mathematics coursework.
Strengths	The state provides flexibility in grade 8 mathematics testing dependent on the mathematics course taken in grade 8. Students are allowed to take different sequences of advanced mathematics courses, potentially beginning as early as

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[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).

	grade 6, completing three advanced mathematics courses by the end of grade 8.
Weaknesses	The Missouri state plan does not provide state strategies to ensure all students receive preparation for advanced mathematics coursework. The state plan does not identify steps or actions to be implemented in grades prior to grade 8 to prepare students for advanced mathematics coursework. The Missouri state plan does not identify the required mathematics course required for all students by the end of grade 8 in the context of their state academic standards. Thus, stakeholders do not have a transparent picture of what constitutes access to advanced mathematics coursework in Missouri. The Missouri state plan indicates a variety of options for taking advanced coursework starting potentially as early as grade 6 and completing three advanced mathematics courses by the end of grade 8. Yet, the state does not provide information on how they will handle the assessment of students who take an advanced mathematics course prior to grade 8 as well as how mathematics assessment will be carried out for these students in high school.
Did the SEA meet all requirements?	☒Yes (1 peer reviewer(s)) ☒ No (3 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The Missouri state plan should describe the course-taking patterns from elementary to middle school to show all students are being prepared for advanced mathematics coursework in grade 8. The description should include the implemented state strategies to be used to support schools as they move toward preparing all students for advanced mathematics coursework in grade 8. The Missouri state plan needs to provide more detail on the minimum mathematics course expected to be completed by all grade 8 students and how grade level state mathematics academic standards/benchmarks will be addressed in mathematics courses prior to grade 8 for students preparing for advanced mathematics coursework. The Missouri state plan needs to clarify the source and structure of the EOC assessments (e.g., standards/benchmarks assessed) to ensure the rigor/depth of knowledge and reliability of the various EOC assessments is maintained for all students regardless of the order and grade level completion of mathematics coursework, specifically in relation to the geometry and algebra II EOC assessments whether administered in middle or high school.

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

A.3.i: Definition

➢ Does the SEA provide its definition of "languages other than English that are present to a significant extent in the participating student population"?
➢ Does the SEA identify the specific languages that meet that definition?
➢ Does the SEA's definition include at least the most populous language other than English spoken by the State's participating student population?
➢ In determining which languages are present to a significant extent in the participating student population, does the SEA describe how it considered languages other than English that are spoken by

distinct populations of English learners, including English learners who are migratory, English learners who were not born in the United States, and English learners who are Native Americans?

➢ In determining which languages are present to a significant extent in the participating student population, does the SEA describe how it considered languages other than English that are spoken by a significant portion of the participating student population in one or more of the State's LEAs, as well as languages spoken by a significant portion of the participating student population across grade levels?

	Peer Response
Peer Analysis	The Missouri plan defined the threshold for languages other than English present to a significant extent as 5 percent of the statewide tested population (p. 12). The tested population is the unduplicated count of students participating in a given content assessment the prior year. Missouri has determined Spanish is the most populous language other than English in the statewide accountability system with 2.41 percent of the tested population in English Language Arts and 2.45 percent in mathematics. The Missouri plan did not provide data for other languages, rather just mentioned other languages spoken as part of the plan introduction (p. 7). The Missouri plan did not provide any data analysis to justify 5 percent is an appropriate threshold. The inclusion of a table with specific numbers of students by race/ethnicity enrolled in the state's schools would have provided clear, transparent evidence of the small numbers of non-English speakers in the community. Providing stakeholders with raw numbers and allowing them to draw their own conclusions opens the doors to trust between the state and its stakeholders.
Strengths	The Missouri plan defines 5 percent as the threshold for languages other than English being present in the state's tested population. Summary statistics are provided for the state's most populous language other than English, Spanish. The Missouri plan promises to alter procurement to include assessments in a language meeting the threshold should the need arise. The Missouri plan indicated support from stakeholders for the threshold.
Weaknesses	The Missouri plan does not define the student demographic variable being used to determine students included in numerator of summary statistic, 'non-English language code' (e.g., primary home language, student's native language; p. 12). The Missouri plan only provided summary data for students whose non-English code is Spanish, while the plan's introduction listed other languages spoken by the state's English learners (i.e., Arabic, Vietnamese, Bosnian, and Swahili; p. 7). The Missouri plan did not provide evidence to justify that 5 percent is an appropriate threshold for their state.
Did the SEA meet all requirements?	☒Yes (4 peer reviewer(s)) ☐ No (0 peer reviewer(s))
If no, describe the specific	

information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	The Missouri plan states that the state's assessment system does not have any existing academic assessments in languages other than English (p. 13).
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☒Yes (4 peer reviewer(s)) ☐ No (0 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	Missouri definition results in no assessments in languages other than English are required. Per the state's definition of significant populations (i.e., 5 percent or more), there are no languages other than English that are present to a significant extent in the participating student population.
Strengths	The Missouri plan stated the state's assessment did not need assessments in other languages (than English) though they have identified Spanish as the language spoken by nearly 2.5 percent of the tested student population (p. 13). The state has determined Spanish assessments are not needed because the 2.5 percent of the tested population does not meet the state's defined 5 percent threshold.
Weaknesses	One reviewer was concerned the number of Spanish speaking students was large enough for the state to consider providing assessments, or at least accommodations, in Spanish.
Did the SEA meet all requirements?	☒Yes (4 peer reviewer(s))

	☐ No (0 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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:
  - o 1) gather meaningful input on the need for assessments in languages other than English;
  - o 2) collect and respond to public comment; and
  - o 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?

	Peer Response
Peer Analysis	The Missouri plan focuses on a reactive process related to the need for non-English assessments by issuing an assessment system request for proposals to develop academic assessments in languages other than English after the language reaches the state's 5% threshold. The plan does not identify how the state will monitor increases in non-English speaking test populations and its impact on assessment development, timing of assessment administration, type of assessments, or rationale for administering assessments in languages other than English. The expense of developing a standardized assessment is a logical reason for planning from a reactive perspective, but it also has the potential to create a level of distrust among the student group being impacted since there will be a large gap in time from when the assessments are needed until they can be administered.
Strengths	The Missouri plan acknowledged several opportunities for working groups to discuss the need for non-English state accountability assessments. Missouri commits to developing assessments in other languages should the size of the population meet or exceed their stated threshold. The Missouri plan indicated the state assessment system would issue a request for proposals (RFP) for assessment development for tests in languages other than English once a non-English population reaches the state's 5% threshold (p. 13).

Weaknesses	The timeline in the Missouri plan only discusses executing an RFP. The timeline for developing assessments in languages other than English is estimated to be three years from the issuance of the RFP to implementation of a non-English accountability assessment. The plan does not mention implementing other interim actions if the non-English speaking test-taking population increases.
	The Missouri plan does not provide a timeline or action plan for analyzing changes in the percentage of native languages for students in the tested population. The actions would include re-evaluating the need for assessments in another language than English.

	Missouri's description related to gathering meaningful input on the need for other language assessments lacked details for the two sets of meetings conducted (p. 13):
	   a) the ESSA assessment work group lacked information on the proportion of participants with potential input on the need for non-English assessments as well as how the issue was addressed and
	   b) the Migrant and English Learner Program meetings lacked information on number and composition of participants.
	The Missouri plan reported stakeholder input from only 75 stakeholders participating in work group meetings. The number of stakeholders and workgroups mentioned in the Missouri plan is relatively small considering there are 518 school districts.

Did the SEA meet all requirements?	☐ Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The Missouri plan must describe a brief annual process that will be used to review and discuss the need for non-English assessments. The process should focus on monitoring and planning for growth in non-English speaking test takers with regular input from stakeholders.
	The Missouri plan should provide a comprehensive timeline for anticipating non-English assessment need and implementation of interim actions and accommodations until a valid and reliable non-English accountability assessment can be administered.

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?

	Peer Response
Peer Analysis	The Missouri plan provided the required information on racial/ethnic student groups needed to satisfy this section of the ESSA plan (p. 14). The Missouri plan could be strengthened if the state took an extra step to provide a table of

	enrollment data so stakeholders can get a sense of the number and proportion of each student group in the state's accountability system.
Strengths	The Missouri plan identified the following subgroups in their accountability system as required by ESSA: Black (not Hispanic), Asian/Pacific Islander, Hispanic, American Indian/Alaska Native, White (not Hispanic), and Multi-Racial (p. 14).
	All major racial/ethnic subgroups are listed for reporting and accountability purposes as well as three non-racial/ethnic student groups (i.e., economically disadvantaged students, students with disabilities, and English learners), while others are listed just for reporting purposes. This allows the state to report data on the performance of additional subgroups to consider, including military affected, foster, gifted and homeless children.
Weaknesses	The Missouri plan did not include any specific data for these subgroups, however. A table showing subgroup population type, count, and percent would give readers more information.
Did the SEA meet all requirements?	☒Yes (4 peer reviewer(s)) ☐ No (0 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	*The Missouri accountability system has no additional student groups included.*
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☐Yes (0 peer reviewer(s)) ☐ No (0 peer reviewer(s)) ☒ Not Applicable (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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.din 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)?

