

STATE PLAN PEER REVIEW CRITERIA Peer Review Notes Template

STATE: Oklahoma



U.S. Department of Education

Background

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

Role of the Peer Reviewers

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

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

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

How to Use This Document

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

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

Instructions

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

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

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

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

A.1: Challenging State Academic Standards and Assessments

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	Not applicable (NA) – Oklahoma State Department of Education is not taking advantage of the 8th grade exception and has an assessment in Grade 11 that meets the high school requirement. (pp 51-52)
<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.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

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

- 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 Oklahoma State Department of Education (OSDE) defines the presence of languages other than English as “students speaking a given language must both qualify as English Learners (EL) and make up more than 5% or more of the total student population.” At 6%, Spanish is the most populous language other than English that is present in the total tested student population. (pg. 53) OSDE did not 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. This is particularly important as Oklahoma has among the highest number of tribal students in the nation at more than 130,000 (pg.34). In addition, there is no provision for identifying LEAs or schools with a significant portion of the student population speaking a language other than English.
<i>Strengths</i>	OSDE provides oral language translations for Spanish.
<i>Weaknesses</i>	OSDE did not describe how it considered languages other than English that are spoken by distinct populations of English learners. OSDE does not identify significant populations of students speaking languages other than English in LEAs or across grade levels.
<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>	OSDE should: <ol style="list-style-type: none"> 1) 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; and 2) Identify significant populations of students speaking languages other than English in LEAs; and 3) Identify significant populations of students speaking languages other than English across grade levels.

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>	OSDE does not identify any existing assessments in languages other than English. However, OSDE offers Neutral Latin American Spanish oral language translations for grade 3-8 and 10th grade mathematics and science assessments and 10 grade history assessment. (pg. 54) Given that the oral translation is valid, reliable, and accessible to Spanish speaking students, this is a reasonable accommodation. In addition, OSDE supports LEAs that wish to produce written translations of state exams. Note that the state is no longer offering state developed high school assessments in ELA or mathematics and does not mention the availability of SAT or ACT college readiness assessments or translations in Spanish.
<i>Strengths</i>	The state is working on making additional options available to support English language learners.
<i>Weaknesses</i>	OSDE does not currently administer any written assessments in languages other than English. Only oral translations are available, not actual translated tests, and the State does not indicate if assessments in other languages may be necessary for individual LEAs or grade spans with significant numbers of Spanish speaking students.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.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>	OSDE listed Spanish as the only language for which student academic assessments are not available and are needed (pg. 54).
<i>Strengths</i>	
<i>Weaknesses</i>	No data provided to indicate if other assessments are needed by LEA or grade span.
<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>	

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

A.3.iv: Efforts to Develop Assessments

- Does the SEA describe how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population, as defined by the SEA and identified under A.3.i of the consolidated State plan template?
- Does the SEA’s description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include the State’s plan and timeline for developing such assessments?
- Does the SEA’s description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include a description of the process the State used to:
 - 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>	OSDE identifies Spanish speaking students as the only student group representing 5% or more of the student population. Based on feedback received from its Title III consortium members, OSDE began to offer oral language translation of state assessments in Neutral Latin American Spanish in 2017. OSDE states that funding challenges do not permit provision of Spanish-translated written versions of state tests (p.55). OSDE indicates that it supports LEA efforts to develop and provide written Spanish translations of state tests. Further information is not provided about LEA efforts to do so and if the results of these efforts are shared statewide.
<i>Strengths</i>	The development of oral language translations for state assessments for their Spanish speaking students as an accommodation. OSDE indicated that their consultation with stakeholders prompted them to provide oral translation of state assessments. The translated assessments were provided based on work with the Title III consortium.
<i>Weaknesses</i>	The SEA did not indicate any plans to develop written Spanish versions of state assessments. It is not clear if the oral translations of these assessments are standardized e.g.– computer-based and therefore standardized oral test administrations. A description of efforts to access funding for written translations and a

	corresponding timeline of such efforts is not provided.
<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>	OSDE should: <ol style="list-style-type: none"> 1) Describe how it will make every effort to develop assessments in Spanish (the language the state identified as being spoken by at least 5% of the student population) and include a timeline for development; and 2) Describe the process the State used to: <ol style="list-style-type: none"> a. Gather meaningful input on the need for assessments in languages other than English; b. Collect and respond to public comment; and c. Consult with educators, parents and families of English learners, students, as appropriate, and other stakeholders.

