

STATE PLAN  
PEER REVIEW CRITERIA  
Peer Review Panel Notes Template

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STATE: Ohio



**U.S. Department of Education**

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

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

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The ODE (p. 6-9) was granted a flexibility waiver in 2015 to allow students in middle school to take any high school end-of-course assessment in any subject, including mathematics. ODE is requesting to continue its current practice. All middle schools in Ohio are permitted to offer any high school courses provided certain conditions are met, e.g., teachers must have the appropriate certification, course curriculum must be the same as that offered at high school, and alignment of course and the assessment administered. Districts are given the freedom to make choices regarding resource allocation to support access to high school course content by middle school students. The ODE policy requires that students taking advanced coursework in middle school take the aligned assessments. ODE’s policy also encourages opportunities for accelerated and gifted students. The ODE will include ACT/SAT as their 11 <sup>th</sup> grade federal accountability assessment measure for all students who have

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

	<p>taken all the high school assessments as middle school students. The ODE collects data on the number of students accessing these assessments as middle schoolers to support their policy decisions. The students will take a State-administered end-of-course assessment or nationally recognized high school academic assessment as defined in 34 CFR § 200.3(d) in mathematics that is more advanced than the assessment the State administers under section 1111(b)(2)(B)(v)(I)(bb) of the ESEA.</p> <p>During the discussion, one reviewer noted that the ODE does not have a waiver to assess all subject areas in middle school with a higher level assessment. . However, included in its description, ODE describes the process by which middle school students could take the higher level mathematics assessment, including 8<sup>th</sup> grade students, which would not require a waiver.</p>
<i>Strengths</i>	The ODE has identified accelerated classes and works to give options to the 8 <sup>th</sup> graders. All districts in Ohio have local control to provide any high school courses, including Mathematics, English and Biology, to their middle school students for high school credit as long as certain conditions are met.
<i>Weaknesses</i>	<p>Collectively, the reviewers indicated that while ODE meets the requirement of offering advanced mathematics assessments to 8<sup>th</sup> graders, the plan is unclear whether ODE intends to permit students to take exams in other content areas for purposes of accountability, which is likely inconsistent with the statute. In addition, allowing the LEAs to determine appropriate advance course delivery is admirable, but concerns are raised regarding adequacy of access for all students.</p> <p>One reviewer indicated that the ODE should consider clarifying how these strategies will apply to all students.</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>	The ODE (p 9 -11) defines “languages other than English that are present to a significant extent” as those populations that include at least 20% of the state’s English learner (EL) population. Spanish has been identified as the only language other than English meeting that definition. ODE indicates that Somali, Arabic and Chinese count for approximately 5% each of the state’s other languages spoken by the states EL population. (p. 10-11) The ODE has gathered input from stakeholders and regularly engages with LEAs regarding the need for assessment in languages other than English. The ODE collects data regarding students speaking other languages to assist districts in locating translators. The ODE has found it is more effective to reimburse for translation services to be proved at the local level. The ODE also sought input from various community groups representing different language communities as well. The ODE meets their obligation through the provision of a Spanish assessment as well as the provision of translation services.
<i>Strengths</i>	The ODE continues to seek guidance from stakeholders regarding the most appropriate and efficient ways to provide assessments in languages other than English.
<i>Weaknesses</i>	The selection of 20% may exclude certain populations that would benefit from potential resources that would come about from identification.
<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.ii: Existing Assessments in Languages other than English

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The ODE (p. 9) offers state assessments in math, science and social studies in Spanish for grades 3-12. ODE provides funds to districts to provide translation accommodations as well. The Ohio ELA assessments are only administered in English; however, a variety of accommodations are offered. Further, districts are required to provide translation accommodations for ELs, to the extent

	<p>practicable, and the state provides reimbursement to districts for these services.</p> <p>With Spanish as the only identified and targeted language present to a significant extent, assessments have been translated for math, science, and social studies. However, the ODE may want to consider translating assessments for ELA or portions thereof where it does not affect the construct of what is being measured to benefit students who have less experience with English, with the intent to provide a more appropriate picture of where their skills lie, eliminating much of the language barrier.</p>
<i>Strengths</i>	The ODE has provided a comprehensive set of Spanish language assessments and provides resources for translation, presumably in other languages.
<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.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 ODE (p. 10) provides translated assessments in Spanish, the only language currently meeting the ODE’s definition of languages other than English that are present to a significant extent in the participating student population. Assessments are not available for languages other than English and Spanish.
<i>Strengths</i>	While other languages do not meet the state definition for being present to a significant extent in the participating student population, the ODE stated that translation services for students speaking other languages are provided by school districts throughout the state. The ODE provides the funds necessary for school districts to support these translation services.
<i>Weaknesses</i>	ODE may want to consider whether there are components of the ELA assessments that could be translated (e.g., depending on what is being tested).
<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.iv: Efforts to Develop Assessments

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The ODE (p. 10) has translated its non-ELA (Mathematics, Science and Social Studies) assessments into Spanish, in its effort to transition to online testing, it will continue to work to offer translated assessments in the new platforms. This may also enable translated testing in other languages as well. Ohio is working with the American Institutes of Research on this initiative and aims to be fully transitioned to online assessments by the 2018-19 school year.
<i>Strengths</i>	The ODE has listed the mechanisms it employed for gathering meaningful input on the need for assessments in languages other than English and consulted with educators, parents and families and other stakeholders in this process.
<i>Weaknesses</i>	Two reviewers indicate ODE should consider providing additional clarity about how input will be further gathered from stakeholders, how data will be collected, and how ODE will respond to public comment.
<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: 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>	<p>The ODE identifies the required subgroups.</p> <ul style="list-style-type: none"> <li>• All Students</li> <li>• American Indian/Alaskan Native</li> <li>• Asian/Pacific Islander</li> <li>• Black, Non-Hispanic</li> <li>• Hispanic</li> <li>• Multiracial</li> <li>• White, Non-Hispanic</li> <li>• Economically Disadvantaged</li> <li>• Students with Disabilities</li> <li>• English Learners</li> </ul>
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The ODE (p.11-12) includes other subgroups for purposes of reporting only,

	including, but not limited to, children in foster care, military dependents, and homeless children. In addition, a subgroup of gifted students is included in a separate achievement indicator and a separate graded value-added measures.
<i>Strengths</i>	The ODE is working to be inclusive and transparent with their data. This gesture helps to allocate resources to all populations because they are identified.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

