

STATE PLAN PEER REVIEW CRITERIA Peer Review Notes Template

STATE: Mississippi



U.S. Department of Education

Background

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

Role of the Peer Reviewers

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

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

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

How to Use This Document

The peer review criteria are intended to: 1) support States as they develop their consolidated State plans, and 2) inform peer reviewer panels as they evaluate each consolidated State plan. This document outlines the required elements that an SEA must address in its State plan in order to fully meet the applicable statutory and regulatory requirements. If an SEA has provided insufficient information for peer reviewers to determine whether any requirement is fully addressed, peer reviewers should indicate that the SEA has not fully addressed that requirement and identify what additional information or clarification may be needed. Note that responses to some elements are required only if the specific circumstances addressed in the question are applicable to the SEA submitting the consolidated State plan (*e.g.*, if the SEA establishes an extended-year adjusted cohort graduation rate in addition to a four-year adjusted cohort graduation rate

in item A.4.iii.b.2 below). For these particular questions, if the circumstances addressed in the question do not apply to the SEA, the SEA is not required to answer the question in order to fully address the statutory and regulatory requirements.

Instructions

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

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

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

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

A.1: Challenging State Academic Standards and Assessments

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA provides courses to all schools in the State to provide 8th grade students with the opportunity to take the Algebra I course and assessment prior to high school. However, the SEA does not describe any other strategies to ensure students are adequately prepared other than teacher professional development across the State. It is not clear that the professional development, which is only generally described, will adequately prepare teachers to deliver advanced math courses prior to high school.</p> <p>The SEA does provide opportunities for students to take the Algebra end-of-course assessment (EOC) that will be used for state assessment and accountability purposes.</p>
<i>Strengths</i>	<p>Access to the Algebra I course and assessment are available at all schools.</p> <p>Students are provided the opportunity to take Algebra 1 in 8th grade.</p> <p>MS has a statewide Algebra I test already in use and is rolling out an Algebra II assessment as well.</p> <p>According to the state plan, the SEA has invested in professional development to strengthen classroom instruction aligned to the Mississippi College and Career Readiness Standards.</p>

¹ In order for an SEA to exempt an 8th grade student from the mathematics assessment typically administered in 8th grade under ESEA section 1111(b)(2)(B)(v)(I)(aa), it must ensure that: a. the student instead takes the end-of-course mathematics assessment

<i>Weaknesses</i>	<p>While access to course work for all students is provided and teacher professional development is available, it is not clear how these broad strategies will specifically ensure the success of all students.</p> <p>Evidence could not be found regarding any support provided to students prior to 8th grade to ensure success in advanced math coursework.</p> <p>The plan states that teachers will receive professional development but no measures of the effectiveness of that professional development were provided that indicate changes in teacher behavior, beliefs, skillsets and attitude.</p> <p>The plan would be stronger if more detail was provided regarding the instructional strategies that teachers learned how to use, and whether those instructional strategies will ensure that students are successful in advanced math courses.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

A.3.i: Definition

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA does not provide a definition of “languages other than English that are present to a significant extent” and notes that State Code 3-3-31 (2013) states that English is the official language of the State with English as the only language of instruction. The SEA states that fewer than 3% of the State’s students identify as English learners, with Spanish as the most common second language represented, but does not provide any additional information</p>

	<p>as to the other languages represented.</p> <p>It is unclear how the state determined that 3% of its student population identify as English Language Learners since it is stated later in the response that no mechanism or assessment, other than a home language survey, is in place to make that determination.</p> <p>The SEA makes a convincing argument that this issue is not relevant in the state given the very small percent of students – fewer than 3% - who speak a foreign language that they must be assessed in. In addition, state statute requires “English only” as the accepted language for all official state business, including instruction.</p> <p>The SEA explains that fewer than 3% of the state’s public school students are identified as English Learners (ELs) and the state law dictates that “The English language is the official language of the State of Mississippi.”</p>
<i>Strengths</i>	
<i>Weaknesses</i>	The SEA did not provide a definition for “significant extent” and therefore the panel cannot determine whether languages spoken in the state, e.g., Spanish, are prevalent to a significant extent.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The SEA must define “significant extent” as required by statute. Based on that definition, the SEA must identify the specific language(s) that meet that definition. A language spoken by 3% of students may or may not meet a definition of “significant extent” - the SEA needs to make that determination.</p> <p>All items indicated as not able to be determined must be addressed once a definition for languages other than English that are present to a significant extent is established.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Not applicable as the SEA states that having assessments in languages other than English are not in alignment with State Code.</p> <p>The SEA plan does address this issue by saying they do not administer any exams other than in English, and that this is not needed given the very small percent of non-English speakers and its English-only statute.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information</i>	

<i>or clarification that an SEA must provide to fully meet this requirement</i>	
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A.3.iii: Assessments not Available and Needed

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA states that having assessments in languages other than English is not in alignment with State Code. The SEA indicates no non-English assessment is needed but no definition of significant extent was given as noted in indicator A.3.i.
<i>Strengths</i>	
<i>Weaknesses</i>	The SEA did not define “significant extent” defined as required by statute. A 3% threshold may or may not be significant and the SEA needs to make that determination.. Based on that definition the SEA must identify the specific language(s) that meet that definition. All items indicated as not able to be determined must be addressed once a definition of significance is established.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	A definition of significant extent is needed in order to determine if assessments in other languages are needed.

A.3.iv: Efforts to Develop Assessments

- Does the SEA describe how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population, as defined by the SEA and identified under A.3.i of the consolidated State plan template?
- Does the SEA’s description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include the State’s plan and timeline for developing such assessments?
- Does the SEA’s description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include a description of the process the State used to:
 - 1) gather meaningful input on the need for assessments in languages other than English;
 - 2) collect and respond to public comment; and
 - 3) consult with educators, parents and families of English learners, students, as appropriate, and other stakeholders?

- If applicable, does the SEA’s description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include an explanation of the reasons (e.g., legal barriers) the State has not been able to complete the development of such assessments despite making every effort?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Not applicable as the SEA states that having assessments in languages other than English is not in alignment with State Code.</p> <p>The state did not address any of the items indicated in this requirement as it stated early on the section that the state is an ‘English only’ state and no assessment processes to determine need have been developed.</p> <p>As noted above, MS does not believe there are any foreign languages (spoken by non-English speakers) that are present to a significant extent.</p> <p>There are no languages other than English present to a significant extent, therefore assessments are not being developed in other languages.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	The state did not determine whether there is a need for assessments in other languages. They cited state law which precludes developing such assessments.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The SEA did not provide a definition of “significant extent” threshold is not defined as required by statute. A 3% threshold may or may not be significant and the SEA needs to make that determination. The state needs to provide a definition of that threshold and describe how that threshold was determined. Based on that definition the SEA must identify the specific language(s) that meet that definition.</p> <p>The other items listed above cannot be addressed until the definition of significant extent is stated.</p>

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA identified nine subgroups they include in the state accountability system and whose performance will be used to identify Targeted Support and Intervention (TSI) schools in the future. In addition to the usual subgroups they also include a “Two or More Races” identifier. Asian was not initially identified in this section but is found in later sections/tables.