	Peer Response
Peer Analysis	Missouri selected "Applying the exception under ESEA section 1111(b)(3)(A)(i)" .
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☒Yes (4 peer reviewer(s)) ☐ No (0 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	The Missouri plan indicates the state has chosen 30 as its minimum group size for accountability (p. 15). This determination is reportedly based on guidance from Title I regulations issued on April 9, 2007. The Missouri plan needs to also explicitly state if will be the same for each student group disaggregation and analysis; it increases the transparency of the accountability system.
Strengths	The Missouri plan mentions an accountability work group was convened to specifically address accountability measures required by ESSA and the consensus of the group was that an N-size of 30 was appropriate.
Weaknesses	One peer reviewer would urge the state to consider reducing the N-size for accountability purposes. N-size of 30 for accountability purposes is on the upper end of what is defensible; the performance of a number of subgroups will be obscured resulting in schools not needing to account for moving the

	group's performance forward.
Did the SEA meet all requirements?	☒Yes (4 peer reviewer(s)) ☐ No (0 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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]

	Peer Response
Peer Analysis	The Missouri plan does not indicate how the state's stakeholders and/or technical staff evaluated selecting the minimum N-size of 30 as the most value for Missouri. The state is relying on an Institute of Education Sciences (IES) published report which identifies a minimum group size of N=30 as best practice. The plan needs to provide evidence the minimum group size of N=30 is the right number for Missouri.
Strengths	The Missouri plan determined the minimum group size of N=30 through consultation with an accountability working group. The determination of this working group is that an N-size of 30 falls within accepted norms of practice (p. 15).
Weaknesses	The Missouri plan follows Title I guidance when selecting the minimum group size of 30, yet no evidence is included to show N=30 does not exclude any groups that may be struggling or succeeding on state assessments. The Missouri plan does not address reliability and statistical validity of school accountability data using the selected minimum N-size. The Missouri plan did not include the citation for the April 9, 2007 Title I regulations that support an N-size of 30 as the minimum large group size. One reviewer would like additional information to know what bounds were

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[2] Consistent with ESEA section1111(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.

	considered and whether the working group had any concerns about such a high n-size for accountability purposes.
Did the SEA meet all requirements?	☐ Yes (1 peer reviewer(s)) ☒ No (3 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The plan should include data detailing how the minimum number of students in a group will impact the inclusion of all students for a school level analysis. The data should provide evidence of the consistency and stability of school level analysis across years, especially comparing results across the wide range of school and district sizes from a total of 23 students to 25,670 students (p. 7).

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?

	Peer Response
Peer Analysis	Although Missouri convened groups to discuss minimum group size, the plan lacks details on what information was presented for consideration and why the stakeholders recommended N=30 (p. 15). There is no evidence in the Missouri plan to support why N=30 was selected or any mathematical modeling to confirm that a significant number of students are not being excluded due to the large group size. The composition of the collaborative groups needs to be documented to ensure different kinds of expertise were involved in the decision making process.
Strengths	The state determined these rates using accepted norms of practice that balance privacy with transparency in reporting and accountability.
Weaknesses	The Missouri plan provides no description on how the N-size was determined and provides no data supporting the chosen N-size of 30. The plan suggests the criteria for selection of the minimum student group size is based on Title I guidance. The Missouri plan has no evidence to show what student groups would be excluded in calculating various accountability measures or indicators when student group size is 30. A study analyzing the differences and reliability of accountability measures for various group sizes would strengthen the state's response and selection of N=30. The Missouri plan omitted information on the composition of the accountability work group which addressed the issue of minimum group size (p. 15). The plan did not provide details on the information presented and discussed by the work group. The Missouri plan would be strengthened if it fully explained the statistical analysis used to evaluate the exclusion of student groups less than 30.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information	The Missouri plan needs to describe the collaboration between technical staff, policy makers, school leaders, teachers, and parents. The description should

or clarification that an SEA must provide to fully meet this requirement	show how the collaboration process strengthened the selection of the minimum student group N-size. The Missouri plan needs to provide detailed information about why N=30 was selected (e.g., mathematical modeling, advice from experts, and outcome impact based on various group sizes that do not reveal personally identifiable information and does not exclude a significant number of students and schools from being held accountable).

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]

	Peer Response
Peer Analysis	The Missouri accountability system is relying on using the work of an external organization to justify the minimum N-size of 30 is sufficient for individual student privacy.
Strengths	The Missouri plan used recommended best practices of the National Center for Educational Statistics Data Quality Campaign (p. 15) to ensure the minimum number of 30 is sufficient to ensure individual privacy for accountability measures and indicators.
Weaknesses	
Did the SEA meet all requirements?	☒Yes (4 peer reviewer(s)) ☐ No (0 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response

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[3] See footnote 5 above for further guidance.

Peer Analysis	The state made a choice to use a different minimum student group size for publicly reporting performance results to the public. The Missouri plan established N=10 as the minimum number of students for reporting results, including indicators and their various components (p. 16); this value is different from its accountability group size of N=30. The selection of a different reporting number will require additional analysis of the reported results for assurance of individual student privacy.
Strengths	Some reviewers considered Missouri's data suppression policy being informed by the best practices of the National Center for Educational Statistics Data Quality Campaign was a positive asset of this plan.
Weaknesses	Some reviewers considered the Missouri plan reference to the National Center for Education Statistics, without inclusion of specific justification for why IES work supports the needs of their state to ensure privacy and statistical reliability (p. 16, top of page), was not sufficient to justify a minimum reporting student group size of N=10.
Did the SEA meet all requirements?	☐ Yes (2 peer reviewer(s)) ☐ No (2 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The Missouri plan must provide justification for using a student group size of 10 for reporting accountability results, including consideration of important state school characteristics which might lead to a minimum group size different than what is suggested by a national statistical organization.

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 time line the same multi-year length of time for all students and for each subgroup of students?
➢ Are the long-term goals ambitious?

	Peer Response
Peer Analysis	The Missouri plan lists ELA and mathematics long-term academic goals in Appendix A (p. 69-71) for both the Missouri Assessment Program (MAP) Performance Index (MPI) and the proficiency rate. Long-term academic goals for all ESSA required subgroups are included, but the tables lack the 2016 baseline data (p. 17) for each subgroup. Since grade level tables are not presented, a stakeholder may assume the expected ten-year change for each student group, for either MPI or academic

	proficiency, is applicable to all tested grade levels as well as any combined set of tested grades. The burden of proof lies with the state to show the same table can be used for combining any collection of grades in a school or for a single grade analysis.
	The long-term goals appear to be ambitious for all student groups, except special education, with the current lowest performing student groups making the largest increases over the next ten years.
Strengths	The Missouri plan states they will reduce by half the rate at which students fail to achieve proficiency in the next 10 years; note this is the proficiency rate measure.
	The MPI measure for academic performance includes at least one point for every student earning an achievement level on a state accountability test; students with "below basic" achievement levels earn one point for the school while students with "advanced" achievement levels earn five points.
Weaknesses	There is inconsistency in the calculation of long-term goals among subgroups; specifically special education (i.e., students with disabilities) is different than the remaining groups. The Missouri plan Appendix A shows the proficiency rate long-term goal for the special education subgroup is 49.0% for ELA and 40.0% for mathematics, a 20% change from the 2016 baseline of 29% for ELA and 20% for mathematics. If the special education group was expected to "reduce by half the rate at which students fail to achieve proficiency", similar to other student groups, the 2026 special education proficiency rate long-term goals would be 64.5% for ELA and 60.0% for mathematics, changes of 35.5% and 40% respectively. Thus, the special education academic achievement increases for both MPI and proficiency rate are significantly lower than the other student groups. The Missouri plan acknowledges the special education changes from 2016 to 2026 are an exception and the long-term goals are based on the state implementation plan for the Individuals with Disabilities Education Act (IDEA), but no additional explanation or plan for special education was discussed. With such a discrepancy in expectations, the state needs to align its special education academic achievement long-term goals with the process used for other student groups.
	The ELA and mathematics MPI and proficiency rate tables in Appendix A (p. 69-70) should include the baseline year for all data to show the starting point. The Missouri plan identifies 2016 as the baseline year (p. 17) for calculating the targets, while the tables start with 2017.
	The Missouri plan does not provide detailed information on how they set the MPI long-term goal. The Missouri plan indicates the relationship between MPI and proficiency rate is: "approximately one-percent change in proficiency rates will produce a one-point change in the MPI". For example, if the ELA 'all student' group proficiency rate changed 18.6 points (62.9% in 2016 to 81.5% in 2026), then the ELA 'all student' MPI long-term goal would be 345.5 in 2026 (2016 MPI, 326.9, plus proficiency rate change, 18.6). The relationship between MPI and proficiency rate in the Appendix does not appear to follow the expected relationship: MPI changed 25.7 points from 2016 to 2026, rather than the expected 18.6 points.

	The year-to-year change for each student group is approximately the same over the 10-year period reported in Appendix A, frequently with the larger changes occurring in the latter years. Statistically, the probability of making a given size change decreases as the proficiency rate approaches 100%.

The Missouri plan provided little explanation of why they chose to approach their long-term achievement goals in a reduction method rather than an improvement method. The long-term goal is the same by 2026, while not being transparent for students, teachers, parents, and other stakeholders. The plan provides little explanation as why Missouri decided to approach achievement in this manner: ". . . MO-DESE believes that our students will be successful and competitive if we address their learning rather than simply the competitive standing of the state." (p. 16) The Missouri plan would be strengthened if the language discussed the goals from a positive, rather than negative, perspective which would be consistent with data reported in Appendix A.

The Missouri plan states the accountability system will be using the least transparent academic achievement measure, MPI. The Missouri Department of Elementary and Secondary Education (MO-DESE) prefers the use of the MPI for goal setting and school evaluation due to its value of improvement at all levels, yet MO-DESE acknowledges stakeholders find proficiency rates easier to understand.

The Missouri plan has inconsistent reporting of goals: indicates the 2026 mathematics MPI is reported as 360.9 on page 17 and 352.6 on page 69 in Appendix A. The MO-DESE is encouraged to check for these discrepancies. |
| *Did the SEA meet all requirements?* | ☐Yes (0 peer reviewer(s))
☒ No (4 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | The Missouri plan must include the correct baseline data (2016 per text p. 16) for both the MPI and proficiency rate tables in Appendix A.

The Missouri plan must provide a detailed description of how they determined the 2026 long-term MPI goals shown in Appendix A tables (pp. 69-70).

The Missouri plan must recalculate the special education academic achievement long-term goals (and interim progress targets) to align with the ESSA process used for other subgroups. The results will need to be used to update the Appendix A tables (pp. 69-70). |

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?