#### A.4.i.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>	(p. 12) N/A
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input type="checkbox"/> No (0 peer reviewers) <input checked="" type="checkbox"/> 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 ODE (p. 12) indicates it will use 15 as its minimum n-size for accountability purposes. An n-size of 15 is appropriate to allow data from even small subgroups to be captured and disaggregated. ODE utilizes a stepped-in approach as 15 represents a decrease from its former n-size of 30. This approach means the ODE’s n-size will be 25 in 2017-18, 20 in 2018-19 and 15 in 2019-20.
<i>Strengths</i>	With an n-size of 15 as opposed to an n-size of 30, the ODE has a greater opportunity to meet the needs of the students that require additional support.
<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.ii.b: Statistical Soundness of Minimum N-Size (ESEA section 1111(c)(3)(A)(i))

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The ODE (p. 13-14) asserts that the use of a 15-minimum n-size is sound. With the selection of 15, ODE increases the number of schools that are evaluated for each subgroup as well as the proportion of students in each group that contribute to the overall calculation. Through its proposed

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

	calculation, the ODE is providing a system that is more sensitive to change in performance. The ODE suggests that by increasing the sensitivity of the calculation, ODE maintains statistical validity, even with a lower n-size. The ODE provides a table that illustrates the increased number and percent of students and schools included in a calculation
<i>Strengths</i>	The ODE provides substantial data and information examining the impact of various N sizes on its accountability system in Appendix B.
<i>Weaknesses</i>	One reviewer suggests that with a minimum n-size of 15, ODE should closely monitor its stepped in approach to ensure student privacy and statistical reliability. ODE should consult the IES report, <a href="#">“Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information”</a> .
<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.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 ODE (p. 14-15) conducted an analysis of impact based on various n-sizes. Using the impact data and the Discussion Guide provided in Appendix B, the ODE provided opportunities for the Webinar participants to weigh in on the questions of acceptable exclusion rates and recommended n-size. Most participants indicated between 0 to 5 % exclusion rate was acceptable and most responders suggested reducing the n-size to either 10 or 20 students.  All reviewers indicate that the ODE omitted information about the webinar’s participants and how they were chosen. Additionally, the ODE neglected to give a concise description of how an n-size of 15 was ultimately chosen.
<i>Strengths</i>	ODE took a comprehensive look at the data as provided in Appendix B.
<i>Weaknesses</i>	All reviewers indicated that there is no specific information provided about the webinar participants; so, while ODE offered an opportunity for input, it is impossible to know which stakeholders were included in the discussion. ODE should provide information regarding stakeholder participation.
<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>	ODE must include information describing the stakeholder group represented for the webinar. ODE should also describe how they ultimately arrived at an n-size 15.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The ODE (p. 15) does not display data for groups of students less than 10. A notation of NC (not calculated) is posted on the report. They will implement strategies such as range recoding, suppression of small group outcomes, and suppression of complementary outcomes as a means to provide student confidentiality. ODE states it will either indicate NR (not reported) or <10 in order to mask results, but does not specify how it will be determined which approach to use.
<i>Strengths</i>	All reviewers indicate the strategies identified in the ODE plan complies with federal Department of Education best practices for protecting student privacy.
<i>Weaknesses</i>	Three reviewers indicate that the ODE should consider providing additional detail regarding why they believe these strategies will ensure privacy.
<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?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The ODE (p. 15) had identified a minimum n-size for reporting of 10 students compared to 15 for accountability purposes. On page 15 of the plan, ODE describes how it ensures privacy for students in groups of less than 10.
<i>Strengths</i>	
<i>Weaknesses</i>	One reviewer indicated that the ODE should consider elaborating on the elements of student privacy and statistical reliability to support the reporting of an n-size of 10.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that</i>	

<i>an SEA must provide to fully meet this requirement</i>	
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A.4.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 ODE (p. 15 -17, Appendix A- 104 -107) describes the long-term goals for all students and subgroups based on academic achievement in reading/language arts and mathematics. The ODE includes two measures in establishing their long-term academic goals – one based on the percentage of students achieving proficient or higher on the state assessments, the other is based on a Performance Index that counts each level of performance by each student ODE is using 2015-16 as their baseline year and set a timeline of 10 years (2025-26). The ODE’s goal for students scoring proficient on each state test is at least 80%. Currently, approximately 5 percent of schools and 4% of districts meet the defined long-term goals – ODE indicates that this is evidence of ambitious, but attainable goals. The long-term goals for each of the subgroups are to reduce the gap by 50% between the subgroup baseline percentage and 100% by the end of 2025-26.
<i>Strengths</i>	The ODE plan provides concrete illustrations to demonstrate the calculation of their long-term goals for all students and for each of their subgroups.  The growth anticipation for subgroups is individualized as determined by the baseline data that was used. Each subgroup can reasonably be expected to demonstrate growth to meet half of the achievement gap.
<i>Weaknesses</i>	All reviewers noted that, due to the complex nature of Ohio’s entire accountability system, it is somewhat difficult to assess the ambitiousness of the goal.
<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</i>	

<i>provide to fully meet this requirement</i>
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A.4.iii.a.2: Measurements of interim progress