<i>Strengths</i>	The SEA added an additional subgroup, 'Two or More Races'.
<i>Weaknesses</i>	The Asian subgroup was not initially indicated.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The Asian subgroup needs to be included in this section regarding subgroups.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA has identified the lowest performing 25% of students based on statewide assessments as an additional subgroup because the SEA believes that highlighting this group forces districts to identify students in need of intervention that would otherwise not be traditionally identified and served.
<i>Strengths</i>	The SEA states that since including the lowest 25% indicator, the State has shown significant gains on the NAEP results. The SEA plan highlights low-performing students regardless of their subgroup characteristics due to their low N-counts in the subgroup data. The Mississippi school system is predominantly a rural school system with many small schools.
<i>Weaknesses</i>	It is not clear in the plan whether the lowest 25% subgroup is held to the same accountability criteria as all other subgroups.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

Note: This peer review criterion applies only if a State selects the third option in item A.4.i.d in the consolidated State plan template for recently arrived English learners under which the State applies the

exception under ESEA section 1111(b)(3)(A)(i) or the exception under ESEA section 1111(b)(3)(A)(ii) to a recently arrived English learner.

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA has identified the minimum number of 10 students, in both the all students group and in each subgroup needed for the purposes of accountability.
<i>Strengths</i>	The state has identified an accountability process to allow for more targeted support for students who may be in a subgroup whose 'n' does not meet the threshold for accountability.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information</i>	

<i>or clarification that an SEA must provide to fully meet this requirement</i>	
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A.4.ii.b: Statistical Soundness of Minimum N-Size (ESEA section 1111(c)(3)(A)(i))

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA’s minimum n-size of 10 may compromise privacy, particularly considering the number of small schools across the State. While it is understandable to select a small n-size in order to ensure that a larger number of schools are held accountable for student learning, there is no data to support the rationale for an n-size of 10 that analyzed proportionality of schools that would be excluded if n-size was greater than 10.</p> <p>The state acknowledged that a lower n size would be more beneficial in the identification of schools/subgroups but no specific methodology for determining statistical soundness was found.</p> <p>The SEA assessment system uses complete population data in making determinations. The relatively small n-size of 10 increases the number of small schools that will have statistically sound subgroup data without jeopardizing individual privacy.</p> <p>The SEA stated that Mississippi does not use statistical sampling in accountability data; rather, the SEA uses the full population.</p>
<i>Strengths</i>	The SEA is looking to optimize the identification and tracking of subgroup performance
<i>Weaknesses</i>	The state established an n-size of 10 but did not describe any analyses that were performed to examine the tradeoffs between privacy and exclusion of subgroups that were below the cutoff. In addition, they did not address whether an n-size of 10 provides sufficient reliability for a subgroup of that size.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)

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

<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	A specific statistical methodology by which the n of 10 was determined is needed. The SEA must examine whether a larger n-size, which could provide additional privacy protection, would result in many more subgroups being excluded from disaggregation.
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A.4.ii.c: How the SEA Determined Minimum N-Size (ESEA section 1111(c)(3)(A)(ii))

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA describes the stakeholder engagement process and the composition of a task force used to provide feedback on the accountability system; however, the plan does not explicitly describe the statistical methodology employed to determine the minimum n size.
<i>Strengths</i>	The Task Force held open hearings throughout its 18-month existence and encouraged public participation in its meetings. After the Task Force work was conducted, implementation was assigned to a technical advisory committee, which also held a series of open and well-attended meetings.
<i>Weaknesses</i>	<p>It appears that the SEA’s stakeholder input is outdated. An overhaul of the old accountability system, which resulted in a new n-size of 10, was conducted before the ESSA legislation came in to existence. There is no evidence that any additional considerations around the n-size of 10 occurred after ESSA passage in December 2015.</p> <p>It was not clearly evident the amount of input the stakeholders had in determining the ‘n’ of 10.</p> <p>The SEA offers no explanation of how the stakeholder groups determined that the n-size is statistically sound or the type of input provided by each stakeholder group.</p> <p>There is no description of required stakeholder consultation with parents as required by the criteria.</p> <p>While an extensive public process was conducted it was not explicitly stated whether the Task Force made the decision to reduce the n to 10. In addition, the plan did not indicate whether there was parent input.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The plan must include how the stakeholder input contributed to the determination of n-size and must describe the statistical methodology. In addition, the plan must describe the extent to which parents were involved in decision-making.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA notes that scores will be suppressed for n-sizes below 10, but does not make an explicit case for how the privacy of individual students with an n-size of 10 will be protected.</p> <p>No specific explanation of how an n of 10 ensures the privacy of students was given.</p> <p>Subgroup scores based on fewer than 10 students, or which represent fewer than 5% or greater than 95% of students, are not disaggregated. This is true both at the school and the district level.</p> <p>The SEA states that it will suppress when the number of students reporting scores is below 10. The SEA will also suppress in the case of any percentage value below 5% or higher than 95% for subgroup data including graduation rate and participation rate at the school or district level at less than 5%.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	There seems a lack of explicit explanation or examples on how the SEA will ensure that the minimum number of students will protect the privacy of individual students.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.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?

³ See footnote 5 above for further guidance.

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA's minimum number of students for purpose of reporting is not lower than the minimum number of students for the purpose of accountability.
<i>Strengths</i>	The numbers for reporting and accountability are the same.
<i>Weaknesses</i>	No analysis of statistical reliability or information regarding privacy issues was provided.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA identifies the long-term goal for all students in all sub-groups as 70% proficiency during the course of a 10-year timeline, including baseline data for all subgroups in reading/language arts and mathematics assessments. The long-term goals more than double the proficiency rates for all students and six of ten subgroups over the time period. No indication of how students with the most significant cognitive disabilities would be included was found. The plan appears to be more ambitious for some subgroups than others.
<i>Strengths</i>	The proficiency goals over the next decade are certainly ambitious for lower performing subgroups.
<i>Weaknesses</i>	It is a strength that the goals are ambitious for the lowest performing subgroups; however for the higher performing subgroups they are not (e.g. 70% proficiency target for Asian students is not ambitious given the 57% proficiency baseline).

<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Proficiency levels need to be commensurate and aligned with baseline data at a higher rate to be ambitious for the higher performing subgroups.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA provides measurements of interim progress towards meeting the long-term goals for all students and for each subgroup of students. In Appendix A, the SEA provides measurements of interim goals for all students and subgroups on overall baseline data (2015-16), interim measures (2018-19 and 2021-22), and long-term goals (2024-25).
<i>Strengths</i>	The SEA assessment program has been in place for several years now and will remain in place. That gives the SEA extensive baseline and longitudinal data to work from in understanding the status of its student population and sub-populations.
<i>Weaknesses</i>	Even though the plan meets the criteria, the quality of the interim goals are not ambitious for some of the higher performing subgroups.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Revise the long term goals so they are ambitious for all subgroups as referenced in A.4.iii.a.1 and then revise interim measures of progress accordingly.