	Peer Response
Peer Analysis	The Missouri plan meets the criteria for both the MPI and proficiency rate academic achievement interim progress targets over a 10-year period from

	2017-2026 (see Appendix A, pgs. 68-70). Separate tables are provided for mathematics and ELA with interim progress targets for all required subgroups.
Strengths	The Missouri plan provides annual performance targets through 2026, which include measurements of interim progress (pgs. 16 and 69). The interim progress values reported in Appendix A appear to be scientifically calculated and rounded to the nearest tenth. Targets are provided for both all students as well as required subgroups. The tables include a column showing the average yearly change for each student group. The Missouri plan acknowledges administration of new assessments will require recalculation of the interim progress targets for both ELA and mathematics. The description of the MPI (p. 72, top of page) suggests the MPI score reflects both status and progress metrics, yet the details of how the measure is calculated includes no variable reflecting student progress from year to year. The interim progress data, as well as the overall accountability data, do not address the issue of the improvement in the counter groups for a) the economically disadvantaged students, b) children with disabilities, and c) English learners, which is necessary to ensure the progress in the all student group.
Weaknesses	The up and down variation in the change of the interim progress targets from year-to-year is confusing since no specific pattern can be identified. It may be related to data rounding which would be partially eliminated by reporting to more decimal places. The plan would be strengthened by including a footnote explaining the variation. The amount of change in early years for each student group is the same as later years. The plan would be strengthened by suggesting larger changes in early years and smaller changes as the MPI score increases or as the proficiency rate approaches 100%. There is inconsistency in the calculation of interim progress targets for special education (i.e., students with disabilities) compared to other student groups. Response to this concern in the previous section should also address this interim progress concern.
Did the SEA meet all requirements?	☒Yes (3 peer reviewer(s)) ☒ No (1 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The Missouri plan must recalculate the special education academic achievement interim progress targets (and long-term goals) to align with the ESSA process used for other subgroups. The results will need to be used to update the Appendix A tables (pgs. 69-70).

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?

	Peer Response
Peer Analysis	The MIP and proficiency rate tables in Appendix A (pages 68-73) show the average step over ten years is greater for student groups whose baseline (2016) is lower than other student groups for both ELA and mathematics. The change pattern for interim progress targets and long-term goals also provides evidence of greater annual improvement rates for student groups whose baseline is lower than other student groups.
Strengths	The Missouri plan Appendix A MIP and proficiency rate tables reflect larger average changes for student subgroups that are farther behind. These differences result in closing the gaps between student groups over the 10-year period.
	Each stakeholder can use the tables to put her/his interpretation on the meaning of the data related to closing the achievement gap.
Weaknesses	The Missouri plan identifies the special education group as an exception which will reflect the goals listed in Missouri's IDEA state implementation plan, not available in the plan being reviewed. Response to this exception in the two previous sections should also provide clarification for this section.
	The Missouri plan would be strengthened with a table showing the achievement gaps being closed (e.g., White – Black, White – Hispanic, Not Eligible for Free/Reduced Lunch – Eligible for Free/Reduced Lunch, etc.)
	The data table would be strengthened by including the counter group data for three student groups: economically disadvantaged, students with disabilities, and English learners. The addition of the counter groups would permit all the achievement gaps to be calculated.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The Missouri plan must recalculate the special education academic achievement long-term goals (and interim progress targets) to align with the ESSA process used for other subgroups. The results will need to be used to update the Appendix A tables (pp. 69-70).

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?

	Peer Response
Peer Analysis	The Missouri plan provides graduation rate long-term goals for the four-year adjusted cohort for 'all students' and for required subgroups listed in Appendix A of the Missouri plan (p. 70), yet a correction is needed. The calculation is similar for all student groups, except special education; the graduation rate long-term goals need to be calculated the same way for all groups. When completed, the graduation rate long-term goals will be ambitious, especially for current low performing student groups. The baseline data for graduation rates needs to be included in the Appendix A table.
Strengths	The Missouri plan states they will reduce by half the rate at which students fail to graduate in the next ten years. The Missouri plan includes a table in Appendix A to identify the graduation rate long-term goals for the four-year adjusted cohort from 2017 to 2026.
Weaknesses	The Missouri plan graduation rate annual increases are modest for some student groups, yet reflect the MO-DESE expectations for the 10 year change across all groups. The Missouri plan language in the goal section suggests attention to opposite approaches to LEA and school outcomes (p. 16): e.g., the first strategic goal focuses on 'all students to graduate from high school' yet states the 10-year target as 'reducing by half the rate at which students fail to graduate'. Similar conflicting language appears in relation to proficiency within the same paragraph outlining the graduation goal. The tables in Appendix A and B address the positive, rather than the negative, values expressed in the 10-year target statements in the text of the Missouri plan. The Missouri plan does not include the baseline data in Appendix A or in the body of the document. All groups except students with disabilities comply with the state's goal. The Missouri plan states the special education group has a graduation rate long-term goal that is aligned to the approved state plan for IDEA (p. 18). The ESSA criteria for graduation rate long-term goals does not allow for any exceptions for a student group. The Missouri plan Appendix A Long Term Goals and Measures of Interim Progress—Graduation Rates shows lower graduation rates for the long-term goal (2026) than the previous year, 2025, for all student groups. The value displayed in the 2026 column appears to reflect a value from a prior year varying from the 2022 to 2024 column.
Did the SEA meet all requirements?	☐Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that	The Missouri plan must include the baseline data (2016) in the Appendix A graduation rate table (p. 70). Due to the lag in graduation rate results, the plan will need to clarify which year's four-year adjusted cohort is the baseline.

an SEA must provide to fully meet this requirement	The Missouri plan must correct the 2026 graduation rate long-term goal (p. 70) so there is not a decrease in the graduation rate from 2025 to 2026. The Missouri plan must adjust the special education graduation rate long-term goal so it is consistent with the way the goal was calculated for the other student 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?

	Peer Response
Peer Analysis	The Missouri plan indicates extended-year adjusted cohorts are not used for calculating the graduation rate (p. 18).
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☐ Yes (0 peer reviewer(s)) ☐ No (0 peer reviewer(s)) ☒ Not Applicable (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	The Missouri plan only addresses interim progress values for the four-year adjusted cohort graduation rate. The graduation rate table in Appendix A (p.

	70) provides all the data necessary to meet the requirements of this section of the plan, assuming the state includes the baseline data required in the previous section.
Strengths	The State provides annual interim progress targets through 2026. This practice helps set direction for the state, LEAs and schools. Targets are provided for the 'all' student group as well as all required subgroups (p. 69). The method of calculation for the interim progress for graduation is the same as the method of calculation for academic progress giving consistency to the process across measures.
Weaknesses	The Missouri plan shows only a .5% increase each year for the special education graduation rate interim progress targets which does not achieve the necessary, and consistent, graduation rate long-term goal in 2026. The state needs to adjust the data to reflect the change in the special education graduation rate long-term goal in the previous section.
Did the SEA meet all requirements?	☒Yes (3 peer reviewer(s)) ☒ No (1 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Missouri must adjust the special education graduation rate annual interim progress targets so it is consistent with the way the interim progress targets were calculated for the other student groups.

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?

	Peer Response
Peer Analysis	The inclusion of the ten student groups in the graduation rate table, in Appendix A of the Missouri plan, provides the information needed to meet the criteria related to closing the statewide graduation rate gaps.
Strengths	The Missouri plan Appendix A graduation rate table reflects larger average changes for student subgroups that are farther behind. These differences result in closing the gaps between student groups over the 10-year period. Each stakeholder can use the Appendix A graduation rate table (p. 70) in the Missouri plan to put her/his interpretation on the meaning of the data related to closing the graduation rate achievement gap. The method of calculation for the interim progress for graduation is the same as the method of calculation for academic progress which gives consistency to the process.
Weaknesses	The Missouri plan indicates the rate of improvement for the special education group is an exception from the other student groups. The exception is not

allowed for graduation rate interim progress targets and long-term goals. The state will need to revise the special education interim progress targets and long-term goals.

The Missouri plan would be strengthened with a table showing the achievement gaps being closed (e.g., White – Black, White – Hispanic, Not Eligible for Free/Reduced Lunch – Eligible for Free/Reduced Lunch, etc.)

The data table would be strengthened by including the counter group data for three student groups: economically disadvantaged, students with disabilities, and English learners. The addition of the counter groups would permit all the achievement gaps to be calculated.

Did the SEA meet all requirements?	☐Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The Missouri plan must revise special education graduation rate long-term goals to take into account the improvement necessary to make significant progress in closing statewide graduation rate gaps.

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?

	Peer Response
Peer Analysis	The Missouri plan does not address the long-term goal for English language acquisition to include all 10 years of the Missouri plan. The table, Appendix A table C: Long Term Goals and Measures of Interim Progress—Achieving English Proficiency (p. 71), identifies the percentage of students making progress toward English language proficiency in each year based on the number of years they have received EL services; the table reports the same data used under NCLB. The plan does not provide justification for only providing goals for part of the plan duration. The rigor of the interim and long-term goals needs to be reviewed and revised so ELs are on track for career success.
Strengths	
Weaknesses	The Missouri plan's Appendix A provides a table of Long Term Goals and Measures of Interim Progress—Achieving English Language Proficiency (p. 71) which only provides data through 2022, rather than the 10-years being

	used for proficiency rate and MPI scores. The plan provides no justification for a 'long-term' goal for 2022, rather than 2026. The discussion included in the plan describes the state's efforts to identify the correlation between scores on two different versions of the WIDA assessments for EL students, Access 1.0 and Access 2.0. The study discussed in this section of the plan appears to be about identifying the minimum score on Access 2.0 needed to have a high probability of being proficient on the state accountability ELA and mathematics tests, the score being labeled AEP in the text. This information is not relevant to the criteria for this section. The reported long-term goal for 2022 lacks rigor. The baseline data for 2016 identifies current low rates of progress towards English language proficiency for both students with less than 4 years (8.8%) and students with 4 or more years (10.7%) of English learner educational opportunities while the long term goals over the identified 6 years are only a 6% increase for each group (14.8% and 16.7%, respectively). The plan lacks a definition of how the state decides which students have made progress toward English language acquisition. Since the state notes that students with 4 or more years of EL instruction have a higher probability of becoming academically proficient (p. 20), stakeholders would expect performance targets for that group to be greater than appear in the table in Appendix A (p. 71). The state needs to rectify this discrepancy.
Did the SEA meet all requirements?	☐Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The Missouri plan must clarify why the plan only shows a 5-year table for English language acquisition proficiency (p. 71), rather than 10 years. If Table C is correct, the state needs to provide a timeline for resetting to include 2026. The state must review the rigor of their current long-term goals and either adjust to more ambitious long-term goals or justify the current goals.