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The ODE (p. 17 and Appendix A) describes its calculations for determining measurements of interim progress: the interim targets for all students for both the Proficient and Performance Index (PI) are established by dividing the difference between the baseline and the goal and then dividing by 10 (number of years to reach goal). For each of the subgroups, ODE determines its interim progress measures by an expectation of a reduction of 50% of the gap between the subgroup’s baseline score and 100 percent (or 100 for the PI).</p> <p>The ODE’s goals for all subgroups and their respective interim measures seem ambitious; ODE accounts for different starting points, but expects a significant reduction in the achievement gap.</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 or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The ODE (p.17) describes the methodology used to compute interim progress measures specifically designed to make significant progress. This reduction is characterized by a reduction of at least 50 % over 10 years.</p>
<i>Strengths</i>	<p>By having a separate Gap Closing measure, ODE is prioritizing closing statewide proficiency gaps.</p>
<i>Weaknesses</i>	<p>The ODE may want to revisit their progress targets if some subgroups are advancing more quickly or lagging more than others.</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>	
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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>	<p>The ODE (p. 17-18) has described their graduation long-term goals as ambitious since they reflect unprecedented levels of improvement as well as reduction in the graduation gap. The ODE uses the graduation rate of the class of 2015 as the baseline year, but uses current and prior years’ data to inform their decision regarding long-term goals. A 10-year timeline is set (2025-26) for all students and for all subgroups of students. The long-term goal for all students is at least 93%. For each of the subgroups, the long- term goal is established by decreasing the gap by one-half between the subgroup’s baseline score and 100%. For those subgroups for whom closing the gap would have resulted in a higher long-term goal (i.e., Asian and White subgroups), the long-term goals were set at 93%.</p> <p>The goals are ambitious, appropriate and rigorous for nearly all subgroups. The timeline for the goal aligns with academic growth goals and is reasonable.</p>
<i>Strengths</i>	The ODE provides concrete examples to illustrate their methodology. Ohio applies the same standards to all public school students in the state. Ohio has consistency across its measures for the all students group, as well as the measures for each of the subgroups with the same timelines and aligned goals across groups.
<i>Weaknesses</i>	One reviewer indicated that there should be clear direction on how the ODE will reassess graduation goals over time.
<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?  
no
- Does the SEA’s description include the timeline for meeting the long-term goals?
- Is the timeline the same multi-year length of time for all students and for each subgroup of students?
- Are the long-term goals ambitious?
- Are the long-term goals more rigorous than the long-term goals set for the four-year adjusted cohort graduation rate?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The ODE (p. 18 -19) also employs a five-year graduation rate for all students and student subgroups. The baseline data for the all student group is from the class of 2014, as reported on the 2015-16 report card. However, no baseline data was reported for the subgroups. The long-term goal for all students is 95% of students graduating within 5 years of starting high school. This rate is slightly more rigorous than the 4-year rate of 93%. ODE stated that the long-term goal for each of the subgroups is calculated in the same way as the goal for the 4-year rate considering any group for whom the long-term goal would be greater than 95% (Asian), the goal will be 95%. The timeline to reach the long-term goals is 10 years. These goals are reasonably ambitious.
<i>Strengths</i>	It is admirable that Ohio seeks to continue to incentivize schools/districts to work toward graduating students by selecting to include an extended cohort graduation rate in its accountability plan.
<i>Weaknesses</i>	The ODE did not provide the baseline data and the interim measurement data for their five-year extended-year adjusted cohort graduation rate for the subgroups; therefore, it was not possible for the reviewers to assess whether these goals are rigorous.
<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 ODE must provide baseline data for the five year adjusted/extended cohort for each subgroup.

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 ODE (p. 19 and Appendix A) provides measurements of interim progress for the 4-year adjusted graduation rate in Appendix A. All students and each of the subgroups are displayed. However, OH does not provide a like table for the 5-year graduation rate. The same calculation is applied according to OH's response to A.4.iii.b.2, but no actual measurements are provided.
<i>Strengths</i>	
<i>Weaknesses</i>	There is a lack of baseline data and measurements of interim progress toward the long-term goals for the five-year graduation rate for all students and each subgroup of students.
<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 ODE must provide interim progress measurements for the five year extended graduation rate. While ODE provides a calculation methodology, they do not provide a corresponding table.

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 ODE (p. 19) describes their measurements of interim progress in both their responses to A.4.iii.b.1 and A.4.iii.b.2. Based on these calculations, it seems that the ODE has considered the improvement necessary for progress in closing the graduation gaps. While the gaps will not entirely close, significant progress will be made should the goals of closure by at least 50% be met.
<i>Strengths</i>	By having a separate Gap Closing measure for graduation rates, ODE is prioritizing closing statewide proficiency gaps.
<i>Weaknesses</i>	The ODE should provide clear information for all schools, not just schools that fall in the 15 <sup>th</sup> percentile. Additionally, even if the gap goals are met, there may still be subgroups with achievement gaps in graduation rates.
<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>	The ODE (p. 19 – 22 and Appendix A) describes its long-term goal for increases in the percentage of ELs making progress as follows: at least 75% of the EL students meet the expected standards as established by the student-level targets on the Ohio English Language Proficiency Assessment (OELPA). The OELPA measures ELP based on the Ohio ELP Standards. The student level targets consider a student’s initial ELP level using the OELPA and the student’s grade level at the time of initial identification. The annual improvement target for a student will be set each year based upon the performance on the OEPA and the student’s entrance grade level. The ODE has researched their own data as well as EL research to make decisions about improvement targets and timelines. Because ODE recently changed to a new ELP test, it has used data from both their former assessment, The Ohio Test of English Language Acquisition (OTELA - 2014-15) and the new OELPA (2015-16) to inform the setting of goals. The ODE proposes to use a timeline of 10 years for students to achieve language proficiency. The ODE notes that the goal may be revisited with additional years of data from the new test. The long-term goal appears ambitious in light of the fact that, as of 2016, fewer than 5% of the districts would meet the long-term goal.
<i>Strengths</i>	The ODE takes advantage of the flexibility provided by ESSA and recent research surrounding language acquisition to establish student-level targets using a student’s grade level and proficiency level at the time of initial identification. The ODE has used data and past trends to create a specific, metric-driven goal for EL English language proficiency which does not penalize students one year for not meeting their goal the prior year. This creates incentives for schools and districts to continue working hard with their EL students in moving them toward proficiency.
<i>Weaknesses</i>	All reviewers agree that while the ODE has stated that this goal is ambitious because only 5% of districts would be able to currently meet the long-term goal, the 75% meeting targets goal still leaves 25% of students who are not meeting their goals each year. Baseline data was discussed in the Appendix, though the plan did include the methodology for obtaining this information.