A.4.iii.a.3: Improvement necessary to close statewide proficiency gaps

- Do the long-term goals and measurements of interim progress for academic achievement take into account the improvement necessary for subgroups of students who are behind in reaching those goals to make significant progress in closing statewide proficiency gaps, such that the State’s long-term goals require greater rates of improvement for subgroups of students that are lower achieving?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA’s long-term goals and measurements of interim progress for academic achievement take into account the improvement necessary for subgroups of students who are behind in reaching those goals to make significant progress in closing statewide proficiency gaps, such that the State’s long-term goals require greater rates of improvement for subgroups that are

	lower achieving based on the baseline data.
<i>Strengths</i>	The measures of interim progress specifically consider faster rates of growth for groups of students that currently have lower baselines to make significant progress in closing statewide gaps in the proficiency outcomes.
<i>Weaknesses</i>	The SEA selected the ‘all students’ group to address the assessment of the achievement gap for the black subgroup rather than taking the highest subgroup (white) as the countermeasure. It seems illogical to use a subgroup that is part of the ‘all’ group to measure progress against itself. The SEA is lowering the bar for the Black subgroup by selecting a lower performing group with which to compare it. Growth goals for higher achieving sub-groups are smaller and may have the unintended consequences of communicating to stakeholders that the SEA has set lower growth expectations for certain subgroups of students.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA identifies and describes long term goals for the four-year adjusted cohort graduation rate for all students and for each subgroup of students. The SEA’s description includes baseline data starting in 2015-2016 and a timeline for students to meet the goals. According to the plan, the state’s ESSA Advisory Committee used a similar 10-year time horizon and linear growth trajectory which aids the targets in being ambitious.
<i>Strengths</i>	The graduation targets for some subgroups are ambitious (i.e. students with disabilities and English language learners). The long term goal is above the current national graduation average. While the target long-term graduation rates differ for the various subgroups (even though the proficiency targets do not), in all cases the long-term target

	exceeds 67%, which is the threshold for putting a high school into Comprehensive Support and Intervention (CSI) status.
<i>Weaknesses</i>	Given that some high needs schools graduate 98% of their students and given the State's upward graduation trend, it is not clear how a 90% graduation rate is sufficiently ambitious.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA provides measurements of interim progress and differentiated graduation rates for all students and for each subgroup of students.
<i>Strengths</i>	
<i>Weaknesses</i>	Only a data table with graduation rate in baseline data, interim measures, and long-term goals was provided. No rationale or explanation for how these interim measures were established was provided.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA plan establishes measures of interim progress towards meeting the long-term graduation goals for all students and for each identified subgroup of students. The SEA uses three-year interim benchmarks to 2024-2025. The SEA appears to use a gap closing methodology, expecting larger gains in graduation rate for subgroups with a lower graduation rate baseline in the 2015-2016 school year. It was highlighted within this plan that the largest graduation rate gap between special education students and all students will be reduced to 20% as opposed to the current gap of 47.6%.
<i>Strengths</i>	The plan focuses specifically and ambitiously on the special education subgroup, which has the lowest rate (34.7%) of any subgroup. The long-range goal (p. 16) is to nearly double the rate, to 70%, which will reduce the gap to 20% (from the current 47% gap).
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)

<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	
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A.4.iii.c: English Language Proficiency (ESEA section 1111(c)(4)(A)(ii))

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>It was not clear what Table C on page 111 represents. It is unclear what constitutes the baseline number indicated on page 111.</p> <p>A differentiated timeline for reaching English proficiency was provided on page 17.</p>
<i>Strengths</i>	<p>The SEA acknowledges the non-linear progress of ELs, particularly as it relates to ELP levels.</p> <p>SEA has been using the LAS Links measure of English proficiency for three years, and will be revisiting the ELP standards this school year.</p>
<i>Weaknesses</i>	<p>The information related to this indicator and the tables provided on pages 17 and 111 were not clear as to what information is portrayed.</p> <p>The interim goals in this section suggest that this measure is annual movement toward proficiency but the table on page 111 seems to indicate that 70% of EL students will be proficient in 2024-25. More clarity is needed to ascertain what is being measured – growth or proficiency.</p> <p>The table on page 111 appears to indicate the percentage of increase overall for EL students. The plan, and the table, would be clearer if it provided disaggregated progress data for students at different initial proficiency levels. This would provide information critical to targeting supports appropriately.</p> <p>The SEA did not provide any specific data regarding the identification and description of the long-term goal for increasing the percentage of English learners making progress in achieving English language proficiency, as measured by the statewide English language proficiency assessment.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the</i>	The information contained in this section is confusing. It is unclear whether

<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	the table on page 111 portrays the percentage of students attaining EL proficiency. This information needs to be broken down to address the percentage of students meeting growth to English proficiency benchmarks at each measurement year. Baseline data needs to be provided.
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A.4.iii.c.2: Measurements of interim progress

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA only provides measurements of interim progress toward the long-term goal for increases in the percentage of all ELs making progress in achieving English language proficiency. However, disaggregation by initial English language proficiency levels was not found.
<i>Strengths</i>	The plan recognizes that English acquisition is much quicker the less a student knows, but that progress to true English-language proficiency may take longer as the student gets closer.
<i>Weaknesses</i>	The plan would be much stronger if data were disaggregated by initial ELP level at the interim measures. Clarity on Table C on page 111 indicating what is portrayed would also strengthen the plan (e.g., clearly indicate whether the 48.3 % refers to the proportion of students currently meeting the benchmark. If this information were disaggregated by initial EL proficiency level that would strengthen the plan.)
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The information contained in this section is confusing. It is inferred that the table on page 111 portrays the percentage of students attaining EL proficiency. More clarity of the purpose of this chart is needed. This information needs to be broken down to address the percentage of students meeting growth to English proficiency benchmarks at each measurement year.

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

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

A.4.iv.a: Academic Achievement

- Does the SEA describe the Academic Achievement indicator used in its statewide accountability system, including that the SEA uses the same indicator for all schools in all LEAs across the State?
- Does the description include how the SEA calculates the indicator, including: 1) that the calculation is consistent for all schools, in all LEAs, across the State; 2) a description of the weighting of reading/language arts achievement relative to mathematics achievement; 3) if the State uses one, a description of the performance index; 4) if, at the high school level, the indicator includes a measure of student growth, a description of the growth measure (e.g., a growth model); and 5) if the State

averages data, a description of how it averages data across years and/or grades (e.g., does the State use a uniform averaging procedure across all schools)?