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?

	Peer Response
Peer Analysis	The interim progress targets through 2022, rather than 2026, toward the long term goal are included in the table in Appendix A, C: Long Term Goals and Measures of Interim Progress—Achieving English Language Proficiency. Addressing the 2022 versus 2026 in the prior section will clarify what needs to be done for this section. The interim progress targets (percentage of students expected to make progress toward English language acquisition) are not ambitious and are carried over from the NCLB waiver. Developing a preliminary growth-to-target table for exiting EL services within six years and using it to model the

	past pattern of percentage of students making progress toward English language acquisition would inform the policy making decisions to increase rigor of the interim progress targets.
Strengths	Table C on page 71 shows progress expectations for English Learners with less than four as well as four or more years of English language of instruction.
Weaknesses	A clarification of the table in Appendix C is needed. Work done to address the concerns from the previous section will determine what remains to be done for the interim progress targets. Progress in Table C on page 71 is very low and does not reflect the same 10-year span shown in the other tables.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (0 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	The academic achievement indicator is based on a combination of ELA and

	mathematics performance in a school or LEA. The calculation of the Academic Achievement indicator is not dependent on the identified long term goals, but the interpretation and evaluation of the indicator is dependent on the relationship between the calculated value and the state goal. The plan needs to be explicit about all calculations and values to be used for the interpretation and evaluation process with information on validity and reliability.
Strengths	The Missouri plan describes the indicator, says the calculation is consistent across schools and LEAs with averaging across three years, and shows how the MPI is calculated (pp. 72-73). The indicator is can be disaggregated for sub-groups and measures proficiency. ELA and mathematics MPI scores are weighted equally in the final composite indicator.
Weaknesses	While the Missouri plan recognizes proficiency rate is more understandable for stakeholders, they are relying on the MPI for their final calculations. The Missouri plan is inconsistent in using MPI and proficiency interchangeably. The Missouri plan provides no validity or reliability data for: a) each content MPI averaged measures which are components of the Academic Indicator, and b) the Academic Indicator. The Missouri plan states the MPI will be evaluated for the Academic Indicator (p. 22). The plan provided no information about what is adequate improvement. The plan did not provide details about whether the MPI evaluation is done using a yearly MPI score, the 3-year average MPI by subject, or the average of both the ELA and mathematics 3-year averages. The plan provides no information to indicate if the state goal is the single number listed in the tables in Appendix A or if the state goal is averaged the same way as each school and LEA MPI scores are calculated using averaging. The Missouri plan indicates new ELA and mathematics state accountability assessments will be administered in Spring 2018, yet there is no information on how the three-year averaging process for the academic performance indicator will be addressed for initial identification of schools.
Did the SEA meet all requirements?	☐Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The Missouri plan must include details on how the MPI score is evaluated to show both improvement over time and distance from the state's goal for all students (see statement page 22) as part of the Academic Indicator. Include details about the validity and reliability of the MPI evaluation for each content area as well as the combined score when ELA and mathematics are combined. The Missouri plan must provide details on the calculation of the Academic Indicator, including calculations for the three year MPI averages for each content area and the combining of the ELA and mathematics content scores. The Missouri plan must show a proactive plan of data analysis to effectively combine results across the administration of a new version of the state accountability tests that will be implemented for initial school differentiation. The Missouri plan must justify how the MPI index measures grade level

| | proficiency given it includes points for Basic and Below Basic achievement levels. |

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?

	Peer Response
Peer Analysis	The growth model described in the Missouri plan is designed to create a balance between improving stability of the effect estimates and the state's desire to help LEAs and school quickly demonstrate improvements (p. 79). Appendix D provides a comprehensive description of the value-added model (VAM) calculations (pp. 79 – 86). The Missouri plan should address both the reliability and validity of the VAM score, especially given the recent concerns related to the reliability of VAM scores. The methodology can be used for all students and subgroups of students.
Strengths	The Missouri plan identifies the use of a VAM that compares individual ELA and mathematics performance against expected results in grades 3-8. The calculation considers many factors that influence outcomes including student mobility.
	Ranked results are created based on the normal curve equivalents (NCE) and calculated based on a combined 3-year average. Results can be disaggregated for all major sub-groups.
	The technical calculations of the VAM and the NCE appear to be accurate.
Weaknesses	The growth model uses a relative growth measure calculated annually using three years of data. The rolling annual calculation of the growth score for a given prior year score limits the use of this growth score in school improvement goal setting as well as individual student goal setting.
	The Missouri plan provides no information on how the state will handle schools with less than 30 students in a group with a prior year assessment to

	meet the minimum group size requirements.

The Missouri plan went to great lengths in Appendix D (pgs. 79-86) to describe the technical calculation associated with their VAM to arrive at an NCE for the other academic indicator for elementary and middle schools. While the technical calculation appears to be accurate, the plan did not provide any hypothetical examples of how the VAM would impact a school's index score nor did it fully explain in user-friendly terms, the purpose of the VAM and how it would be used in the accountability system.

A VAM is difficult for the public to understand, especially those not well-versed in statistics and technical calculations such as parents, students, and communities in general. Understanding is important in a state's education accountability system. Unfortunately, there is little understanding or explanation (beyond the calculation) in Missouri's plan for the Other Academic Indicator.

Since the VAM is a relative measure of growth, the Missouri plan should explain why the VAM score was not extended into the high school grade span. |
| *Did the SEA meet all requirements?* | ☒Yes (4 peer reviewer(s))
☐ No (0 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | |

A.4.iv.c: Graduation Rate

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

➢ Can the indicator be disaggregated for each subgroup of students?

	Peer Response
Peer Analysis	The Missouri plan needs to systematically respond to all the requirements for the graduation rate indicator section. The indicator will be a three-year average of the four-year adjusted cohort graduation rates; the plan lacks details on how the average will be calculated. The plan did not provide any evidence of the validity or reliability of the Graduation Rate Indicator.
Strengths	The State describes the Graduation Rate Indicator as a single component, a three-year average of the four-year adjusted cohort graduation rate. The Graduation Rate indicator can be disaggregated by subgroup. There is no state-defined alternate high school diploma, thus simplifying the complexity of the analysis of the Graduation Rate Indicator.
Weaknesses	The Missouri plan needs to systematically respond to all the requirements for this section of the plan. At least half the requirements can be addressed with an affirmative statement, requiring no calculations. Several of the requirements are not relevant for this state since they only use the four-year adjusted cohort. The Missouri plan does not mention how an individual school graduation rate is calculated and averaged for the Graduation Rate Indicator when the four-year adjusted cohort does not meet minimum group size for one or more years. The Missouri plan does not describe how the indicator is based on the graduation rate long-term goal for the 'all' student group. The Missouri plan does not address the reliability and validity of the graduation measure. Determining the reliability and validity of the graduation rate indicator will require the application of a formal calculation which can be documented in an appendix.
Did the SEA meet all requirements?	☐Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The Missouri plan must specifically discuss how the graduation rate indicator is used to evaluate progress toward the graduation rate long-term goal for all students. The Missouri plan must provide more information about its methodology for determining the graduation rate indicator. The description should ensure the indicator is valid and reliable.

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?

	Peer Response
Peer Analysis	Multiple factors related to development of English language proficiency are used to determine the Progress in Achieving English language Proficiency Indicator. The index score will be a whole number between 0 and 20 making it difficult to show how the indicator is based on progress toward the state's graduation rate long-term goals. The limited range of possible discreet scores will limit using this indicator to differentiate between schools serving English learners. Interpretation of the same score for different schools is expected to be difficult without knowing the underlying components; there is a concern of comparability of scores across schools. Calculations of reliability and validity of the indicator will need to be included in the plan. The index scores can range from 0-20 with up to 3 points awarded to schools for participation rate of English learners in WIDA ACCESS 2.0; up to 5 points for the percentage of students achieving AEP; and up to 12 points for growth shown by each English learner on WIDA ACCESS 2.0. The state has set progress to proficiency rates beginning with the 2015-16 school year through 2021-22 on two different scales: 1) students with less than four years of instruction; and 2) students with four or more years of instruction. Those with more than four years of instruction have a higher expected proficiency rate (p. 24; Appendix A-Table C, page 71; Appendix C, pp. 74-78).
Strengths	The Missouri plan's Progress in Achieving English Language Proficiency indicator uses a 3-factor index score that includes a component reflecting the 95% participation requirement, one for academic English proficiency, and one for growth-to-target on ACCESS 2.0. The Missouri plan's description of the EL program, including entry and exit processes, is aligned to and based on Missouri's language proficiency assessment requirements and timelines.
Weaknesses	The Missouri plan does not provide assurances that the WIDA assessment is available to all LEAs nor that the same indicator will be used by all LEAs statewide. The Missouri plan does not provide assurance the indicator consistently measures progress of all ELs in each tested grade. The Missouri plan indicates the technical information for this index score is included in Appendix C, yet the information available in Appendix C only addresses the AEP, not the other components. The Missouri plan suggests each factor has a range of points: 1) participation factor, 0 to 3 points; 2) percentage of students achieving AEP, 0 to 5 points; 3) growth shown by each unit of study, 0 to 12 points (p. 24). The plan does not provide information on how a

	school earns those points. The plan does not provide details on the validity and reliability of the individual components and the composite indicator, English Acquisition Index.