<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.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>	<p>The ODE (p. 19-22 and Appendix A) provides its measures of interim progress in Appendix A, Table C. The methodology for calculating the measurements is consistent with the methodology used in academic and graduation measurements of interim progress.</p> <p>Similar to goals for academic growth and graduation rate growth, the goals for interim progress toward the long-term goal for EL students are ambitious and attainable. The timeline and indicators are clearly described.</p>
<i>Strengths</i>	The methodology for determining the measurements of interim progress are reasonable and appropriate given the timeline for reaching the long-term goal.
<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.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>	The ODE (p. 22-28) describes a very complex set of indicators including one it labels as “Achievement Component.” This component is one of six the ODE displays on its State school report cards. This “Achievement Component” consists of two measures – a Performance Index (PI) and an Indicators Met (IM) measure. The PI is a composite measure that includes every student based on their proficiency levels on state assessments in ELA and mathematics. Every student receives points regardless of their performance. Each performance level is assigned a point value that may award bonus points for students taking accelerated math exams.
<i>Strengths</i>	While ODE did not meet the requirement, the SEA has considered an extensive comprehensive set of measures.
<i>Weaknesses</i>	Although the required content area assessment results (ELA and Math) are included the ODE has also included other measures that go beyond the prescribed components. The component may also lose its ability to differentiate given the complexity of the measure.  Two peer reviewers indicated that there needs to be more clarity around the disaggregation reporting of the subgroups.
<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>	ODE must describe the weight of the ELA and mathematics on the Performance Index. ODE includes other subject areas in the academic achievement measures; this does not seem consistent with the statute requirements. It appears as though students taking accelerated assessments in courses other than Mathematics are included; this may be inconsistent with the statute for accountability purposes.

#### 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>	The ODE (p. 28-30 and Appendix B) describes its Other Academic indicator as the Progress Component. The Progress Component considers the growth all students are making based on their individual past performances. Four value-added measures make up the Progress Component. English, mathematics, science and social studies exams, including EOC exams offered at the middle school level, are used in calculating the Progress Component at various grades (4-8). A "Value-Added Growth Index" combines both magnitude and precision of growth. In addition, the ODE generates composite value-added grades for some subpopulations: students with disabilities, students identified as gifted, students whose current and prior year's score places them in the bottom 20% in ELA, math or science. Beginning in 2017-18, ODE will generate and report value-added measures for all required subgroups.
<i>Strengths</i>	The ODE includes in its measure, a "Value-Added Growth Index" which represents the level of certainty around whether the growth or lack thereof is "real."
<i>Weaknesses</i>	The ODE notes that the indicator will be disaggregated for each subgroup, but not graded as part of the accountability indicator. ODE may want to consider including all subgroups in the overall grade.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

#### A.4.iv.c: Graduation Rate

- Does the SEA describe the Graduation Rate indicator used in its statewide accountability system for public high schools in the State, including that the SEA uses the same indicator across all LEAs in the State?
- Does the description include how the SEA calculates the indicator including: 1) that the calculation is consistent for all high schools, in all LEAs, across the State; 2), if applicable, whether the SEA chooses to lag adjusted cohort graduation rate data; and 3) if applicable, how the SEA averages data

(e.g., consistent with the provisions in ESEA section 8101(23) and (25), which permit averaging graduation rate data over three years for very small schools)?

- Is the indicator valid and reliable? Yes
- Is the indicator based on the SEA’s long-term goals?
- Is the indicator based on the four-year adjusted cohort graduation rate?
- If the State, at its discretion, also includes one or more extended-year adjusted cohort graduation rates, does the description include how the four-year adjusted cohort graduation rate is combined with that rate or rates within the indicator? If applicable, does the SEA’s description include how the State includes in its four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rates students with the most significant cognitive disabilities assessed using an alternate assessment aligned to alternate academic achievement standards under ESEA section 1111(b)(2)(D) and awarded a State-defined alternate diploma under ESEA section 8101(23) and (25)?
- Can the indicator be disaggregated for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The ODE’s (p. 30-31 and Appendix B) Graduation Rate Indicator is computed each year for all students and each subgroup of students; the indicator is the percentage of students who graduate with a diploma in four or five years. These rates only include students who earn a regular or honors diploma within 4 or 5 years of entering 9 <sup>th</sup> grade for the first time. The 4-year adjusted cohort graduation rate and the 5-year extended adjusted cohort graduation rate are combined, with the 4-year graduation rate weighted at 60% and the 5-year extended graduation rate weighted at 40%. As with other indicators, Ohio converts the graduation rates into letter grades.
<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.iv.d: Progress in Achieving English Language Proficiency Indicator**

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

	<i>Peer Response</i>
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<i>Peer Analysis</i>	The ODE (p. 32-33) includes the Progress in Achieving English Language Proficiency measure as one of four subcomponents in the Gap Closing component. This measure is based on EL students who have attained proficiency on the OELPA as well as EL students who are improving but have not yet met proficiency. Schools and districts whose EL students have met or exceeded the long-term state goal will be awarded points with the Gap component. Points will also be awarded where the percentage target was not met but did improve from the prior year. The ODE uses all four components, including the Progress in Achieving English Language Proficiency measure to establish letter grades.
<i>Strengths</i>	As mentioned when reviewing its long-term ELP goal, Ohio's establishment of individualized improvement targets for ELs represents a targeted way of measuring growth which is based on a review of data and trends with this population.
<i>Weaknesses</i>	<p>Because ELP is one fourth of a measure in the Gap Closing indicator, Ohio may not be prioritizing EL growth and progress toward proficiency relative to other factors.</p> <p>Two reviewers indicate that it is challenging to determine whether the indicator is valid and reliable due to the complicated calculation required and some vague representations about score assignment (e.g., partial points).</p> <p>The ODE plan would benefit from examples to illustrate their very complex methodology; currently, it does not provide much transparency. In addition, combining all these measures into one indicator may mask insufficient progress.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	ODE must clarify how points are awarded especially with respect to partial points in cases where a percent of students making progress did not meet the state target but improved from the prior year.