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA claims “the indicators appear to be valid and reliable with highly stable and low measurement of error for both all students and subgroups of students” but no specific description as to whether reliability and validity had been statistically established was evident.</p> <p>The SEA describes the academic indicator and calculation process to be used and does indicate that ‘all’ students will participate in the same assessments. However, the plan does not explicitly state whether all schools would be held to same proficiency standards.</p> <p>The indicator can be disaggregated for each group of students. A growth model was addressed in the following section. The plan did not describe how the requirement that 95% of students, at a minimum, would be included in the Academic Achievement indicators.</p> <p>The SEA describes that the Academic Indicator is based on proficiency scores as measured by the Mississippi Academic Assessment Program (MAAP) for grades 3-8 in reading/language arts and mathematics and by secondary End of Course assessments in English II, Algebra I, and in the future, Algebra II. The SEA’s academic achievement proficiency is defined as achievement level four or five on the five-level reading/language arts and math assessments.</p>
<i>Strengths</i>	<p>The state’s assessment results, which have been used for several years now, appear to be stable and aligned with state standards. MS reports that “the scores are highly stable with low measurement errors for both the overall population and for identified subgroups of students (p18).”</p>
<i>Weaknesses</i>	<p>The plan does not explicitly state that at least 95% of all students will be assessed in the same manner for accountability purposes.</p> <p>A clear statement that all schools are held to the same proficiency standards is not provided.</p> <p>The growth model is included in the following section but is not included in this section.</p> <p>Clarity is needed around the banking of student scores and when student Algebra I/English II scores will be applied in the accountability process.</p> <p>A more detailed description of the reliability and validity processes used would help the plan to be stronger.</p>

<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The plan must explicitly state that 95% of all students, at a minimum, will be assessed for accountability purposes.</p> <p>A clear statement that all schools are held to the same proficiency standards is needed.</p> <p>The growth model is included in the following section but also needs to be included in this section if it is used for high school Academic Achievement accountability.</p> <p>Clarity is needed around the banking of student scores and when student Algebra I/English II scores will be applied in the accountability process.</p>

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

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

- Does the SEA describe the Other Academic indicator used in its statewide accountability system for public elementary and secondary schools that are not high schools, including that the SEA uses the same indicator and calculates it in the same way for all elementary and secondary schools that are not high schools, in all LEAs, across the State, except that the indicator may vary by each grade span?
- Does the SEA describe, if applicable, how it averages data across years and/or grades (e.g., does the State use a uniform averaging procedure across all schools)?
- If the SEA uses a different indicator for each grade span, does it describe each indicator, including the grade span to which it applies?
- If the Other Academic indicator is not a measure of student growth, is the indicator another valid and reliable statewide academic indicator?
- If the Other Academic indicator is not a measure of student growth, does the indicator allow for meaningful differentiation in school performance?
- Can the indicator be disaggregated for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The State indicates that two additional indicators are used: 1) Science and Social Studies proficiency and 2) Math and ELA growth; however, this indicates four separate indicators.</p> <p>Data is not averaged. All Other Academic indicators are administered to all students and disaggregated by all students and all subgroups. Many of the indicators are high school (e.g. US History) and don't belong in this section. Student growth processes are clearly explained and it is indicated that data is disaggregated across subgroups.</p>
<i>Strengths</i>	<p>The SEA conveys clear expectations and incentivizes growth for all students while also acknowledging differentiation in Math and ELA growth across levels of proficiency (e.g., increase within the lowest three performance levels that crosses over the mid-point of the level; additional weights for increase of</p>

	<p>two or more proficiency levels).</p> <p>Science proficiency – measured in both grades 5 and 8 – seems to apply to all students and therefore represents a true other academic indicator. The plan also briefly describes how academic indicators will be developed for schools that do not participate in required state assessments, e.g., K-3 schools.</p>
<i>Weaknesses</i>	<p>Science – Clarity is needed around whether the Biology I scores are used twice in the accountability plan – once when it is taken and again when the student is in the 10th grade.</p> <p>It is unclear whether the Biology I assessment’s validity and reliability has been established.</p> <p>Social Studies - US History, described as a high school indicator in the plan, should not be included in this indicator as this indicator applies only to schools other than high schools.</p> <p>The description of the Math growth measure seems somewhat inconsistent with the 8th grade exception rule. This section of the plan (page 21) states that students are required to take the grade-level assessment (8th grade) to generate growth scores. Earlier in the plan (page 6-7) the SEA checked “yes” that 8th grade students taking Algebra 1 would take the EOC exam instead of the regular 8th grade math assessment. Clarification is needed.</p> <p>Throughout this section references are made to high school assessments but this section is intended for schools other than high schools.</p> <p>Measures of determining reliability and validity for ELA and Math were evident in a previous section. A detailed description of the validity and reliability processes of the Science assessment is not included.</p>
<i>Did the SEA meet all requirements?</i>	<p>Science Proficiency</p> <p><input checked="" type="checkbox"/> Yes (1 peer reviewer)</p> <p><input checked="" type="checkbox"/> No (3 peer reviewers)</p> <p>Social Studies Proficiency</p> <p><input type="checkbox"/> Yes (0 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (4 peer reviewers)</p> <p>Math Growth</p> <p><input checked="" type="checkbox"/> Yes (4 peer reviewers)</p> <p><input type="checkbox"/> No (0 peer reviewers)</p> <p>ELA Growth</p> <p><input checked="" type="checkbox"/> Yes (4 peer reviewers)</p> <p><input type="checkbox"/> No (0 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>Science – Clarity is needed around whether the Biology I scores are used twice in the accountability plan – once when it is taken and again when the student is in the 10th grade.</p> <p>Social Studies - US History should not be included in this indicator as this references only schools other than high schools.</p>

	<p>The description of the Math growth measure seems somewhat inconsistent with the exception rule as this section of the plan states that students are required to take the grade level assessment (8th grade) where earlier in the plan it was indicated that they didn't. Clarification is needed.</p> <p>Measures of determining reliability and validity for ELA and Math were evident in a previous section. A detailed description of the validity and reliability processes of the Science assessment is not included.</p>
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A.4.iv.c: Graduation Rate

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	<p>It was indicated that graduation rate was weighted but no description about how this weighting impacted the identification of schools in need of support was found and it was only inferred that this would be applied to all high schools. No description of validity for this weighting was found. It appears this indicator is in line with the state's long-term goals as provided in Appendix A</p> <p>The SEA only uses the federal, four-year adjusted cohort graduation rate and all targets reflect that. The definition of graduate is based on the federal definition, and only students meeting this criterion are counted as graduates. The SEA has looked closely at graduation rates and trends for all major subgroups in establishing graduation rate targets. The SEA also describes how alternate diplomas (pending legislative revisions) will be awarded to students with the most significant cognitive disabilities.</p>
<i>Strengths</i>	<p>High school graduation rates are substantially weighted at 200 points which constitutes 20% of points in the accountability system.</p>