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>	OSDE identifies students from the following major racial and ethnic groups white, Hispanic/Latino, Asian, Black/African American, American Indian, Native Hawaiian/Other Pacific Islander, and two or more races as subgroups for “reporting purposes.” OSDE also indicates it will report academic performance for homeless students, students in foster care, students with a parent who is a member of the Armed Forces, and is considering including as a subgroup, students with incarcerated parents. It is not clear what OSDE means by the statement that it will use “different subgroups for the academic achievement indicator in the state’s accountability system” (pg. 57).
<i>Strengths</i>	The state goes beyond required subgroups in the reporting system to include homeless, students in foster care, students with parents in the armed forces, and is considering adding students with incarcerated parents.
<i>Weaknesses</i>	It is not clear which subgroups will be used for “reporting” and which for “accountability” – and why the State is using different criteria. This could be problematic and confusing to the public.
<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>	OSDE should provide the list of each major racial and ethnic group that the SEA will include as a subgroup of students in its accountability system.

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>	OSDE states “Not Applicable” so we are to assume no additional subgroups will be included in the accountability system beyond those required. (economically disadvantaged students, students from each major racial and ethnic group, children with disabilities, and English learners). However, as noted above, the State plans to use different subgroups for the academic achievement indicator and for reporting. Again, this could be problematic and confusing to the public.
<i>Strengths</i>	
<i>Weaknesses</i>	It is not clear which subgroups will be used for “reporting” and which for “accountability” – and why the State is using different criteria.
<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>	NA - OSDE selected exception option “ii” for recently arrived English learners. The State will exclude recently arrived English learners from proficiency and growth calculations in the accountability system in the first year of enrollment, include these students in the second year of enrollment, and include the third year and thereafter.
<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>	OSDE will continue to use an n-size of 10 for all accountability indicators. This decision was made through discussion of the Assessment and Accountability Task Force. This N-size should ensure that a high number and percentage of schools and student subgroups are included in the statewide accountability system.
<i>Strengths</i>	<p>The OSDE Assessment and Accountability Taskforce took into consideration reliability, validity, and meaningfully differentiating schools when determining to continue the n-size of 10.</p> <p>OSDE reports it will continue to use an N-size of 10 for all accountability indicators, including assessment participation and data reporting (pg. 59). It is less likely for populations of students to be missed through the use of a small n-size.</p>
<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?²

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSDE chose an n-size of 10 based on having a significant number of small schools – 57 that had fewer than 30 students tested. OSDE believes that using a minimum N-size of 10 for calculating indicators in Oklahoma’s accountability system will allow for greater transparency for rural schools and underrepresented student groups. If an N-size of 10 cannot be met in a single year for a student group, Oklahoma will aggregate data up to three prior years in order to reach an N-size of 30. OSDE neglected to describe how this decision was determined to be statistically sound.
<i>Strengths</i>	The state wants greater transparency for rural schools and underrepresented student groups.
<i>Weaknesses</i>	OSDE does not describe <u>how</u> an n-size of 10 was determined to be statistically sound.
<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>	OSDE should provide the necessary research and documentation as to why an n-size of 10 is considered statistically sound.