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 ODE (p. 33-37) describes two school quality indicators: “Chronic Absenteeism” and “Prepared for Success” measure. The ODE provides a solid research base for choosing chronic absenteeism as one of its School Quality Indicators. The ODE has reported chronic absenteeism and beginning in 2017-18 will include this in its “Indicators Met” measure within the Achievement component. The ODE’s State plan does not indicate specifically what grade span, but based on the calculation and table, it would appear this measure is applied to all grades and schools. The ODE provides a table with benchmarks for all students and each subgroup. The ODE states that it will consider misuse of suspension and expulsion as a reason for demoting the indicator. The ODE has also created a tiered support approach for how schools and districts can respond to chronic absenteeism.</p> <p>The ODE’s second quality indicator is described as the “Prepared for Success” measure. This component uses a variety of measures of college and career readiness, including receipt of non-remediation scores on college admission tests, or receipt of honors diploma or industry-recognized credential. Bonus points can be earned through dual enrollment credits or scores on an AP or IB test. Although not specifically stated, this component seems to pertain to grades 9-12 only. The ODE intends to base the measure on the success of the 4-year cohort only, not the combined 4- and 5-year cohorts. The ODE indicates they are exploring other possible indicators depending on available data and successful pilots.</p>
<i>Strengths</i>	<p>The ODE has identified chronic absenteeism as an issue that directly impacts student achievement. Chronic absenteeism is an indicator of larger barriers the student is facing that may inhibit the student’s academic performance. Utilizing community partnerships to address non-academic barriers can increase district capacity while providing services to students and their families.</p>
<i>Weaknesses</i>	<p>One reviewer indicates it is unclear why there are 6 ungraded measures of the Prepared for Success component, but then the measure of whether a school/district meets the component is based on a combination of these factors with other factors adding bonus points - this should be clarified by ODE.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The ODE (p. 37 and Appendix B) annually differentiates for all its public schools and districts including community charter schools. The ODE combines their 10 measures into 6 components; then these six components are aggregated to produce an overall summative score. All students and each subgroup are considered. The system of annual meaningful differentiation is applied at each measure level, each component level and at aggregated levels.</p> <p>Two reviewers indicated that while the accountability system does include the performance of all students, as well as some subgroups of students, it does not include performance for each subgroup on each indicator.</p>
<i>Strengths</i>	<p>The ODE’s system is highly nuanced and takes into account many different measures each weighted differently in order to create incentives for schools and districts around improvement. This means that schools and districts can also prioritize their own initiatives based on their historical performance and various initiatives/goals. By ultimately wrapping up all scores into one single grade assignment, the ODE is presenting an easy to understand metric for all audiences. The system is consistent across all public schools and districts, including charter schools, allowing for relevant comparisons.</p>
<i>Weaknesses</i>	<p>It may be challenging to assess whether the overall grade assignment will be a meaningful metric for school differentiation because of the complicated nature of the calculations for each component and indicator.</p> <p>One reviewer indicates the ODE’s technical documentation is voluminous; however, not sufficiently transparent to the general non-educator community. The ODE should consider making its technical explanations more readily understandable to their communities.</p> <p>Two reviewers indicated that the aligned system uses multiple measures to identify areas of strength and areas for improvement; however, no explanation was given that demonstrates how this takes place as schools each earn an overall summative letter grade.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>ODE must address how the system of differentiation includes the performance of all students and each subgroup of students on each of the indicators in the plan.</p>

A.4.v.b: Weighting of Indicators

- Does the SEA describe the weighting of each indicator in its system of annual meaningful differentiation, including how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students (e.g., for the Progress in Achieving English Language Proficiency indicator)?
- Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators each receive substantial weight individually?
- Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators receive, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The ODE (p. 37 and Appendix B) describes 4 components – the Achievement Components (consisting of two measures), the Academic Progress Component, the Graduation Rate Component, and the Gap Closing Component. ODE indicates that Academic Achievement, Academic Progress (Other academic), graduation Rate and Progress in Achievement of English Language Proficiency through the measure and component grades contribute more than half of the overall summative rating.
<i>Strengths</i>	The ODE has also explained that if a school or district has one or more components that are ungraded, the remaining components are weighted so that they contribute to the summative grade in the same proportion as when all six exist.
<i>Weaknesses</i>	It is unclear how much weight each of the indicators contributes to the overall accountability system. For example, ODE’s process is not clear regarding how to weigh indicators when one or more component scores will not be calculated due to the minimum n-size not being reached.  One reviewer indicated that the ODE may want to provide a concordance table so that it is more easily discernable how their measures and components tie directly to the federal requirements.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (# 4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The ODE must articulate how the plan meets the federal requirements with regard to the four indicators (academic achievement, other academic, graduation rate and progress in ELP) having substantial weight individually.

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>
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<i>Peer Analysis</i>	The ODE (p. 38-41) describes 5 variations from their annual meaningful differentiation from the ones they apply to the majority of their schools and districts. These variations are (1) schools where no grade level is assessed under the State assessment system;(2) schools with alternative grade configurations; (3) small schools in which the total number of students is less than the minimum number of students; (4) schools designed to serve special populations; and (5) newly opened schools that do not have multiple years of data. Various measures, depending on the specific variations are used to hold these schools accountable. Generally, the ODE uses the same measures to varying degrees for each of the different situations. The exception to this is for Dropout Prevention and Recovery Community Schools where an alternative approach (e.g. approve via their prior ESEA flexibility waiver) is applied.
<i>Strengths</i>	The ODE separately measures dropout prevention and recovery community schools as the student populations at these schools often academically lag behind their peers.  The ODE has a deliberate and thoughtful approach to ensure all schools have some measure of accountability.
<i>Weaknesses</i>	One reviewer indicated that Appendix B presents business rules for calculating many of the existing measures, but it appears there may be missing information to calculate precisely how these other schools fit into the greater accountability framework.
<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>	ODE must provide a more precise description of its methodology for calculating a final summative letter grade and identifying school for comprehensive support in non-traditional schools especially drop-out prevention schools.