	One reviewer indicated that the alternate graduation process with severe cognitive disabilities was well described.
<i>Weaknesses</i>	<p>There was a difference among the reviewers as to whether there is lack of information on how students with significant cognitive disabilities would be defined as graduates for the purpose of accountability calculation.</p> <p>Some reviewers indicated the actual calculation process for graduation rate was not evident.</p> <p>There is no explanation provided regarding how these graduation rates are weighted (except for the assignment of 200 points) and combined, whether they are lagged, and whether they are averaged over time, including subgroups, which impacts the ability to determine reliability and validity.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>More specific information related to the alternative graduation process for severely cognitively impaired students is needed (i.e. comparable to regular graduation rates, aligned with standards as indicated in ESSA High School Graduation Rate Non-Regulatory Guidance (January 2017) document.)</p> <p>The SEA must provide a specific description of how the graduation rate for all students and all subgroups is calculated and factored into determining how the 200 points are allocated.</p> <p>A description of the process for determining reliability and validity is needed.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA describes the State’s definition of English language proficiency, and describes the progress in achieving the English language proficiency indicator as it is used in the statewide accountability system consistently across all LEAs. The SEA describes the challenges of duly communicating with the public regarding the progress of ELs given that the small proportion of students are unevenly distributed across the state and often do not meet the minimum n-size of 10. The SEA inconsistently reports the percentage of English learners across the plan, indicating less than 2% in this section, while reporting less than 3% in Section 3. The SEA also indicates challenges in</p>

	<p>reliability given its low n-size of English learners.</p> <p>A clear description of determining proficiency was indicated. The use of EL data in accountability measures was indicated. It could not be determined if only schools with 10 or more EL students were assessed or if all EL students were assessed in order to give a more accurate statewide picture of EL progress. It is unclear, since LAS Links is valid and reliable in determining EL proficiency, why the issue of validity/reliability was raised in the plan.</p> <p>The SEA uses the LAS Links to measure ELP but it is not clear from the plan (pp. 22-23) whether ELP measures will be part of the accountability system starting in 2018. Note that MS also has few ELPs; they constitute fewer than 2% of all students.</p> <p>The SEA defines English Language Proficiency as Overall 4-5, Reading 4-5, and Writing 4-5 on LAS Links assessment. According to the submitted plan, there is no indication that the Progress in Achieving English Proficiency indicator is used in its statewide accountability system; rather, MDE will assign a 100-point indicator in the state’s accountability model later when valid and reliable measures of EL proficiency and growth are established. There is no timeline for such implementation provided.</p>
<p><i>Strengths</i></p>	<p>One reviewer indicated that the SEA articulates business rules for including the progress of ELs and includes a +/- indicator for the accountability component.</p> <p>The SEA has an ELP assessment in place, has identified what it considers to be proficiency levels, and has identified long-term and interim targets for continued growth in ELP.</p>
<p><i>Weaknesses</i></p>	<p>In this section, the SEA states that less than 2% of the students identify as English learners; however, in Section 3, the SEA states that there are less than 3%.</p> <p>As described in the plan, schools will either get a + or a – depending on whether its ELP students met proficiency targets. These indicators will not affect the school’s accountability score at present, though the plan notes the possibility of attaching 100 points to this metric in the future. As noted on p. 23, “Inclusion as a 100-point indicator in the state’s accountability model could later be implemented once valid and reliable measures of EL proficiency and growth are established, and as the EL population is more evenly distributed.” This sentence not only suggests that ELP will not be included in the accountability system but it also calls into question the validity and reliability of the measure, even though they are using a well-known and researched assessment.</p> <p>The SEA claims that the State has a very small EL population statewide (less than 2%) and very few schools meet the minimum n-count of 10. For this reason, the SEA established the rule that they will not include EL proficiency in determining the school grade; however, the annual progress of all ELs must be assessed annually.</p> <p>The plan does not include a process for using current data as required related</p>

	to determining progress; instead only a + or – is used. The assignment of a + or – does not meet the federal requirement of substantially weighting this academic indicator.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA must provide a description of the plan for how the 100 points will be calculated in the accountability plan using the current data and whether the points assigned to EL proficiency constitute substantial weight. All EL students’ progress must be determined annually.

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA proposes using reading/language arts and math growth of the lowest performing (quartile) students as its additional student success indicator for elementary, middle, and high schools across the State. This section of the plan seems problematic, at least for elementary and middle schools, in that the SEA seems to describe an additional subgroup – the lowest-achieving student group – rather than an additional indicator of school quality or student success (SQSS). This re-use of student achievement data does not result in an additional, non-redundant measure of school quality and student success.</p> <p>For schools that have 12th grade, two additional student success indicators are described (College & Career Readiness and Acceleration), which provides meaningful differentiation in school performance. The ACT is used as the College and Career Indicator and the State provides funding for all junior-year high school students to take the ACT through statewide administration. The Acceleration indicator includes passing scores on assessments associated with accelerated courses such as Advanced Placement, International Baccalaureate, and Advanced International Certificate of Education. However, it is unclear if</p>

	<p>all students have access to such courses in every high school.</p> <p>The SEA identifies when each measure applies to different grade spans of students and provides information on each measure and their rationale to include them. However, it is unclear whether these indicators can be disaggregated for each subgroup of students.</p>
<i>Strengths</i>	For the high school level the plan thoroughly describes CCR and Advancement indicators, how they will be calculated, how they apply statewide, and how they are used to weight the school grade. This approach substantially weights the extent to which high school students are prepared for college and careers.
<i>Weaknesses</i>	<p>The SEA does not make provisions for how the CCR and Acceleration indicator will be disaggregated for each subgroup of students and it is unclear if all students have access to courses that are used for the Acceleration Indicator.</p> <p>Lowest-performing students are already identified as a subgroup in the academic achievement section. The strategy here – to assess growth – would be a legitimate other academic measure but does not really appear to be a separate SQSS measure in elementary or middle schools as it reuses data previously used in other subgroups.</p> <p>Instead of proposing a separate measure of SQSS (e.g., student engagement, educator engagement, school climate) the SEA is proposing to use growth in the lowest 25% group. However, that is establishing another subgroup instead of establishing another indicator.</p> <p>There is no information provided regarding whether these indicators result in meaningful differentiation, and whether they are valid, reliable, and comparable and used statewide in all schools. There is no specific information on how points are assigned to performance on these indicators.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The SEA must clarify in its plan whether the lowest-performing 25% group is an additional subgroup or will be an SQSS measure.</p> <p>If the SEA does consider this an SQSS indicator rather than an additional subgroup, it must describe how it meets the requirements for an indicator, including the ability to disaggregate by subgroup (or in this case, subgroups of a subgroup), whether it's valid and reliable, comparable and will meaningfully differentiate.</p>

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

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

- Does the SEA describe its system of meaningfully differentiating, on an annual basis, all public schools in the State? Split – not meaningfully differentiated due to EL issue
- Is the State's system of annual meaningful differentiation based on all indicators in the State's accountability system?