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>	OSDE held regional meetings across the state and convened the Oklahoma Assessment and Accountability Task Force to discuss the technical and policy issues around the assessment system, including n-size. Those giving input included a wide variety of stakeholders (including teachers, principals, other

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

	school leaders, parents). In addition, the ESSA State Plan Draft 1 survey included a question regarding n-size. Because many comments on the survey reflected the desire for a lower n-size (lower than 30), the state selected an n-size of 10.
<i>Strengths</i>	OSDE collected statewide input using multiple data collection tools, both qualitative and quantitative. Expansive input collected across the state from the many stakeholders.
<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.d: Minimum N-Size and Ensuring Student Privacy (ESEA section 1111(c)(3)(A)(iii))

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSDE ensures that student information remains private by employing complementary suppression when all or no students score a certain level. The state ensures the same privacy for groups of students. In addition, the state never reports on groups of less than 10 students.
<i>Strengths</i>	The State has well-articulated privacy rules. Using logic beyond just a minimum n-size of 10 to protect student identifiable data.
<i>Weaknesses</i>	The “Second-lowest N-size will be suppressed” statement (Pg. 60) is confusing. Other suppression logic regarding n-sizes could also be employed such as never publishing the actual n-size and applying other percentage logic when slightly higher counts of student data is reported.
<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>	

³ See footnote 5 above for further guidance.

<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	
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A.4.ii.e: If Applicable, Minimum N-Size for Reporting

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	NA – The OSDE minimum n-size is 10 for reporting and for accountability. This number is consistent with respect to privacy and statistical reliability.
<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: 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>	OSDE is moving from reporting percent proficient on state exams to a scale score reporting model using the newly developed state assessments in school year (SY) 2016-17. Therefore, the state will determine the minimum rate of improvement and each student subgroup using 2016-17 as the baseline. Long

	term goals will be set based on two criteria: 1) By 2025 the overwhelming majority of all students will be expected to achieve a scale score that indicates their readiness for college or career, and 2) The goals must be far enough from the baseline such that each interim goal is both statistically significant and meaningful. OSDE “anticipates setting interim goals for academic achievement by December 2017” (pg. 61). No achievement data is provided (using previous assessments). Hypothetical goals have been set. No discussion of equating tests to set long term goals based on past performance.
<i>Strengths</i>	Broad criteria are described for long term goal setting. Plan for setting goals is sound.
<i>Weaknesses</i>	Data not available to actually set goals yet. In moving to a new reporting metric, there is a concern whether a scale score is more understandable by students, parents and the community than meeting standards.
<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>	OSDE should describe the ambitious, long-term goals for improved academic achievement for all students and each subgroup of students to include baseline data and a timeline for meeting the long-term goals.

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>	OSEA’s long term goal is that by 2025 students meet grade level standards within each assessment content area, indicating that they are on track to be college and career ready upon high school graduation. No achievement data is provided (using previous assessments). Hypothetical goals are set. Since the “8 year incremental projections will be set on the previous 10 years of student achievement data” (pg. 61), the state could have provided that data to set projected goals which could then be equated using actual performance on the new assessments. OSDE reports that it anticipates setting interim goals for academic achievement by December 2017.
<i>Strengths</i>	Broad criteria are described for measurements of interim progress toward meeting the long term goals.
<i>Weaknesses</i>	Measurements of interim progress are not yet available.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must</i>	The SEA should provide measurements of interim progress toward meeting the long-term goals for all students and each subgroup of students.

provide to fully meet this requirement

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>	OSDE will set interim goals to show how well students in each subgroup are progressing toward reaching proficiency. The targets for each student group will increase so that by the year 2025, nearly every student within each group will meet grade-level standards. No achievement data is provided (using previous assessments). Hypothetical long term goals and measurements of interim progress are set in their plan (Appendix pg.5). The goal for nearly every student meeting standards (pg. 61) seems unrealistic, especially with new, more rigorous standards (pg. 45).
<i>Strengths</i>	Broad criteria are described for long term goal setting. Using the review of prior performance to help estimate if future goals are ambitious.
<i>Weaknesses</i>	Expectation that nearly all students will meet grade level standards within the next 8 years may be too optimistic.
<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>	OSDE must develop long-term goals and measurements of interim progress for academic achievement that 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.