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 ODE (p. 41-42) describes its methodology as identifying not less than the lowest performing 5% of Title I schools by using the reports over grade methodology (the summative rating) described in Section 4.V.b. Schools, labeled as “Priority Schools”, will be identified every 3 years, with the first identification occurring in the 2018-19 school year, based on the 2017-18 data.

<i>Strengths</i>	The ODE has developed of their own labels that expand on what is required through ESEA is commendable. The ODE’s addition of the “Watch School” designation for schools that struggle with student subgroups and demonstrate low achievement is an effective part of the gauge for continuous improvement. Three categories of targeted intervention are provided and explained and include the transition from NCLB to ESSA.
<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.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 ODE (p. 42) will identify all high schools with a graduation rate of 67% or lower using the state’s 4-year graduation rate calculation only.
<i>Strengths</i>	The ODE’s methodology results in the identification of high schools failing to graduate one-third or more of their students for comprehensive support and improvement.
<i>Weaknesses</i>	All reviewers indicate that the ODE does not include the year in which it will first identify these schools for comprehensive support and improvement.
<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>	ODE must include the year that they must first identify schools for comprehensive support and improvement.

**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 ODE (p.42) will first identify comprehensive support and improvement schools in need of additional targeted support not exiting such status after the list of priority schools has been updated after the 2020-21 school year. These schools will be identified if the subgroup for which they received targeted support did not show improvement by the end of the third year, after the initial identification.
<i>Strengths</i>	There is clear criteria for identifying which schools will receive comprehensive support based on school performance.
<i>Weaknesses</i>	ODE’s identification where one or more subgroups on its own was performing in the lowest 5% of schools that did not show improvement in the three years following identification as a targeted support school does not meet the requirement that the schools have not satisfied exit criteria ( <i>i.e.</i> , earning a C or better overall, a C or better for Gap Closing and school meets subgroup goals per state requirements).
<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>	ODE must articulate that schools in this category must meet the state’s exit criteria (not “show improvement”) in order to avoid identification as a CSI school.

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 ODE (p. 43) will identify schools for comprehensive support and improvement every three years, starting with the list created following the 2017-18 school year. Upon the second identification (three years later, following the 2020-21 school year), schools originally identified for targeted support where one or more subgroups alone performed among the lowest performing 5% of Title I schools that did not improve, will be added to the list of schools for comprehensive support and improvement.
<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</i>	

<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	
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**A.4.vi.e: Targeted Support and Improvement Schools—“Consistently Underperforming” Subgroups**

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	The ODE (p. 43) refers to these Targeted Support and Improvement Schools with “Consistently Underperforming” Subgroups as “Focus Schools” in their system of support. The ODE defines consistently underperforming as a school where one of the 10 subgroups performed below the average of that subgroup in the Priority schools for two consecutive years. The ODE will calculate the average performance of each subgroup using only the data from those schools designated as “Priority Schools” – that average becomes the standard by which other schools are compared to determine if they meet the consistently underperforming definition. The ODE will include other schools in its Focus designation as well. The criteria will be applied annually.
<i>Strengths</i>	The ODE provides a comprehensive identification system to ensure necessary supports to its LEAs.
<i>Weaknesses</i>	Two peer reviewers indicate it is not clear that this methodology is based on all indicators in the statewide system of annual meaningful differentiation. Further, the additional categories for identification as a Focus school need some more detail (e.g., explanation around multiple subgroup performance benchmarks, etc.).
<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>	ODE must provide a more clear and concise description of how all indicators were used as a part of the methodology to identify schools.

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

- Does the SEA describe its methodology to identify schools in which the performance of any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State’s methodology under ESEA section 1111(c)(4)(D) (i.e., the methodology described above in A.4.vi.a), including: 1) whether the methodology identifies these schools from among all public

schools in the State or from among only the schools identified as schools with one or more consistently underperforming subgroups and 2) if applicable, how the SEA averages data (e.g., does the State use a uniform averaging procedure across all schools)?

- Does the SEA’s methodology result in identification of such schools? Does the SEA include the year in which the State will first identify such schools (i.e., does the timeline comply with the Department’s guidance)?
- Does the SEA include the frequency with which the State will identify such schools after the first year of identification?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The ODE (p. 43-44) will generate a new Focus Schools list using the 2017-18 accountability measures. The ODE will then update the list every three years after the 2020-21 school year. A school will be identified if it has one or more subgroups performing at a similar level as the lowest 5 percent based on its individual subgroup performance. It appears the calculation includes all schools in the state. If a school does not improve, its level of support will be escalated to comprehensive support.
<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.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>	The ODE (p. 44) includes one additional category of schools. The ODE labels these schools as “Watch Schools.” Watch Schools are described as those schools who have received state funding to serve one of 4 specific subgroups (SWD, EL, gifted and ED) and one or more of these groups did not show satisfactory achievement OR progress. The ODE will update the list annually; the two most recent years of data are used to identify these schools. The Watch Schools criteria is based on State of Ohio law.
<i>Strengths</i>	The ODE identifies students in state-prioritized categories, as well as the federal required subgroups for additional support.
<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</i>	