The purpose of the table C: Long Term Goals and Measures of Interim Progress—Achieving English Language Proficiency values needs to be clarified in the text of the Missouri plan. The percentage of students making progress to English language acquisition is being assigned a range of scores, rather than using the actual percentage, which turns the data into a categorical, rather than continuous, variable and potentially masking school differences. For example, percentage of students making progress to English language acquisition initially is any number between 0 and 100, including decimal values, yet this will be assigned a number from 0 to 12 in the Progress in Achieving English Language Proficiency. When this is combined with two other measures, which are percentages assigned a value with even narrower ranges, the power to differentiate school performance is limited. |
| *Did the SEA meet all requirements?* | ☐Yes (0 peer reviewer(s))
☒ No (4 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | The Missouri plan must provide detail on how points are earned for each of the factors in the index score. A detailed example showing the calculation of a sample school index score may be useful to provide clarification.

The Missouri plan must explicitly ensure the WIDA ACCESS 2.0 assessments are available to all LEAs and schools, including both the entrance and exit assessment tools. The assurances must include all EL students in grades 3-8 and during grades 9-12.

The Missouri plan must provide justification for how the Progress in Achieving English Language Proficiency Indicator effectively measures the proficiency progress of all English learners. |

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?

Peer Response

Peer Analysis	The state provides most required information. As written on page 24, Missouri will use the percent of students attending school 90% of the time as its school quality or student success indicator. Missouri will use a 3-year average to determine the percent of students meeting the indicator and then an NCE will be calculated and used in ranking. The state accountability system uses the same School Quality/Student Success indicator for all schools and LEAs. The variable is identified as the Chronic Absenteeism indicator in a later section (p. 26). The indicator can be compared across grades, student groups, schools, and LEAs. The reliability and validity of this indicator have not been evaluated. The state has shown no relationship between the Chronic Absenteeism indicator and school success; this correlation would justify its inclusion in the state accountability system. Missouri will use the percentage of students attending school 90% of the time as their School Quality/Student Success indicator. Three years of data will be averaged to determine the percent of students attending school at least 90% of the time (p. 24).
Strengths	There is one indicator used for school quality and student success – attendance. Specifically, the measure is the percentage of students that attend 90 percent or more of the time. This indicator applies to all schools, subgroups and all grade spans and will help differentiate school performance. (p. 24) The use of multi-year averaging and NCE reduces challenges schools may have when in some school years student attendance is lower than expected. The state's school quality indicator is a rank ordering of the standardized three-year average of the percentage of students in the school or LEA who attended school at least 90% of the time (p. 24). By converting the three-year average to an NCE score, the indicator is comparable across schools. While not explicitly stated, the decision to use school attendance as the School Quality/Student Success indicator may be related to the "90/90" principle of the Missouri School Improvement Program (MSIP) in which 90 percent of students must be in attendance 90 percent of the time (p. 7).
Weaknesses	Plan lacks information on whether the indicator is calculated in a consistent way. The threshold is also quite modest and lags, masking those students who are chronically absent in a way where early intervention could change life trajectories. Missouri's plan also fails to show that all LEAs use the same indicator. While attending school is important and has been well documented, there is no support documenting the rationale for Missouri selecting student attendance as its school quality/student success indicator. There is also no establishment of validity or reliability for its methodology. The Missouri plan does not address the reliability and validity of the percentage of students attending school 90% of the time as an indicator of school quality or student success.

	The Missouri plan does not provide specific details on how the school quality indicator is calculated and assumes their brief two sentence description (p. 24) is sufficient for all stakeholders to arrive at the same interpretation of the calculation. Missouri did not provide any justification or supporting documentation as to why school attendance was chosen as the School Quality/Student Success indicator. Other than the mention on page 7 in regard to the MSIP, the Consolidated Plan does not include any clues as to their decision.
Did the SEA meet all requirements?	☐Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The Missouri plan needs to provide evidence of the reliability and validity of the percentage of students attending school 90% of the time as an indicator of school quality or student success. Citation of evidence-based studies showing the impact of this variable on student performance would also help support the use of the variable as a quality indicator. Missouri must provide information as to why attendance was chosen to meet this requirement of the plan, along with how the indicator is valid, reliable, and comparable statewide. Missouri needs to provide assurance that the indicator is calculated in a comparable and consistent manner across all LEAs statewide. Missouri needs to provide more information that supports the selection of student attendance as its school quality/student success indicator and show the methodology used to determine the attendance rate and NCE is valid and reliable.

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?

	Peer Response
Peer Analysis	As stated on pages 25 and 26, Missouri describes its annual index score determination process for its Title I schools. The index will be calculated for each subgroup of 30 or more students present at each school. Missouri will use NCEs for all indicators to normalize the scales so that weighting of the indicators is proportional. Five indicators are presented in the response. However, some schools may have only four indicators based on their grade arrangement. Additionally, the dataset can be used to determine an index score for each subgroup that meets the N-size

	criteria. Missouri will use ranking of Title I schools to identify a threshold that will be used to recognize its lowest 5%. Missouri will also identify all high schools whose graduation rate is less than 67%.
	Schools not serving grade 12 will not have a graduation rate and schools not serving grades 3 through 8 will not have an Academic Progress indicator. The information available in the plan does not identify how the state handles schools serving both grades 3 through 8 and grade 12.
Strengths	The determination score, which combines all the indicators, can be calculated for the 'all student' group and each subgroup separately. Only the determination score for the 'all student' group will be used for identifying the 5% of the lowest performing Title I schools while the different subgroup determination scores will be used to identify "consistently underperforming" subgroups.
	Missouri has created an index score based on all of the required indicators. The Missouri plan describes five different factors used to determine a summative index score to differentiate school performance. Academic Achievement and Attendance/Chronic Absenteeism are the two factors to be used in the calculations for each school. Either the Academic Progress factor or the Graduation Rate factor will be used depending on whether the school serves students in grade 12 or not. The English language acquisition factor may or may not be included, depending on the size of the EL student group in a school.
	The index score will be calculated for each school and subgroup larger than 30. Given the difference scales, the state must calculate NCEs to construct the index. In the event a school does not have an NCE for all indicators, the weight will be redistributed throughout the other indicators as identified on page 26. There is an added business rule for high schools with low rates of high school graduation.
Weaknesses	The Missouri plan described the meaningful differentiation process as only including schools receiving Title I, Part A funding, yet the annual meaningful differentiation first criteria requires inclusion of all public schools.
	Some reviewers have concern when not using continuous data for meaningfully differentiating schools. Four of the five factors included in the state's index score are based on continuous data, allowing the ranking to be based on distinctly unique values, while the fifth factor, English language acquisition, is based on a limited range, 0 – 20 points, of whole number values. The English language acquisition factor is limited to one of 21 values making it difficult to create clear rankings of the schools or LEAs.
Did the SEA meet all requirements?	☐Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Missouri must describe how it will establish a system of annual meaningful differentiation that includes all public schools in the state.

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?

	Peer Response
Peer Analysis	Missouri provides a chart that shows weights of the indicators on page 26. The plan provides clear information on how the different indicators are weighted in the index score, including the adjustments made when one of the indicators is not available for a school. The equal weighting of the Academic Progress and Graduation Rate indicators creates an equivalent structure between high schools and schools not serving grade 12. More information is needed to determine how this functions when a school serves both grades 3 through 8 and grade 12.
	The weighting of the different factors in the index score creates a number of different scenarios to consider when analyzing this differentiation data. The state may need to document a study on the equivalence of the different weighting options to ensure comparability of schools regardless of the weighting
	For schools where English learners are not present or with an N of below 30, the English language proficiency points will be redistributed to graduation rate at a 3.75 multiplier and to chronic absenteeism (attendance) with a 1.25 multiplier (p. 26).
Strengths	Missouri described weights applied to each indicator. These weights combine with the results to form an index score. The relative weights applied across each indicator appear sound and provide both substantial weight individually as well as appropriately prioritize academic achievement and growth, outweighing the school quality indicator. Missouri also provides an adjustment in cases where the indicator cannot be calculated which accounts for unusual case situations.
	Missouri uses weighted NCEs. Each NCE is weighted prior to summing all five factors to determine the final index score; the Academic Achievement indicator has the largest weighting, the School Quality/Student Success indicator has the smallest weighting. This meets the requirement of the achievement, academic progress, graduation rate, and English language acquisition indicators being of much greater weight than the school quality/student success indicator.
Weaknesses	There is no rationale for how points are redistributed when there are fewer than 30 EL students. There are no sample scenarios to show the impact of the weights for schools that do not have values for all 5 indicators to show there are no negative consequences. In many cases, only students who meet

	attendance or enrollment requirements are included in the determination of accountability. Students who do not meet the requirements are excluded. When the English language acquisition factor is not applicable, three of the other four factors are given greater weight. The Academic Progress or Graduation Rate weighting will change from 3 to 3.75 and the Attendance/Chronic Absenteeism factor weighting will change from 1 to 1.25. The Academic Achievement weighting will remain at 4. The Missouri plan has no justification for why these specific redistributed adjustments are selected, nor evidence that index scores for schools with and without the English language acquisition factor are comparable.
Did the SEA meet all requirements?	☒Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	The state does not use a different methodology for differentiating.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☐Yes (# peer reviewer(s)) ☐ No (# peer reviewer(s)) ☒ Not Applicable (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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)?