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>	OSDE’s long term goal for graduation rate is 90% for <u>all</u> subgroups by 2025. Baseline data is included for each student group. The long term goal is

	ambitious as the state’s current graduation rate is 81.6%. In addition, the state has experienced decline in graduation rates over the last three years. The EL subgroup at 57.9 in 2016 will need to increase at a rate of 3.6% to meet the goal of 90%. (pg.63)
<i>Strengths</i>	Intermediate goals have been determined for each subgroup to incrementally reach the 90% goal by 2025. All students and each student subgroup are expected to attain the same graduation rate. The long term goal of 90% for all students is ambitious given the starting point in the low 80s.
<i>Weaknesses</i>	Data prior to 2016 was not provided to indicate exactly how ambitious the graduation rate is for each subgroup.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSDE has not yet established long term goals for graduation rates that include five and six-year cohort graduates. The state will examine baseline data and establish ambitious goals when the extended-year graduation information is available in March 2018 (pg. 64). The goals will be measurably higher with each additional extended year cohort. It is not clear why the State is unable to set these goals until graduation rates are posted in 2018 unless 2016-2017 was the first year to collect one or more extended-year rates, but even then, March 2018 seems delayed.
<i>Strengths</i>	
<i>Weaknesses</i>	It’s not clear why these goals have not yet been set. On page 62 the state

	indicated that the state’s graduation rate had been declining the prior 3 years, but changes to the diploma requirements or what the state will be doing to support the challenging goals were not provided. If it is possible to set long term goals for the 4 year cohort, it should be possible to provide long term goals for the 5 and 6-year cohorts.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input 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>	OSDE should provide the extended year cohort graduation rate goals, including baseline data, data by subgroup, timeline for meeting goals, and data to support goals being more rigorous than 4-year rate goals.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSDE’s long term four-year adjusted cohort is at 90% for all subgroups by 2025. Goals for interim progress towards meeting a graduation rate of 90% for each subgroup was provided. (pp 63-64) The five – and six-year cohort rate will be set in March 2018.
<i>Strengths</i>	<p>Intermediate goals have been determined for each subgroup to incrementally reach the 90% goal by 2025.</p> <p>The SEA established ambitious interim progress measurements toward the long-term goal for the four-year adjusted cohort graduation rate for all students and student subgroups.</p> <p>Very ambitious goals for some groups, especially if the state had been witnessing a decline over the past three years.</p>
<i>Weaknesses</i>	Information for five- and six-year cohort graduation rates was not provided.
<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>	OSDE must provide interim progress measurements for five- and six-year cohort graduation rates for all students and for each subgroup of students.

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>	OSDE established long-term goals and measurements of interim progress for the four-year adjusted cohort graduation rate that take into account the improvement necessary for subgroups of students who are behind in reaching those goals. Each subgroup of students has a different rate of growth dependent upon how far that group is from meeting the goal of 90% graduating by 2025. By 2025, the goal is to have at least 90% of students in each subgroup graduating from high school. However, OSDE has not yet provided long-term goals and measurements of interim progress for five- and six-year cohort graduation rates, so it cannot yet be determined if subgroups who are behind in reaching these goals require greater rates of improvement. (p. 64)
<i>Strengths</i>	The state acknowledges and is attempting to eliminate the graduation gap between groups of students. Using the same goal for all populations of students puts the focus on closing the achievement gap.
<i>Weaknesses</i>	Goals and measurements of interim progress for five- and six-year cohort graduation rates have not yet been set.
<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>	OSDE must provide long-term goals and measurements of interim progress for the five- and six-year adjusted cohort graduation that 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.