- Does the State’s system of annual meaningful differentiation include the performance of all students and each subgroup of students on each of the indicators in the State’s accountability system?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>If EL was included in the differentiation model it would have been a system of <u>meaningful</u> differentiation.</p> <p>The state describes the A-F letter assignment to schools as its differentiation model; however, the panel is concerned with two issues: 1) ELP is not weighted and 2) it is unclear how subgroup performance affects the point assignment.</p>
<i>Strengths</i>	<p>The SEA provided tables that provide substantial detail on how the various components of the accountability system are used to generate letter grades. This also includes charter schools.</p> <p>The school accountability breakdowns and calculations are very clearly and intuitively presented, though several components are missing (i.e., the weight for ELP and the ways in which subgroup performance affects the school rating.)</p>
<i>Weaknesses</i>	The SEA does not weight the ELP indicator and there is no description of how subgroup performance affects accountability measures.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>ELP must be substantially weighted.</p> <p>The SEA must describe for each accountability measure how subgroup performance is taken into account.</p>

A.4.v.b: Weighting of Indicators

- Does the SEA describe the weighting of each indicator in its system of annual meaningful differentiation, including how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students (e.g., for the Progress in Achieving English Language Proficiency indicator)? Yes but EL is missing NO – EL is missing
- Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators each receive substantial weight individually?
- Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators receive, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA has provided a framework for weighting the various components of its accountability system. However it did not include any weight for the ELP indicator and due to failing to indicate a substantial weight for this indicator this framework is incomplete.</p> <p>In addition, it is unclear, based on earlier comments (A.4.iv.e: School Quality or Student Success Indicator(s)) whether the SQSS indicator for elementary</p>

	and middle schools is valid. Given the panel concern about the appropriateness of this SQSS indicator, the panel cannot determine whether the weighting is appropriate.
<i>Strengths</i>	The framework provides a strong foundation for a differentiated accountability system.
<i>Weaknesses</i>	While the framework provides a strong foundation for a differentiated accountability system it does not include weighting for ELP and there are concerns about the validity of the SQSS indicator This section of the plan needs additional work to address the lack of information about weighting of certain indicators, as noted above. In addition, related to subgroup weighting, the plan is silent on what to do when n-size requirements are or are not met.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The framework must be revised to reflect substantial weighting for the ELP indicator and must provide a rationale for the proposed SQSS measure for middle and elementary schools.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The State clearly describes a methodology for how schools for which an accountability determination cannot be made are identified for comprehensive or targeted support and improvement.
<i>Strengths</i>	Specific examples (K-2, K-3, K-4, and 6-7 schools) have been provided.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA states it will identify the lowest-performing 5% of all schools receiving Title I, Part A funds but does not explicitly describe how the accountability system will be used for that purpose. In addition to the lowest 5%, the SEA has identified schools with graduation rates less than 67% as well as previously identified for targeted support and improvement with 3 consecutive years of low subgroup performance.
<i>Strengths</i>	
<i>Weaknesses</i>	No description is provided of how the accountability system is to be used in identifying the lowest performing schools.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The methodology for determining the lowest 5% using the accountability plan must be clearly described.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA plan says that high schools, beginning in 2018-19, will be identified for CSI if their graduation rate is below 67%.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)

<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	
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A.4.vi.c: Comprehensive Support and Improvement Schools—Additional Targeted Support Not Exiting Such Status

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The plan briefly notes (p. 34) that TSI schools that for three consecutive years have subgroups performing below the bottom 5% of all schools will be identified for CSI.
<i>Strengths</i>	The table provides a concise summary in an easily understood format.
<i>Weaknesses</i>	The plan refers to the lack of progress of all TSI schools, not those specifically identified as Additional TSI schools (beginning in 2021). It is not clear how schools identified as Additional Targeted Support schools progress to a CSI status.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The plan must specifically describe how Additional TSI schools will be re-identified as CSI schools.

A.4.vi.d: Frequency of Identification

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA refers to a graphic on a single page of the plan as a response to this requirement. The SEA will identify these schools every three years.
<i>Strengths</i>	
<i>Weaknesses</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA’s response references a single page graphic which includes a reference to subgroup performance. It was not clear whether all indicators were used nor whether the support described would target the subgroup(s) whose performance caused the designation. Scores are reviewed annually and the designation occurs as a result of three-year trends.</p> <p>The identification of TSI schools, starting in 2018-19, will be based on the school being in the bottom 5% of schools that have not been identified for CSI and having the proficiency for any subgroup, for any of the three previous years, being below the targets for the performance of that particular subgroup.</p> <p>The SEA proposes to identify Targeted Support & Improvement Schools – Consistently Underperforming Subgroups as the bottom 5% of Title I, Part A schools not identified for Comprehensive Support & Improvement (CSI) in which 3-year average growth in school subgroup proficiency is less than the target proficiency growth rate projected for the same statewide subgroup and school subgroup proficiency rate is less than statewide target proficiency rate for the same statewide subgroup in any of the 3 years being calculated. The identification of these schools will start in 2018-19 based on 2015-16, 2016-17, and 2017-18 data. Subsequent annual identification will be based on most recent three-year data trend.</p>
<i>Strengths</i>	The graphic made it clear to understand the scope and differences of the identification and support provided schools.
<i>Weaknesses</i>	<p>It was not clear if all indicators in the accountability plan for all subgroups were used in the school’s designation and the methodology used to rank schools.</p> <p>TSI is limited to only Title I schools and not all schools.</p> <p>TSI eligibility is capped at no more than 5% of the non-CSI Title I schools,</p>

	regardless of how large the subgroup achievement gap may be in other schools.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	A clear methodology for school identification, including Additional Targeted Support, is needed. An identification process for TSI to include all schools and not just Title I schools is needed.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA refers to a graphic on a single page of the plan as a response to this requirement. The SEA only briefly describes that it will identify schools for Additional Targeted Support and Improvement as schools with a 3-year average subgroup performance that is below that of all students in the lowest performing schools. The first year of identification is the 2018-19 school year and identification will take place on an annual basis.</p> <p>It is unclear what schools (<i>i.e.</i> all or only Title I) are eligible for Additional TSI designation.</p>
<i>Strengths</i>	The graphic provided makes it easy to understand the state’s plan for school identification and support at all levels.
<i>Weaknesses</i>	<p>If only Title I schools are eligible for Additional TSI then this indicator has not been met.</p> <p>It is not clear if some or all of all the accountability indicators will be used to identify persistent low subgroup performance.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must</i>	A clear description of both the definition of subgroup proficiency and what schools are eligible to receive Additional TSI is needed. An expanded narrative within the plan or more description in the graphic is needed to fully respond to all requirements.

<i>provide to fully meet this requirement</i>	
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A.4.vi.g: If Applicable, Additional Statewide Categories of Schools

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	SEA includes an additional category of districts and schools that will become part of the State’s “Achievement School District.” Such districts and schools are those that receive an “F” on the school and/or district report card for two consecutive years or for two out of three years.
<i>Strengths</i>	
<i>Weaknesses</i>	It is unclear whether a district can be included in both the Transformation Model and Achievement School District status concurrently.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA states that if a school/district does not meet the 95% minimum participation rate, the school/district will automatically be dropped a letter grade on the accountability system. The SEA proposes to apply this penalty to the overall, all students’ participation rate only. However, subgroup participation rates will be reported in addition to all students’ participation on State and LEA report cards.
<i>Strengths</i>	
<i>Weaknesses</i>	The plan does not discuss additional factors such as the length of time of non-participation or strategies to address substantial differences in subgroup participation rates. No consequences were described for subgroups of students when they do not meet the minimum participation rate of 95%.