	Peer Response
Peer Analysis	Missouri will use index scores to rank schools as described on page 26. Beginning in fall 2018, the state will identify Comprehensive Support and Improvement schools. Though there is detailed data on the calculation of the index score, the description of the methodology used to identify the lowest performing schools is brief in this section and depends on interpreting information from other sections. More information is needed about the inclusion of the different student groups either before or during the ranking of the schools. If the state is using only the "all students" group to determine the lowest performing Title I schools, it will need to provide justification for omitting the other nine student groups. Missouri estimates there will be approximately 62 schools identified using the index score method (representing the lowest five percent of Title I schools). Due to new assessments in ELA and math in the Spring of 2018, Missouri will first identify schools for Comprehensive Support and Improvement in Fall 2018 and then recalculate the index scores every three years after that.
Strengths	There is a clear methodology that will result in a school ranking with not less than 5 percent of schools being identified. Schools will first be identified based on this methodology in Fall 2018. There is a high school trigger as well as a means to identify schools with chronically low-performing subgroups. Exit reviews of Comprehensive Support and Improvement schools will occur every three years. Targeted Support Schools that fail to meet state exit criteria in three years will be identified for Comprehensive Support and Improvement. The methodology references the detailed calculations in the differentiation section (pp. 25 – 26). Being proactive, the state is projecting to identify 62 schools for targeted support based on being the lowest performing Title I schools and 6 high schools for comprehensive support who are not meeting the graduation rate criteria.
Weaknesses	Examples of the different scenarios would strengthen the state's response. The timeline should communicate what will occur up to 2026/2027. The methodology available in the plan provides a clear understanding how an index score is calculated for a single student group. However, the methodology

	is not clear how a single index score is calculated to be inclusive of all relevant student groups in a school or LEA. The single score is necessary to rank order the Title I schools to identify the lowest performing five percent. The listed timeline (p. 28) for identifying low-performing schools does not include the full 10-years included for the long-term goals given the lack of a baseline year. The timeline in the state plan does not address what will happen with schools currently receiving targeted support and improvement who do not meet exit criteria in the Fall 2018 when the next cohort of low-performing schools is identified. Text (p. 27, #3) indicates these schools would continue to be included in targeted support and the Fall 2021 line of the time line table (p. 27) indicates schools not meeting exit criteria from the Fall 2018 low performing cohort will continue in target support. The timeline needs to reflect consistency and alignment between text and table information. An example of a hypothetical ranking would provide clarity.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (0 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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)?

	Peer Response
Peer Analysis	Missouri has stated throughout the plan its intention to use a four-year graduation rate. For accountability purposes a rolling three-year average will be used (p. 27), rather than a single year's graduation rate.
Strengths	Missouri has proactively identified at least 6 high schools that will not have a graduation rate of more than 67 percent.
Weaknesses	The state does not provide a well-defined methodology that will be used to determine the graduation rate indicator and identify high schools for Comprehensive Support and Improvement (CSI) or Targeted Support and Improvement (TSI). The methodology needs to ensure the rolling three-year

	average does not lead to underperforming high schools narrowly avoiding receiving comprehensive supports.
	Missouri did not provide a timeline for identification, although one could assume it is the same as that for identifying the lowest five percent of schools receiving Title I funds.
	The plan indicates the "all student" group will be used for identification of high schools for CSI support. To create more transparency of equity concerns in the state accountability system, the plan would be strengthened with details on how all the subgroup Graduation Rate Indicators will be used to more effectively identify high schools needing CSI support.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The Missouri plan must outline the methodology to be used for identifying public high schools failing to graduate one-third or more of their students, including a timeline. The state must explain how the graduation rate for the different student groups is incorporated into the identification of the schools failing to graduate one-third or more of their students.

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)?

	Peer Response
Peer Analysis	Missouri will move targeted support schools to comprehensive support schools if they fail to meet the state's exit criteria in three years and begins in fall 2021.
Strengths	The Missouri plan indicates schools identified for additional targeted support that do not meet the criteria for exiting within three years will be identified as CSI schools.
Weaknesses	The timeline is not explicitly stated in the text and must be inferred from information contained in the table on p. 28. Missouri provides an approach but lacks a clear and detailed methodology, as noted in section A.4.vi.e and A.4.vi.f. .
Did the SEA meet all requirements?	☐ Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific	Missouri must include a detailed description of its methodology to identify additional TSI schools that have failed to meet the exit requirements, including a

information or clarification that an SEA must provide to fully meet this requirement qui	clear timeline.

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?

	Peer Response
Peer Analysis	Missouri has established three years as its frequency to identify schools for comprehensive support and improvement. Schools will be first identified in the fall of 2018. The first three-year review will occur fall 2021. The plan clearly indicates that identifying low performing Title I schools and high schools with low graduation rates for comprehensive support will occur every three years, but does not consistently incorporate that action in timelines with consistent actions happening each time schools are identified. Attention to creating consistency in the timeline will help.
Strengths	Schools will be identified every three years. Missouri's timeline accounts for new assessments to be given in the Spring of 2018 which puts identification of schools for Comprehensive Support and Improvement in the Fall of 2018.
Weaknesses	The timeline and discussion of implementation of the identification process is not consistently documented in all tables. The identified dates for identifying schools fails to include the baseline year and only covers part of the 10-year length of this plan.
Did the SEA meet all requirements?	☒Yes (4 peer reviewer(s)) ☐ No (0 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	Missouri will use the same methodology (as that of identifying schools for Comprehensive Support and Improvement) to rank schools that for two consecutive years have one or more consistently underperforming subgroups. These schools will be identified for Targeted Support and Improvement. But more detail would provide transparency for the state accountability system. The state needs to refine its definition of 'consistently underperforming' student groups to clarify the schools that need additional support. The methodology needs to verify all the indicators are being used in determining schools with a 'consistently underperforming' student group.
Strengths	Schools that have one or more subgroups in need of comprehensive support for two consecutive years will be identified as having an underperforming subgroup. The index score allows for the ranking of schools every three years. This timeframe provides sufficient time for schools to determine if specific interventions are making a difference in student learning.
Weaknesses	A detailed methodology needs to be justified with supporting information projecting the number of schools and their 'consistently underperforming' student group. These projections should be used to ensure the selection process does not over identify a student group, schools with similar grade spans, or schools in certain education settings such as metro or rural. The description of the methodology needs to ensure student performance rather than other factors such as economic status or student group size is influencing selection. There is no methodology for identifying "consistently underperforming" subgroups presented in the Missouri plan. Moreover, the plan may have confused terminology when defining "consistently underperforming" by using the term 'comprehensive' support when the definition was under the targeted support title. If 'comprehensive' support was indeed the intended terminology, the Missouri plan would only address graduation rate for high schools. The Missouri plan should describe methodology for identifying only one or two consistently low-performing student groups in schools currently not receiving targeted services. The state could potentially compare performance of a small number of students in one school to a large number of students in the low performing schools. An example of a hypothetical ranking would provide clarity.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or	Missouri must include a detailed description of its methodology to identify schools with consistently underperforming subgroups. The methodology should include a clear description for identifying schools and of "consistently

clarification that an SEA must provide to fully meet this requirement	underperforming" subgroups. Sample scenarios would also be useful.

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?

	Peer Responses
Peer Analysis	Missouri's plan describes schools who will be identified for additional targeted support (p. 29); it does not provide a clear methodology to be applied for selection of the schools. The identification will first occur in 2018 and additional schools will be identified every two years thereafter.
Strengths	Beginning in 2018, any school that has subgroups that would lead to identification for comprehensive support will receive additional targeted support. Identification will occur every other year.
Weaknesses	Throughout this section, Missouri does not provide clear methods used to identify schools that need additional support.
Did the SEA meet all requirements?	☐Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Missouri must provide details on the methodology that will be applied every two years to identify the schools being identified for additional targeted services.

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?

	Peer Response
Peer Analysis	Missouri states on page 29 that it will include one additional statewide category of schools. Schools included in this category do not administer a state accountability assessment and only have a single indicator of school

	quality or success. It is implied, but not specifically stated, that these schools would be K-2. The requirement is explained; however, there is no clear justification for the addition.

Including the additional school category potentially provides support for more schools to receive feedback on their student population. |
| *Strengths* | The state identifies one additional category of schools – schools that administer no assessments and have only a single indicator of school quality. If the absenteeism rate is comparable to other schools identified as needing improvement, Missouri will conduct a site visit and analyze student outcomes in subsequent grade levels. This provides the state with a way of handling unusual case situations.

Including schools that do not administer state assessments or the WIDA ACCESS 2.0 in the statewide accountability system is commendable and demonstrates Missouri's commitment to all students and schools. |
Weaknesses	Missouri should give examples of what types of schools are included in this category (e.g. K-2 schools)
Did the SEA meet all requirements?	☒Yes (4 peer reviewer(s)) ☐ No (0 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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)?

	Peer Response
Peer Analysis	Missouri's plan indicates on page 29 that it requires a 95 percent participation rate on their state assessment. This participation rate expectation is for all LEAs, schools, and subgroups. The state has set high consequences for schools that fail to have at least 95 percent participation in the ELA and math assessments. Schools and all subgroups failing to meet the 95 percent threshold will not earn points for the academic achievement portion of the state's system for meaningful differentiation of schools.

It would help to provide additional information on how this "all or nothing" decision will affect some of the student groups, especially those with large proportions of students with out-of-school factors affecting their attendance such as homelessness. |

Strengths	Any school that misses the 95 percent participation rate threshold fails to earn points for academic achievement in the state's academic index. The same criteria will be applied to all subgroups. This provides a suitable incentive for schools to encourage maximum participation. Missouri's commitment to all students participating in state assessment is evident by its willingness to not provide academic achievement points if the participation rate is less than 95 percent. Missouri emphasizes the importance of participation on statewide assessments by setting high consequences for schools that do not meet the 95 percent participation rate.
Weaknesses	Missouri could provide a scenario for how the loss of 4 academic achievement points will impact a school's overall index score.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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)?

	Peer Response
Peer Analysis	Missouri requires comprehensive support and improvement schools to score above the original (2018) improvement threshold for at least two of the most recent three years to meet exit criteria.
Strengths	Identified schools must score above the original improvement threshold for two of the most recent three years. This approach acknowledges the challenges that struggling schools experience as they work toward improvement and matches the timeline for re-identification of schools.