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>OSED’s long term goal is that 66% of EL students will be on track for meeting EL proficiency by 2025. Using a baseline of 50% from the 2014-15 WIDA ACCESS 1.0 assessment, the State has set a long term goal to achieve a 16-point increase in the percentage of students on track to English proficiency in 10 years. The rate of increase will be less than 2% a year. Each student will have a specific trajectory for growth based on grade level and level of proficiency when entering into the EL program. Appendix A, pg. 8 states, “The measure of English language proficiency assessment (ELPA) progress will be the percentage of students making their target.” No data was provided to determine if the long term goal is ambitious. Since the State assumes a year of learning should result in one scale score level of growth and expects “all ELs to achieve proficiency according to their trajectory,” (pg.65) it appears that the state could require nearly 100% EL progress. The state notes that the baseline is expected to change as a result of potential new cut scores and the new WIDA ACCESS 2.0. Since WIDA revised the ACCESS in 2017, baseline data was not available at the time of the State Plan development. However, once that data is available, the SEA will re-establish long-term and interim goals for students on track to EL proficiency. After 2 years of data collection, Oklahoma will begin including this measure in the accountability system in 2018.</p>
<i>Strengths</i>	<p>Some peer reviewers felt that a goal of exiting EL services within 5 years is ambitious since research supports that ELs may need up to 7 years to exit.</p> <p>Tracking students for 4 years after exiting services will allow the school to quickly identify students who may slip backwards and need additional services provided.</p>
<i>Weaknesses</i>	<p>The ELP long term goal is not ambitious because only 66% of ELs are expected to be on track to proficiency 8 years from now (10 years from the baseline). This contradicts the SEA’s expectation that “all English learners ultimately will achieve proficiency according to their trajectory relative to the grade level and ELP upon initial assignment” (pg. 65).</p> <p>Baseline data for the new WIDA assessment and actual goals and measurements of interim progress were not provided.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (4 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>Ambitious goals and timelines should be established to meet the SEA’s expectation that “all English learners ultimately will achieve proficiency according to their trajectory relative to the grade level and ELP upon initial assignment” (pg. 65):</p> <p>(1) If the State does not elect to adjust the baseline data based on the new assessment; or</p> <p>(2) If the State elects to use the new WIDA 2 baseline data.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSDE will develop interim goals based on each student’s grade level and proficiency level when entering the EL program. Interim targets will be developed based on the assumption that one year of learning should result in on scale score level of growth on the ELPA (p 66). The SEA did not 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 because baseline data was not available at the time of the State Plan development. However, once the 2017 ACCESS scores are available, the state will establish measurements of interim progress towards attainment of English language proficiency. This plan makes sense, but in this section, OSDE seems to have mixed up the indicators. On page 66, “Oklahoma has set an ambitious goal that the percent of students exiting the EL program will increase at a rate of 2% per year from 50% to 66%. This represents a 16% increase between 2017 and 2025.” This requirement is asking for increases in the percentage of English learners making progress in achieving English proficiency, not ELs exiting the EL program.
<i>Strengths</i>	Each student will have a growth target customized based on their individual English language proficiency.
<i>Weaknesses</i>	OSDE has not yet developed interim goals for ELP. The plan is confusing as OSDE seems to have mixed up the indicators on page 66 as noted above in the peer analysis.
<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>	OSDE should provide measurements of interim progress toward the long-term goal for increases in the percentage of ELs making progress in achieving EL proficiency. The long term goal should be ambitious as described above in section A.4.iii.c.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>	<p>OSDE describes multiple measures it will use for its Report Card Indicators. Indicators for grades 3 to 8 are ELA, mathematics and science status, ELA and mathematics growth, ELPA progress, and chronic absenteeism. Indicators for high schools are ELA, mathematics, and science status, graduation rate, postsecondary opportunities, ELPA progress, and chronic absenteeism. OSDE will report by disaggregated subgroups. Weighting of each indicator is found in Figure 7 on pg. 77. ELA and mathematics proficiency are equal. ELP is equal to ELA and/or mathematics. Total possible points are 90.</p> <p>Interim goals will be set based on ambitious and achievable progress from the baseline, with the end goal of all students from all groups meeting grade level standards.</p> <p>For the baseline year, achievement will be defined as the scale score in which 60% of the students score below. In order to achieve an A, each school will need to exceed expectations with the long term goal for all students groups meeting grade level standards. For calculating the Academic Achievement Indicator, each student will be assigned to only one subgroup, employing a logic such that students will first be assigned based on low socio economic status, then in the following order based on lowest performing subgroup to highest such that the subgroups of most need will be focused on first: students with disabilities, ESL, black, Hispanic, native American, and finally Overall. The theory behind this decision is the desire to keep different groups from being overrepresented and in order to also incentivize teachers to work in more struggling schools. The required ESSA reporting of students by subgroup will still be done in order to compare student performance with long-term and interim goals. The state is still deciding exactly how the academic achievement indicator will be calculated and is currently debating two different methodologies. (pp 66-68)</p> <p>It is unclear if the college and career readiness exam (schools can choose between ACT and SAT) in high school is reflective of the state academic standards and whether or not it is valid and reliable to measure ELA and mathematics performance. In addition, allowing schools to choose between the ACT or SAT clearly is not the “same indicator for all schools in all LEAs across the State.”</p>
<i>Strengths</i>	Including science as part of the accountability model is impressive. This