<i>an SEA must provide to fully meet this requirement</i>	
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**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 ODE (p. 44-45) factors in participation of students in statewide mathematics and reading/ELA assessments into multiple measures of its accountability system. The Performance Index score is impacted by the percentage of tests taken; districts earn 0 points for every test not taken, which may result in a lowering of one or two levels of district letter grades. The Gap Closing measure also takes participation into account and the calculation is done separately for ELA and math for each subgroup. If one or more subgroups fail to meet the 95% participation rate, the final grade is reduced by one level.
<i>Strengths</i>	The ODE takes the 95% participation rate very seriously, demoting a level for even one subgroup missing the 95% participation rate even by 1%.
<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.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 ODE (p. 45) states that the exit criteria for the “Priority Schools” (comprehensive support) will be based on the revised report card measures, including the revised Gap Closing measure, which includes achievement, progress and graduation rate data for all required subgroups. The ODE has established a maximum time frame for improvement for its Priority Schools as 4 years. The exit criteria includes the following: school performance is higher than the lowest 5% for two consecutive years, school earns a 4-year graduation rate of better than 67% for two consecutive years, and no subgroups perform at the lowest 5% of schools.
<i>Strengths</i>	Schools have a maximum number of four years in which to meet the criteria to exit the comprehensive support and improvement designation. The exit criteria ensure continued progress to improve student academic achievement and school success. The ODE’s exit criteria are sufficiently rigorous.
<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.viii.b: Exit Criteria for Schools Receiving Additional Targeted Support (ESEA section 1111(d)(3)(A)(i)(II))

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The ODE (p. 45) exit criteria for Ohio’s Focus Schools will be based on their revised accountability (report card) measures, including the Gap Closing measure. The maximum time frame for improvement is 4 years.
<i>Strengths</i>	
<i>Weaknesses</i>	While ODE meets this requirement, the plan would benefit from a more robust description of how the exit criteria will ensure continued progress.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The ODE (p. 45-46) will provide direct support for schools that fail to meet the exit criteria within a given timeframe. Direct support may come from the educational service center in the form of targeted curriculum alignment, instructional strategy supports, assistance with the use of formative assessment, or professional development for teachers and leaders.</p> <p>The ODE will employ many strategies for districts (and schools) who fail to meet the prescribed exit criteria in four years. These strategies include: Direct support from education service centers (ESC) or State Support Teams (SST), or Information Technology Centers (ITC). Districts would be required to provide quarterly expenditure reporting as well. In addition to the directed support, connections with peer-to-peer networks will be provided. These districts will participate in a comprehensive district review designed to analyze current practices against evidence and research-based practices. Other interventions required through the State of Ohio educational laws are possible as well, such as additional oversight on expenditures, on-site reviews, more in-depth resource allocation reviews, and possible school closure.</p>
<i>Strengths</i>	Schools that do not make significant progress as outlined in the plan may be subject to more rigorous interventions such as required “on-site review,” in-depth resource allocation reviews, more rigorous

	requirements on tiers of approved evidence-based strategies and required direct student services. The ODE lists various examples of the rigorous interventions.
<i>Weaknesses</i>	The ODE describes more rigorous interventions for “districts.” Schools targeted for assistance that do not make the necessary improvements for assistance, the ODE states there will be “more” rigorous interventions. However, the plan would benefit from clarifying what the interventions entail.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.viii.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>	The ODE (p. 46) has a state funding formula that been used to collect and report school-level expenditure data for many years. The ODE includes school-level expenditure information on each LEAs report card. Also, the ODE states that it will conduct periodic resource reviews; this process will identify inequities that affect student access, analyze data to determine acceptable allocations and use this information to inform needs assessment, improvement planning, funding allocations an expenditure patterns. Each year, the ODE reviews LEA expenditure data by fund and function.
<i>Strengths</i>	ODE collects a large amount of information, including financial data, on a regular basis about all state schools/districts so the information is readily available for review. The ODE reviews expenditure data from LEAs by fund, function and object of expense. This data can inform school improvement activities and identify areas within an LEA to focus resources.
<i>Weaknesses</i>	The ODE may want to consider adding additional information on how it will review resource allocation to support school improvement in each LEA serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The ODE (p. 47-51) describes an extensive differentiated system of technical assistance for its “Priority Schools” and “Focus Schools”. These supports include: evidence-based improvement systems; regional support structures, the Ohio Improvement Process framework, career pathways, an online clearinghouse of evidence-based strategies, increasing the SEA research capacity internally and with partners, and peer-to-peer improvement networks. Underpinning these technical assistance strategies is ODE’s overall school improvement system. The ODE approves LEA plans for Priority Schools, and the LEA is responsible for approving Focus School plans. A range of interventions and technical assistance strategies are provided based on a District Continuum of Support beginning with Independent Districts, Moderate Support District, Intensive Support Districts, and ending with Districts under an Academic Distress Commission. The need determines the level of intervention as well as support. The ODE has gathered significant stakeholder input in establishing the Continuum of District Support.
<i>Strengths</i>	The ODE seeks to highly individualize and differentiate its technical assistance. The district improvement support is based on each district’s needs and targeted initiatives. It seeks to identify state-approved evidence-based interventions and to support districts and schools in the development and implementation of support and improvement plans.
<i>Weaknesses</i>	The ODE could clarify how the activities will be implemented and monitored.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	(p. 52) NA
<i>Strengths</i>	

<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input type="checkbox"/> No (0 peer reviewers) <input checked="" type="checkbox"/> 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.5: Disproportionate Rates of Access to Educators (ESEA section 1111(g)(1)(B))**

- Does the SEA describe the extent, if any, that low-income children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers?
- Does the SEA describe the extent, if any, that minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers?
- Does the SEA describe the measures (*e.g.*, data used to calculate the disproportionate rates) that it will use to evaluate and publicly report its progress with respect to how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers?<sup>3</sup>

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The ODE (p.52-55 and Appendix C) lists a number of activities focused on addressing gaps that reflect disproportionate access to effective, in-field and experienced teachers by low income minority students especially those in schools assisted under Title I, Part A. The ODE defines the same terms for their principals. The Ohio Educator Equity plan identified root causes for such inequities including educator preparation, hiring and deployment practices, teaching and learning conditions, and limited data use.</p> <p>The ODE describes the disproportionate rates and gaps in rates in Table 15 on p. 54 of the Plan. The Table describes the rates at which low-income and minority students are place with an out-of-field, or inexperienced teacher. For rates at which low-income and minority students are placed with ineffective teachers, the ODE provides</p>

<sup>3</sup> Consistent with ESEA section 1111(g)(1)(B), this description should not be construed as requiring a State to develop or implement a teacher, principal or other school leader evaluation system.