Weaknesses	The state needs to provide evidence that the criteria does not result in a 'revolving door' of schools that cannot move into sustainable improvement out of the bottom 5% of Title I schools. The data analysis needed to support the strength of the variation in exit criteria for low performing schools would help more effectively refine the measures being used to identify low performing schools.

The threshold index score will be different every three years when a new group of low performing school is identified. Missouri could draw a stronger connection between the exit criteria and schools' long-term performance goals. Even if schools were to meet the original threshold after several years they will be well behind where they need to be compared to the newer - and higher - thresholds.

The plan does not set a maximum number of years for which a school could remain in targeted support without meeting the exit criteria. Therefore, a school not meeting exit criteria during one three-year period could potentially be retained for additional targeted support for multiple three-year periods.

The plan does not provide any data analysis showing schools who successfully meet the exit criteria are able to sustain a positive trajectory of positive improvement. The state should have data on at least three cohorts of low performing schools to justify the exit criteria is sufficiently rigorous to ensure continued system improvement within the state. |
| *Did the SEA meet all requirements?* | ☒Yes (2 peer reviewer(s))
 ☒ No (2 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | Missouri must include an analysis of prior low performing school cohorts and their improvement to demonstrate that continued progress to improve student academic achievement and school success is possible and can be sustained. |

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)?

	Peer Response

Peer Analysis	Missouri has established exit criteria for schools receiving additional targeted support. The exit criteria for schools receiving additional targeted support are generally focused on a single student group performance, rather than multiple student groups. The state would strengthen their exit criteria by including attention to the trends of performance of the school's student groups not identified as needing improvement; doing so would ensure the school would not experience a drop in performance of other student groups while focusing on the one initially showing low performance. Missouri requires schools identified for Additional Targeted Support to improve at a rate congruent with the rate for that subgroup for at least two of the most recent three years (p. 30).
Strengths	The identified subgroup must improve at a rate congruent to the rate of that subgroup as identified in the long-term goals and measurements of interim progress for at least two out of the last three years. This approach ensures that both pressure and support are provided to accelerate underperforming student subgroups. Exit criteria are based on the yearly goals listed in Appendix A. The exit criteria are also based on improvement for at least two of the most recent three years. The exit criteria described in the plan rely on the use of the interim targets and long terms goals defined in Appendix A. These exit criteria have a well-defined pattern and do not have the variation occurring with the threshold index scores used for other exit criteria. The exit criteria require two consecutive years of positive performance that can be sustained after the additional targeted support is no longer available. The timeline of three years matches the timeline for re-identification of schools. The allowance for the school to show improvement of the identified subgroup in two of the three years recognizes that there may be a year in which the school fails to improve as much but, overall, improvement has occurred.
Weaknesses	Missouri's response fails to address the continued progress necessary to close both statewide proficiency and graduation rate gaps. The plan does not identify the number of years that a school can access additional targeted supported once a student group is identified as consistently low performing. The plan does not address achievement gaps for the identified student group being tracked for the school.
Did the SEA meet all requirements?	☒Yes (3 peer reviewer(s)) ☒ No (1 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	One peer review felt that Missouri must address the continued progress to improve student academic achievement and school success needed to close both statewide proficiency and graduation rate gaps.

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?

	Peer Response
Peer Analysis	Missouri describes rigorous interventions requiring the LEA to select evidence-based interventions related to their needs, participate in professional development, and collaborate with Area Supervisors of Instruction (ASIs). The actions listed are not clearly aligned to the principles of school turnaround or highly effective school improvement practices. But the plan describes more process rather than the actual interventions. The process includes an analysis of the original interventions and possible reasons as to why the interventions did not produce the desired results. The state plan would be more transparent by listing the evidence based interventions to ensure school staff are aware from the start of planning of what the state considers quality interventions. Given the strategies included in the state's outline of technical assistance, the state might also return to Hattie's meta-analysis to review what has a significant effect size on student learning, moving away from infrastructure toward instructional change.
Strengths	Missouri will require a new review of why the school failed to make progress along with a comprehensive needs assessment, which may be conducted by an entity outside of the LEA. Contracted specialists will provide school coaching pursuant to a 30, 60 and 90 day action plan. Missouri will assign LEAs additional support staff. MO-DESE staff will conduct with LEAs needs assessments, monitor the fidelity of implementation of interventions, and implement principal coaching. Missouri will provide additional help to the schools via school improvement specialists to assist the schools that have failed to meet the exit criteria.
Weaknesses	The plan does not describe any rigorous interventions to be implemented. The length of time before more rigorous improvement interventions are implemented is a default value reflected when the next cohort of low performing schools will be identified. The plan needs to be more aggressive in using ongoing data and frequent program evaluation to make adjustments early, prior to the end of the first three years, in the improvement process. The plan suggests that more of the same things done during the first three years with more frequent check-ins with external support staff are sufficiently rigorous.

Did the SEA meet all requirements?	☐Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Missouri must include a more thorough description of the more rigorous and progressive interventions needed for schools that fail to meet the exit criteria within the three year time frame. The plan should include evidence that these interventions are likely to lead to a successful outcome.

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?

	Peer Response
Peer Analysis	Missouri will review the Annual Secretary of the Board report each year to determine resource allocations for comprehensive or targeted support improvement schools beginning 2019. With schools needing improvement first identified in the Fall of 2018, the 2019 timeline for review is appropriate. However, Missouri does not provide any information on the actions it will take to address any of the findings other than that resource allocations will be included on the annual report card (p. 31).
Strengths	Missouri will review resource allocations to determine if resource inequities exist among schools identified in need of support.
Weaknesses	The plan needs to provide more details about the data to be used to evaluate resource allocation in schools. Attention needs to be given to how the evaluation process will work for both large and small LEAs since the current description in this plan involves comparison across schools within an LEA. There is no required action other than publication on a report card. The response does not provide details about the report. Key components are missing: what are the datasets, how does school size impact allocations, who conducts the audit, what are the allocation of resources for non-comprehensive or targeted support improvement schools, what are the consequences if there are inequities. The plan assumes stakeholders are familiar with the Annual Secretary of the Board Report (ASBR) and how this process can be used to compare the distribution of resources across a district. The plan lacks details identifying and justifying the variables and process being used to determine inequities between school buildings in LEAs with schools receiving targeted improvement support. The process needs to address implementation in LEAs with multiple buildings serving similar grade levels as well as implementation in small LEAs who might have only one building for each grade level structure (e.g., Primary, Upper Elementary, Middle or Junior High, and High School). Missouri does not explain the process for the review of district resource allocation (e.g. who will conduct the review, what information will be required

	from the LEAs, what is included in the ASBR, or the consequences for LEAs in which resource inequities exist).
Did the SEA meet all requirements?	☐Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Missouri must provide details on the use of the ASBR and the process for reviewing district resource allocation that is consistently implemented across all LEAs and schools identified for comprehensive support and improvement or targeted support and improvement.

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?

	Peer Response
Peer Analysis	Missouri provides a thorough and detailed description of the technical assistance it will provide to schools identified for comprehensive or targeted support and improvement (pgs. 31-34). Missouri has an established system of support, the Missouri Statewide System of Support (SSOS) that includes evidence-based interventions addressing the areas of student achievement, graduation rates, closing achievement gaps, increasing English proficiency for EL students, and improving academic achievement of students with disabilities. The SSOS includes site visits, development of a timeline for improvement and differentiated support for LEAs depending on their specific needs. Missouri provides dedicated support to those schools identified as needing comprehensive support. Schools identified for targeted support have access to the same resources but dedicated support is more limited. Missouri provides a plan of technical support for LEA leadership teams during the first year only. The plan would be strengthened with attention to building the identified school's instructional staff's capacity to continually and collaboratively make informed and effective changes to their instruction. The plan suggests that the technical assistance is limited to LEAs with larger numbers of schools identified in the lowest 5% of Title I teachers. The state has provided no information about the types and locations of Title I schools who will be identified under the ESSA state accountability system proposed in this plan. This information would provide stakeholders with the data needed to determine if a significant number of the identified schools were receiving technical support. The Missouri plan needs to provide a parallel plan for showing how identified Title I schools, not in the larger LEAs, will receive some level of technical

	support.
Strengths	The state provides support to LEAs in developing and implementing accountability plans and evidence-based interventions. Structures focus on school leadership, curriculum, data teams and effective teaching. The Statewide System of Support (SSOS) provides schools with technical assistance. The system includes evidence-based interventions that support student achievement, graduation rates, and closing achievement gaps. The SSOS system is a mature system that includes evidence-based strategies and interventions.
Weaknesses	Only schools identified for targeted support receive access to the resources. The list of technical assistance activities planned for an LEA (pp. 32 – 34) covers only the initial year of state support and is limited to infrastructure and building implementation capacity for leadership, rather than providing support for improvement of instruction. The plan incorporates review of student performance data without any attention to ongoing teacher efficacy focused on instructional change which will have a direct impact on changing student learning. The plan suggests the technical assistance will be provided only to those LEAs with high numbers of low performing schools, implying technical assistance is limited to large districts. The limitations of who will receive technical support suggests the state assumes (or knows) the projected 62 Title I schools and 6 high schools identified as low performing are in large metro LEAs. With over 500 LEAs and charter schools in the state, many of the LEAs are in rural settings and need different technical support than those located in urban environments. Achievement gaps in urban learning environments raise different concerns and root causes than achievement gaps found in most rural learning environments, often involving opposite issues.
Did the SEA meet all requirements?	☒ Yes (3 peer reviewer(s)) ☒ No (1 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The Missouri plan must outline a multi-year plan of support focused on building instructional capacity to implement high capacity instructional practices to achieve deep learning aligned to the state's academic standards. The Missouri plan should explicitly state the timeframe for which technical assistance will be provided as well as any measures that will be used to evaluate the effectiveness of the assistance.