	<p>decision was based both on future career needs and recommendations from the assessment taskforce. (Note: Include science in Other Academic or School Quality or Student Success indicator.)</p>
<i>Weaknesses</i>	<p>OSDE is still debating how to calculate the academic achievement indicator.</p> <p>The academic achievement indicator can be disaggregated for each subgroup, but the calculation will only have students represented in one subgroup at a time, how the calculation will actually work is not clear as it appears to consider each subgroup separately in the calculation. This seems to misrepresent the performance of the subsequent subgroups (see pg. 68)</p> <p>The state has included science as part of the academic achievement indicator for high school. This should be in “Other Academic” or “School Quality or Student Success indicator”.</p> <p>OSDE does not discuss the requirement to measure the performance of at least 95% of all students and 95% of all students in each subgroup.</p> <p>OSDE does not discuss how the ACT and SAT – as the high school test for English language arts and mathematics will measure attainment of state academic standards on the annual statewide ELA and mathematics assessments.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (4 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>OSDE should:</p> <ol style="list-style-type: none"> 1) Provide the final methodology for calculating the academic achievement indicator so that it is consistent for all schools and all LEAs across the state. 2) In calculating and reporting the academic achievement indicator, assign students to <u>every</u> applicable subgroup to ensure that the grouping does not misrepresent the academic performance of <u>any</u> student subgroup. 3) Remove science from academic achievement indicator and include in Other Academic or School Quality or Student Success indicator. 4) Describe how the academic indicator measures the performance of at least 95 percent of all students and 95 percent of all students in each subgroup. 5) Describe how the ACT and SAT – as the high school test for English language arts and mathematics - will measure attainment of state academic standards on the annual statewide ELA and mathematics assessments.

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>	OSDE will use growth in ELA and mathematics in elementary and middle schools as another academic indicator. Each student receives a growth score which can be averaged across schools or districts. Growth will be measured using data from two grade levels (e.g. grades 3-4). A value table will be used to measure growth and each achievement level will be divided in half so that movement can be evaluated both within and across achievement levels. The footnote on pg. 69 references the Colorado Growth Model. Schools will be given credit for growth across the entire scale. Achievement levels will be divided in half which allows for giving credit to a school for moving a student from low to high in one year. This indicator can be disaggregated for each subgroup. OSDE will use science status in all schools as another academic indicator. Science exams are not administered every year, thus can only provide status measures (Appendix pg. 141). As a state assessment, grade level assessments are comparable.
<i>Strengths</i>	OSDE has developed an accountability system with multiple measures. Schools will be given credit for moving a student either by moving a student across levels or within a level. This ensures that the focus is growth and not simply moving from one level to another. Dividing the achievement levels into halves will provide more complete information to schools and the OSDE about student growth. Growth that looks at movement both within and across achievement levels will be incorporated.
<i>Weaknesses</i>	It is not clear what growth model will be used. How growth is calculated is necessary to determine if the method is valid and reliable. OSDE is exploring the options available to determine its growth model (Appendix pg. 104)
<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</i>	OSDE should identify the growth model being used, clarify the process for calculating growth, and ensure the method is valid and reliable.