<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The plan must address how not meeting 95% participation of all students in each subgroup will be factored into the accountability score.

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The plan establishes exit criteria that apply after three years, each of which is sufficient by itself for an exit. Two of the exit criteria reflect progress – subgroup performance above the 5% of lowest-achieving schools or a graduation rate above 67%. However, the third criterion does not necessarily reflect progress – the school is now above the lowest 5% of all Title I schools. That can occur if performance declines more in other schools and the deck is reshuffled every three years. Therefore there is no guarantee this exit criterion – now being above the 5% cutoff - will ensure continued progress.
<i>Strengths</i>	
<i>Weaknesses</i>	The plan does not align the exit criteria with the state’s long-term goals and the measurement of interim progress.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The criterion that enables a school to exit by being above the 5% of the lowest-performing schools must be revised because it does not, by itself, ensure continued progress.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The plan identifies one exit criterion (p. 34) – “subgroup performance above that of all students in the lowest-performing schools (bottom 5% of Title I schools) based on identification year data.” This requires schools to make progress but it is not clear what that progress is measured on.</p> <p>The state did not explain how the exit criteria align with the State’s long term goals.</p>
<i>Strengths</i>	<p>The exit criterion specifically addresses the reason why the school was identified in the first place – low subgroup performance – and uses improvement on those measures to exit.</p>
<i>Weaknesses</i>	<p>While the exit criterion does rely on improved performance there is no discussion of whether meeting the criterion also ensures that subgroup performance gaps are meaningfully being addressed or attained.</p> <p>While the SEA provided the definition of exit criteria and timeline information, the state does not explain its system of support and improvement and does not address the sustainability issue.</p> <p>The state did not explain how the exit criteria align with the State’s long term goals.</p> <p>The accountability indicators being used to measure progress are not clearly stated in the plan.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (4 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>An expanded narrative within the plan or more description in the graphic is needed to fully meet all requirements to include what accountability indicators are used in progress monitoring and how the exit criteria align with the State’s long term goals.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA simply states that it will take a more prescriptive approach but does not describe what that entails. There is no way to ascertain if a ‘more prescriptive approach to activities’ correlates with more rigorous interventions given the lack of details.
<i>Strengths</i>	
<i>Weaknesses</i>	No details are included in the response to this section in order for it to be evaluated.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	A detailed description, beyond a more prescriptive approach to activities, is needed for any school not meeting the exit criteria after 3 years.

A.4.viii.d: Resource Allocation Review (ESEA section 1111(d)(3)(A)(ii))

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA states that it engages in an annual formal needs assessment interview process with school teams. Feedback is given for improvement.</p> <p>No indication of a revised reallocation of resources, fiscal and otherwise, was evident.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>More detail is needed as to how resources are reallocated statewide based on the formal needs assessment review to ensure the neediest schools receive adequate support.</p> <p>The plan does not describe whether the State periodically reviews allocation of federal and state funds and other resources to increase student achievement statewide within federal and state guidelines.</p> <p>The SEA does not indicate how it would reallocate the 7% school improvement set-aside in order to provide resources to the highest need schools.</p>
<i>Did the SEA meet</i>	<input type="checkbox"/> Yes (0 peer reviewers)

<i>all requirements?</i>	<input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA must provide a detailed description for how the results of the annual reviews will result in a review of resource allocation to ensure support for the highest need schools as well as the statewide process of resource allocation to support the highest need schools statewide.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA refers to a graphic on a single page of the plan as a response to this requirement. The SEA describes differentiated technical assistance provided for CSI Support Level I and 2 schools that reflects professional development and leadership support on a quarterly basis but does not specify evidence-based interventions.</p> <p>The single page graphic provided in the plan has a description of the differentiated technical assistance provided to individual schools but there is no reference to support provided to districts who have a large number or percentage of schools identified for comprehensive or targeted support and improvement. Additionally, state approved, evidence-based interventions were not mentioned.</p> <p>The plan provides a list (pp. 35-36) of general technical assistance that the SEA will carry out with high-need districts and schools.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>State-approved interventions were not identified.</p> <p>The SEA will provide professional development but no mention of evaluating the effectiveness of those activities was indicated.</p> <p>General technical assistance was indicated in the table but it was only a list of activities provided and not a tiered approach based on school needs. The plan appears to provide more of the same technical assistance even when schools move from TSI to CSI. The plan does not include an analysis of effectiveness of the technical assistance to ensure increased student achievement.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must</i>	The response to this section needs to include more details to include the comprehensive and multi-tiered approach to technical assistance based on data analysis related to intervention implementation to increase the likelihood of improving student achievement.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	Additional action is required, under MS state code, for schools or districts that receive an “F” rating for two consecutive years or for two out of three consecutive years. The SEA will determine whether those schools or districts will be included in the Achievement School District. If that occurs, the district will either come under state management or the state will appoint a district overseer.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA indicates that approximately 82% of the State’s student population is in districts with large minority and low-income student populations and higher teacher attrition rates. While the SEA defines ineffective, out-of-field, or inexperienced teachers, it does not specify to what extent low-income and minority students are disproportionately served by such teachers. Although the SEA does not identify measures that will be used to calculate or evaluate disproportionality, it does provide a link to where such data will be publicly available.</p> <p>A general statement about teacher attrition being higher in lower performing districts was made but no data was provided regarding rates of the teacher status (i.e. ineffective, out of field, inexperienced).</p> <p>The plan does not provide specific data on whether poor and minority children are disproportionately served by ineffective, inexperienced or out-of-field educators, but it stipulates that this is an issue that the SEA has taken steps to address. The plan does provide definitions of all relevant terms required in this section, and describes a range of initiatives in place to remedy the disproportionality challenge.</p> <p>The SEA describes its state law “The Mississippi Critical Teacher Shortage Act of 1998” to attract qualified teachers to critical shortage school districts in the state. The SEA explains the strategies to address the disproportionate rates of out-of-field and inexperienced teachers serving low-income and minority students. The SEA provides definitions of terms in its state plan, including the definition of effectiveness. The SEA describes the extent that low-income and minority students are served at disproportionate rates by ineffective, inexperienced and out-of-field teachers. The SEA presents data and background information describing the issue in an objective manner.</p>
<i>Strengths</i>	<p>The MDE details strategies for recruitment and retention.</p> <p>The SEA will support districts in the implementation of Grow-Your-Own strategies to more effectively attract teachers to schools with large low-income and minority student populations. The SEA seeks to ensure that these equitable access strategies are mostly identified by stakeholders. The SEA will include vertical teams from the critical shortage school districts in the work of measuring and refining the strategies. Through active collaboration with the school districts and stakeholders, the SEA strives to have a better understanding of the likely causes of the equity gaps and strategies, including unintended consequences or implementation challenges.</p>
<i>Weaknesses</i>	<p>No data indicating the extent of the inequities of ineffective, out-of-field, inexperienced teacher placement for low income and minority students nor the measures used to obtain and report the data were provided.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (4 peer reviewers)</p>
<i>If no, describe the specific information</i>	<p>The response must clearly articulate the extent to which inexperienced, ineffective and out-of-field teachers are serving low-income and minority</p>