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?

	Peer Response
Peer Analysis	Not applicable for the state.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☐ Yes (# peer reviewer(s)) ☐ No (# peer reviewer(s)) ☒ Not Applicable (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

➢ Does the SEA describe the extent, if any, that low-income children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers?

➢ Does the SEA describe the extent, if any, that minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers?

➢ Does the SEA describe the measures (*e.g.*, data used to calculate the disproportionate rates) that it will use to evaluate and publicly report its progress with respect to how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers?[4]

	Peer Response
Peer Analysis	Missouri defines inexperienced, out of field and ineffective teachers (p. 35). LEAs submit data to the state. The state then looks at whether there are larger numbers of inexperienced, out of field or ineffective teachers in schools designated for comprehensive support as compared to other schools within the LEA. Public data are reported. LEAs must either use the state's education evaluation system or craft their own design that adheres to the state's design principles. Policymakers are aware of the multiple ways in which an ineffective teacher might be identified.

[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.

Strengths	The state provides LEAs with flexibility to define effectiveness; the state sets a 10 percent variance for underperforming schools compared to those in the district. Public report cards show these data. From pages 35 to 36, the Missouri plan presents the state's philosophy and beliefs concerning the impact of ineffective, out-of-field, or inexperienced teachers on the academic preparation of low-income students. The Missouri plan references multiple existing tools or processes within the state that can be used to identify effective educators.
Weaknesses	The plan indirectly describes how the state's teacher evaluation system is used to further identify ineffective teachers within a local school system. On page 36, Missouri describes how MO-DESE bases its analysis on disproportionate rates of educators solely on CSI and additional targeted support Schools. However, this approach fails to include all Title I schools as required in ESEA section 1111(g)(1)(B).
Did the SEA meet all requirements?	☐Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Missouri must clarify whether all Title I schools are included in its analysis.

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

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

	Peer Response
Peer Analysis	Missouri is developing an online content delivery system as reported on page 37 to distribute professional development pertaining to positive social and behavioral practices. Online professional development will be available to all state educators. No timeline was provided for when the Virtual Learning Platform will be available to Missouri LEAs and there was only a mention of what's being done in the meantime (the Multi-Tiered System of Support). It appears that Missouri is implementing and working with LEAs to implement

	Positive Behavior Intervention Support. The plan has described the state's initial step in creating safe and healthy learning environments, increasing staff awareness of potential issues and solutions to those problems through online learning. The proposed structure of the delivery system for the professional development will allow the state to reach out quickly to all teachers in the state. The state needs to describe a comprehensive method of working with all schools to identify their needs related to reducing bullying/harassment, reducing negative discipline practices, and implementing positive behavioral interventions.
Strengths	The plan contains an online platform that can customize necessary resources. The online professional development is integrated within a larger data platform. This platform is easy to access. The plan suggests the state is in the process of completing an online professional development portal to increase educator awareness of practices which can be implemented to create safe and healthy learning communities.
Weaknesses	It is not evident from the Consolidated Plan how Missouri is currently supporting LEAs to improve conditions for student learning, only that an online platform that will tie data collection systems is being developed. It was unclear as to whether or not the online platform will address the serious school conditions of this requirement as it is a passive strategy to convey important information. The online portal is not yet complete. The plan does not describe how Missouri will more directly support LEAs in their efforts to create safe and healthy learning environments.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Missouri must provide more specific information and timeline on how the online system addresses the areas of bullying, harassment, overuse of discipline practices that remove students from the classroom, and the use of aversive behavior interventions that comprise student health and safety.

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?

	Peer Response
Peer Analysis	Missouri's solution to supporting school transition lies in training staff using its soon-to-be-developed online professional development system. Also, the plan states on page 37, Missouri Postsecondary Success Project (MPSS) is available for educators to use.

	The plan for providing effective transitions for students was nearly non-existent in the Consolidated Plan. Missouri states on page 37 that the online content delivery system will include material on transitions but no specific details were provided. It is assumed the online content delivery system is the same system that will be used for supporting LEAs to improve school conditions as described in the previous section (A.6 School Conditions) but this connection was not explicit. The plan also mentions the Missouri Postsecondary Success Project (MPSS) that educators may use to embed college-and-career competencies into course; however, it seems the training is provided upon request and not required for LEAs.
Strengths	There are some college and career ready frameworks that are available to LEAs and schools, and free to LEAs upon request.
Weaknesses	Though the focus on the competencies is well-meaning, the state plan sets forth a passive strategy so that there is no guaranteed that the very students that would most stand to benefit receive these resources. The plan does not spell out with details any plans for supporting transition to middle or high schools other than the development of an online learning system for staff. However, there are no details about what will be included in the online system in regard to transition plans. Training is provided upon request, which means that the support is not equally provided to all LEAs nor to the districts that may most need the help.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Missouri must provide detailed information about how it supports LEAs with transitions for middle and high school students (e.g. curriculum, instructional and student supports, teacher training, data work, dual credit opportunities).

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?

	Peer Response
Peer Analysis	The Missouri plan outlined an EL student intake process that satisfies all the requirements of this section. The state collaborated with seventy-five EL educators from across the state to develop and document an intake process, completed within 30 days of enrollment, for all students with home backgrounds involving a language other than English. The collaboration between the SEA, local LEAs, and WIDA established meaningful entrance and exit scores aligned to the states English language acquisition academic standards which are specific to the state, rather than based on a set of national norms. Practitioners and postsecondary institutions were included in the discussion about entrance and exit procedures. The discussions were part of the ESSA discussions and included two regional English language learner work groups involving seventy-five stakeholders.
Strengths	The ESOL entry and exit criteria discussions included English learner experts and field staff. The state provides the Language Use Survey (LUS) to all LEAs for use in initial screening of students and families with non-English home backgrounds. The local entities within the state have guidelines for applying the instrument consistently as well as an internal infrastructure designed to test all non-English students within 30 days of school enrollment. The state has supported collaboration with WIDA to ensure LEAs have the necessary tools/guidance to consistently and effectively place students at the appropriate level of English language acquisition instruction early in their learning experience within the LEA. Missouri includes box-plot to show relationships between MAP and WIDA proficiency.
Weaknesses	There was no mention of the timeline for assessing students who start after the first of the school year. It is assumed that these students would be accessed within 30 days of enrollment. Missouri developed an AEP score for English learners' exit from services specific to the state and correlated with success on state ELA and mathematics accountability assessments. Missing from the discussion was the relationship between national Access norms and performance on the state accountability assessment. The text of the plan provides information on how the AEP score was determined, but it is not clear when looking at data tables. The state could clarify the data table by labeling a column of data with AEP. Specifically, Missouri needs to clarify its description of its exit-entry criteria table (page 74) and increase the progress expectations shown in Table C on page 71 to ensure English Learners become proficient in the English language sooner
Did the SEA meet all requirements?	☒Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))

If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	The Missouri plan did not respond to the requirements of this section. The state needs to outline a clear process for assisting LEAs in the implementation of quality English language acquisition programs to grow the impact of instruction over the 10 years of this plan. The plan needs to move beyond sustaining the same level of student success each year to gradually increasing raising the percentage of students exiting the program each year.
Strengths	Missouri based its determination on a report from the WIDA Consortium6, a consortium that has successfully collaborated with MO in the past on this topic.
Weaknesses	The Missouri plan does not address how the state will assist LEAs in meeting long-term goals based on English language acquisition content standards. The state provides information on how it will monitor and evaluate LEA instruction related to EL programming, but did not provide details on how they will support the ongoing technical assistance needed to sustain the consistent implementation of entrance/exit processes as well as grow the effectiveness of each local program's instruction.

Missouri did not describe how they will assist eligible entities in helping to ensure that English learners meet challenging state academic standards. The Consolidated Plan merely described how the long-term goals and measurements of interim progress were determined—it did not provide an explanation of how it (MO-DESE) will assist the eligible entities. |
| *Did the SEA meet all requirements?* | ☐Yes (0 peer reviewer(s))
☒ No (4 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this* | Missouri must clearly describe how the state will assist eligible entities to ensure that English learners meet long terms goals and challenging state academic standards. |

requirement	

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?

	Peer Response
Peer Analysis	Missouri has detailed its monitoring system for eligible entities that receive Title III, Part A subgrant funds. The tiered monitoring system includes desk monitoring, desk review, and on-site monitoring. Eligible entries not meeting compliance are required to write and implement corrective action plans that promote students' advancement to English language proficiency. Missouri has completed various studies of EL performance to identify various patterns of performance that indicate technical assistance is needed to turn around the EL program at the local level. The state not only recognizes those patterns, but also has EL instructional experts who can provide personized technical assistance to help the local LEA turn the program around. Missouri provides technical assistance through a variety of sources, including the state director of English Language Programs, the director of English Language Curriculum, regional English language instructional specialists, and instructional coaches for migrant English language learners, Train the Trainer opportunities, virtual workshops, and statewide regional professional development workshops.
Strengths	LEAs may receive personalized technical assistance. The Missouri plan outlined a three-stage cycle for monitoring each LEA receiving English learner funding: desk monitoring, desk review, or on-site monitoring. Details for each phase of the cycle are included in the plan (p. 52 – 53). MO-DESE EL specialists provide personalized technical assistance for each LEA as needed to improve EL instruction; the technical assistance is offered as soon as the on-going monitoring process shows any sign of concern for declining student performance. The state has also placed an EL specialist on each Regional School Improvement Team (RSIT) to ensure the lowest performing schools have access to quality EL instructional experts.
Weaknesses	Missouri did not describe the specific steps it will take to assist eligible entities that are not effective.
Did the SEA meet all requirements?	☒Yes (4 peer reviewer(s)) ☐ No (0 peer reviewer(s))
If no, describe the specific information or	

clarification that an SEA must provide to fully meet this requirement	