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

A.4.iv.c: Graduation Rate

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSDE describes the four-year graduation rate as “the number of students who graduate in four years with a regular high school diploma divided by the number of students who form the adjusted cohort for that graduating class”. The same indicator will be used across all LEAs in the state. It is valid and reliable and is based on the SEA’s long-term goal to have a 90% graduation rate by 2025. The SEA believes that graduation is important no matter how long it takes. Therefore, the four-year adjusted graduation rate will be supplemented by students who will graduate in year five or six. However, the weight of those students will be less than those graduating in four years. The weight for five- and six-year rates is set at 0.85 and 0.50, respectively. The indicator can be disaggregated for each subgroup of students. Students with the most significant cognitive disabilities who participate in Oklahoma’s alternate assessment program based on alternate grade-level standards will be given full weight regardless of when they graduate. Also, OSDE will monitor the use of the six-year graduation rate to determine if it appears to be providing an incentive to delay graduation. If this is the case, OSDE will permit use of the six-year for only students with disabilities and students who qualify as English learners upon entering at a proficiency level that may preclude them from attaining proficiency to graduate with their cohort. (pp. 70-71)
<i>Strengths</i>	OSDE graduation policies address a wide variety of student needs and support

	<p>the state’s goal of ranking among the top 10 states with the highest graduation rate for students in four-, five-, and six-year cohorts.</p> <p>OSDE includes students with significant cognitive disabilities, weighting of five- and six-year cohort, and monitoring of use of six-year graduation rate.</p> <p>The method is valid and reliable based on the federal calculation with goal of 90% graduation rate for all students.</p>
<i>Weaknesses</i>	It is not clear how the 5th and 6th year graduates actually factor into the overall graduation rate.
<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>	OSDE should clarify (beyond weighting) how the 5 th year and 6 th year graduates will factor into the overall graduation rate indicator.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSDE’s long term goal is stated “to work toward yearly significant increases in the percentage of students achieving proficiency” as measured by WIDA ACCESS 2.0 - and “ceasing to require EL services within a maximum of five years.” While it is questionable if the state’s measurable goal of 2% gain each year in students on track to ELP is ambitious, the plan to set new specific, percentage-based long term and interim progress goals over the 2017/18 school year is multi-faceted and data driven. OSDE’s definition of ELP includes meeting proficiency on state assessments, successfully achieving in classrooms where the language of instruction is English, and being on track to meet college and career-ready standards (pg. 71-72).
<i>Strengths</i>	OSDE will convene an EL district stakeholder committee to set new cut scores for the new ELP WIDA screener and new ELP bands for the ELPA using ACCESS 2.0 baseline data from SY 2016-17. OSDE will also conduct a comparison study from EL performance on OSTP assessments and the ELPA to establish what ELP level EL scores correlate to scoring proficient on OSTP

	<p>assessments. This data will inform new EL exit criteria. The state has a strong definition of English language proficiency.</p> <p>The state will ensure long term and interim goals are ambitious through the review of data once available.</p>
<i>Weaknesses</i>	Data are not yet evaluated to establish the ELP measurements for the statewide accountability system.
<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>	Now that the 2017 ACCESS scores are available, OSDE should describe the state's Progress in Achieving English Language Proficiency indicator once it is developed. The indicator must be valid and reliable, aligned with identified timeline, and consistently measure statewide progress of all ELs.

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>OSDE identifies chronic absenteeism as its School Quality Indicator for all schools and defines it as missing 10% or more of the school year (missing 18 or more days of instruction). Research for support of this indicator is cited in a report from the Hamilton Project at the Brookings Institution. Chronic absenteeism is given 10 points on the 90 point A-F report card which allows for meaningful differentiation. All students enrolled for a full academic year will be included and OSDE will report for all students and by subgroup. The measurement (given accurate data input) is valid and reliable.</p> <p>For high schools, OSDE will also use Postsecondary Opportunities as a School Quality Indicator. Schools will receive credit for every student taking advanced coursework defined as AP classes, IB program, Dual enrollment, internship, and programs leading to industry certification. Initial implementation of this indicator will be on participation only with a shift to</p>