	<p>information at the building level only. Table 16 on p. 55 displays the percentage of ineffective teachers in Title I schools vs Non-Title I school for both low-income and minority students.</p> <p>The ODE also utilizes an “educator workforce strength index” to monitor progress of these qualities and effectiveness of the educator workforces. The ODE will evaluate and publicly report progress on the measures as described on the SEA website with annual updates.</p>
<i>Strengths</i>	The ODE has evaluated its disproportionality in access to educators as part of its compliance measures for some time and has an overarching goal that it will continue to work towards as part of its ESSA compliance.
<i>Weaknesses</i>	The ODE may wish to provide more explicit information around how it will review its progress in this area as it indicates it will continually review these measures to determine if the appropriate measures are being addressed in planning.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The ODE requires a systemic approach to address all conditions for learning, including measures of school quality and student success such as safe and supportive school climate, positive behavioral interventions and supports, social and emotional learning, and family, school, and community partnerships. The ODE (p. 55-61) has an overarching goal to support the social and emotional well-being of all students. The ODE uses the State Board adopted Ohio School Climate Guidelines to promote the creation of school conditions that foster student success. These Guidelines provide schools and districts with 9 specific principles and strategies, accompanied by benchmarks. OH uses the document as a framework for technical assistance, professional development and information dissemination.</p>

	The ODE will collaborate with stakeholders to identify evidence-based resources and best practices that will contribute to a positive learning environment. The State of Ohio educational laws require all LEAs to enact anti-harassment, anti-intimidation and anti-bullying policies. The Ohio State Board offers a model policy that LEAs use to develop their own local policies. The State model policy requires district policies to contain certain provisions to ensure reduction of incidences of harassment and bullying. The ODE also publishes Anti-bullying Guidance for LEAs for the identification, investigation and intervention in bullying behaviors. The State of Ohio educational laws also require training every 5 years including anti-harassment and anti-bullying topics.
<i>Strengths</i>	The ODE describes a fairly comprehensive set of initiatives, plans and technical assistance around improving school climate and social-emotional learning.
<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.7: School Transitions (ESEA 111(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 ODE (p. 62-67) has various initiatives connected to early childhood and full K-12 span. The ODE has developed a set of strategies and supports to ensure that LEAs and schools meet the needs of students at all levels of schooling. These general strategies and supports include: A Cohesive and Aligned Framework of Standards, Assessments, Graduation Requirements and Accountability; the Ohio Improvement Process (OIP), Comprehensive Continuous Improvement Planning (CCIP), and School Climate/Conditions Resources; State-Level Supports, directly and Through Regional State Support Teams; Educational Service Center; Career-Focused Instructional Practices and Programs.</p> <p>In addition, the ODE provides specific supports for certain defined student populations, including, students with disabilities, migratory youth, neglected and delinquent youth, English learners and homeless</p>

	students.
<i>Strengths</i>	The ODE has a robust plan in place to ensure that the needs of students at all levels of schooling are addressed.
<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>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The ODE (p. 87-88) describes a 2-step process for the entrance procedure the Home Language Survey (HLS) which is required to be administered to all students within 30 days of enrollment. Results of the HLS are reported to the SEA. The ODE uses the OELPA to determine acquisition of English language skills to determine if a student is an English learner. An EL student is exited from the program when the student has attained a proficient performance level on the OELPA. Exited EL’s are then classified as former ELs are then monitored. The ODE states that it will establish and provide guidance for possible exceptions to the exit criteria.
<i>Strengths</i>	There is a standard assessment called the OELPA used to determine student growth and progress toward proficiency.
<i>Weaknesses</i>	The ODE did not provide a clear timeline for when students will be assessed for English Proficiency upon enrollment. Therefore, districts may not be able to provide support to ELs in a timely manner to ensure students are given proper supports.  Two reviewers state the ODE does not include information about timely and meaningful consultation with LEAs representing the geographic diversity of the state.
<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 ODE must explicitly state that they will assess students for English Proficiency within the first 30 days of enrollment in school. In addition, ODE must clarify which English Language Screener will be mandated for all schools.</p> <p>The ODE must include information about timely and meaningful consultation with LEAs representing the geographic diversity of the state.</p>

## 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 ODE (p. 88-89) provides a variety of statewide initiatives, technical assistance, and resources available to schools/districts for improving outcomes for EL students. Included in these services are a state operated resource center providing TA and PD resources, the state EL Advisory Committee review state policies and provides feedback on best practices, regarding improving educational programs; commitment to an integration and coordination of services throughout the SEA; partner collaborations with state and national experts, and TA and resources specific to sheltered English instructional strategies. In addition, LEAs must identify how they will use grant resources to meet the needs of the English learner students.
<i>Strengths</i>	The ODE is focused on an “integrated EL” approach within its statewide improvement initiatives including the Comprehensive Continuous Improvement Plan initiative, as well as the Ohio Improvement Process, both of which appear throughout its ESSA application.
<i>Weaknesses</i>	Two reviewers indicate that although many entities involved with ensuring EL met challenging standards, ODE should provide more clarity around the process for how assistance will take place. One reviewer suggested that the ODE consider strengthening the connection between the strategies and how they will be used to impact EL proficiency and achieving success on the state’s academic standards.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The ODE (p. 89 – 90) monitors the progress of eligible entities through the collection and reporting of data as part of ODE’s accountability system. All entities must annually complete a self-assessment to ensure all requirements, both programmatic and fiscal, are met. Some entities are selected to more intensive monitoring, either a desk or on-site review using a risk assessment tool. When strategies do not prove effective, the ODE has assigned staff that will work with the entity to make change to their improvement plans; in some cases, specifically for English learners.
<i>Strengths</i>	The ODE has a multi-leveled structure for monitoring data and providing increasing support and oversight into the improvement planning process for districts not making sufficient progress with EL proficiency.
<i>Weaknesses</i>	Two reviewers indicate that the ODE could provide specificity concerning how these initiatives will be implemented, including more information on the “Title III consortia,” logistics for monitoring, etc. in order to create a firmer picture of how these initiatives will lead to improved outcomes after other strategies have proven ineffective.
<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>	