<i>or clarification that an SEA must provide to fully meet this requirement</i>	students and a description of the measures used to obtain and report this data.
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A.6: School Conditions (ESEA Section 1111(g)(1)(C))

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA describes professional development and training opportunities in bullying and harassment, Early Warning Indicators, Positive Behavior Interventions and Supports and other conflict management in response to this requirement with no additional details of how this will support LEAs to reduce incidences of bullying and harassment.</p> <p>There is no explicit description of how the proposed professional development will reduce overuse of discipline practices and address the removal of students from the classroom nor how the effectiveness of the interventions or tools used will be measured.</p> <p>There is a reference to a statewide Student Safety Act but no details around the content of the Act was provided.</p>
<i>Strengths</i>	The plan describes a range of evidence based programs available to schools.
<i>Weaknesses</i>	<p>Evaluation of the effectiveness of the professional development was not provided.</p> <p>No evidence of attention to cultural differences and competencies, especially for high poverty and minority students, was provided.</p> <p>No evidence was found as to how the State will review data on disciplinary actions, bullying and harassment to target support to LEAs.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The state must indicate how the professional development is likely to reduce the targeted school conditions (e.g. disciplinary actions, incidences of bullying, etc.) through progress monitoring as well as program evaluation and a process for examining data to ensure incidences related to school conditions are being reduced.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA affirms the rationale for transition supports and describes the importance of specific actions taken by school counselors and provides good detail as to examples of such activities. It is unclear as to the role of the State in providing clearly structured resources or technical assistance for LEAs to accomplish what is described.</p> <p>No description is provided of the state’s role in how it will support LEAs receiving fiscal support through Title IA in meeting the needs of all students at all levels of schooling. No mention of providing support to decrease the risk of students dropping out was evident. A detailed description of how special needs students transition needs are met was provided.</p> <p>The SEA provides information on roles of school counselors who will be collaborating with all stakeholders to ensure a smooth transition at each level. The SEA describes the development of an Individual Success Plan (ISP) which encompasses activities designed for students to explore their interests and abilities and to connect those interests and abilities to career pathways. This is the SEA’s specific strategy designed for students who are transitioning from the middle school to high school. The SEA did not include strategies in transitioning from elementary school to middle school.</p>
<i>Strengths</i>	Specific transition plan for students with disabilities is described, in alignment with IDEA requirements.
<i>Weaknesses</i>	<p>Only activities conducted by LEAs, and in particular by counselors, are listed.</p> <p>It is unclear how the initiatives/strategies constitute a system of support as opposed to a series of actions or roles of counselors.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The SEA must provide a detailed response to this section that indicates the support it will provide directly to LEAs related to transition activities (e.g. PK-K; K-1 st , MS-HS, HS-Career or college, etc.) and support to reduce dropouts.

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA’s response to this indicator meets the minimum statutory requirements by providing an overview of its process and procedures for identifying English Learners, including assessing Home Language Survey (HLS) within 30 days of a student entering a school in the State. The SEA has established an ‘EL Advisory Panel’ comprised of EL teachers, EL coordinators, directors, and school administrators who represent the geographic diversity of the State. The EL Advisory Panel provided input on entrance and current exit criteria and offered feedback on needed professional development.</p> <p>As mentioned in the state plan, the SEA is planning to establish new English Language Development standards that result in revisiting the entrance and exit procedures.</p>
<i>Strengths</i>	<p>The SEA has provisions to expedite the EL identification process to within two weeks of enrollment if a student enrolls later in the school year.</p> <p>12,000 students in the state have been identified as ELs and receive Title III services. The plan provides specific information about how students are identified in a timely manner, receive services, and the exit criteria. These procedures were developed with a broad stakeholder group providing input.</p>
<i>Weaknesses</i>	<p>It was not indicated that parents served on the initial panel.</p> <p>SEA has not provided a detailed timeline on this revision which will impact many facets of the student accountability system under the ESSA.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

- Does the SEA describe how it will assist eligible entities in helping to ensure that English learners meet challenging State academic standards?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA generally describes available resources for eligible entities from one designated Professional Development Coordinator as well as technical assistance from the Office of Federal Programs, but does not specify how these resources will be used to meet the State-designed long-term goals. While the SEA duly notes the uneven progress English language proficiency, it does not identify how it will assist eligible entities in meeting interim progress measurements.
<i>Strengths</i>	<p>The SEA notes that progress is greater in earlier levels of English language proficiency (ELP) as compared to later, or higher, levels of ELP.</p> <p>A variety of supports including face-to-face workshops, webinars and a handbook are provided LEAs.</p> <p>The plan includes extensive discussion of the range of supports available to EL teachers and students, including where Title III funds are not being used. In particular, the plan notes (p. 79) that: “A Professional Development Coordinator provides on-demand professional development and coaching to EL teachers, tutors and coordinators, as well as to general education teachers with EL students. The focus of this professional development is on equipping teachers to make academic content understandable to ELs, allowing students of varied language proficiency levels to meet the state’s challenging academic standards. A variety of resources also have been produced to support teachers and administrators, including an EL guide for teachers and administrators and a series of webinars focusing on best EL instructional practices.”</p>
<i>Weaknesses</i>	<p>The SEA does not align supports to the varied ELP levels to support eligible entities in meeting long-term goals, and specifically the interim progress measurements.</p> <p>A more detailed description of how additional support will be provided to districts whose EL students do not meet interim progress measures is needed.</p> <p>Only one EL Coordinator for the entire state seems insufficient.</p> <p>The SEA plan does not describe how the various types of technical assistance provided will be measured for impact or result in enhanced EL proficiency.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Some reviewers indicate a need for a clearer description of how the SEA will assist LEAs in ensuring continuous progress toward meeting ELP and statewide academic standards. Additionally, measures of effectiveness for the professional development provided need to be addressed.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	A description of how the state will ensure compliance in the allowable use of funds was described but no text was provided in the response re: the progress of LEAs in the effective use of Title III funds as measured by student achievement. Technical assistance and support was indicated but it appeared the technical support was around compliance and allowable uses of funds and support was professional development for staff but it is not clear whether this support is in response to need generated by lack of student progress. No mention of student progress was indicated in the monitoring of the effective use of Title III funds.
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The SEA does not specifically describe how it will monitor progress of Title III recipients in achieving English language acquisition progress and proficiency. The plan is not clear about how it will take steps to further assist eligible LEAs that have not identified successful strategies.</p> <p>The response focused on statutory compliance rather than improvement of EL students attaining proficiency.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	A detailed plan must be provided outlining how the SEA will monitor each LEA's progress related to EL student proficiency, how it will collect data to ensure strategies used are effective and how it will support LEAs when progress is not being made. The SEA must provide a specific and detailed monitoring protocol indicating how data (e.g. achievement data, demographic data, perception data, etc.) will be used and how tiered support is provided based on LEA need as indicated by the data.