	crediting successful outcomes (i.e., minimum score on AP test) once more programs become available. (pg 73-74). Students participating in these courses range from 0% to 68% which allows for meaningful differentiation. OSDE will report by all students and by subgroup. The measurement (given accurate data input) is valid and reliable.
<i>Strengths</i>	<p>OSDE has developed an accountability system with multiple measures that are each valid and reliable.</p> <p>OSDE includes chronic absenteeism with research to support how it may help shift a school culture.</p> <p>A shift beyond just participation on the postsecondary indicator will also raise the bar for quality programs.</p> <p>OSDE has a nice balance between college and career opportunities in the postsecondary indicator.</p>
<i>Weaknesses</i>	<p>Consider including students who are not enrolled for the full academic year since these students are included in the state assessment system.</p> <p>Not exactly clear how the chronic absenteeism indicator will be calculated.</p> <p>OSDE recognizes AP classes regardless of whether the student passes the exam or not. Also, dual enrollment courses regardless of receiving course credit and industry certification regardless of actually receiving certification.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	OSDE should clarify how the chronic absenteeism indicator will be calculated for each school.

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>	OSDE's accountability system (for all schools including charters) is based on all indicators (ELA status, mathematics status, science status, ELA growth, Mathematics growth, graduation rate (including five- and six-year graduation rate in addition to the four-year graduation rate), EL progress, Postsecondary readiness (high schools) and Chronic absenteeism. It includes all students as

	<p>well as those in each student group and uses a scale score reflecting both student status and growth, which are then converted to grades. (pg. 75-76)</p> <p>The A-F grading system allows for meaningful differentiation both in calculations and in communications with stakeholders. The model is based on a 90 point scale (with 15 points removed if the school has fewer than 10 EL students). Disaggregated data on all indicators will be reported for all students and each subgroup. OSDE does not mention that the EL indicator is still under development “but is confident that the work will get done over the 17-18 school year.” Exactly how the State defines “meaningful differentiation” is not provided, but all student subgroups are represented.</p>
<i>Strengths</i>	<p>The new reporting system recognizes the value of multiple indicators.</p> <p>OSDE’s use of grades for each accountability indicator supports parent and community understanding.</p> <p>OSDE’s use of A-F letter grade with a separate scale for assigning letter grades if the ESL indicator is not possible will help with transparency for the public.</p>
<i>Weaknesses</i>	<p>How the State defines meaningful differentiation is not clear. Data were not provided based on prior assessments to at least give an indication that the process will lead to meaningful differentiation.</p> <p>Adjustments will need to be made based on data from new assessments and formulas.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (3 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (1 peer reviewer)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>OSDE should provide a description of the final system (including the final plan and data), once available, to ensure meaningful differentiation.</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>	<p>Figure 7 (pg. 77) describes the weighting of each indicator. For schools with fewer than 10 EL students, 15 points will be removed from the denominator. For elementary and middle schools, academic achievement (including science) and ELP comprise 80 of 90 points (89%). For high schools, academic achievement (including science), ELP, and graduation rate comprise 70 of 90</p>

	points (78%). Excluding science, elementary and middle schools academic indicators comprise 75 of 90 points (83%). Excluding science, high schools academic indicators comprise 55 of 90 points (61%). The state also indicates that an “A” school flagged for targeted support will have their grade lowered to a “B.” (pp 76-78)
<i>Strengths</i>	OSDE provides a clearly described weighting system.
<i>Weaknesses</i>	Science will need to shift from the Academic Achievement indicator to SQ/SS and both chronic absenteeism and postsecondary opportunity will need to be combined under SQ/SS in the high school level. However, after these shifts the SQ/SS is still only 15% in Grades 3-8 and 35% at high school, so federal requirements are still met.
<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.c: If Applicable, Different Methodology for Annual Meaningful Differentiation

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA listed three possible methods it might use to identify non-traditional schools such as pre k-2 schools, alternative schools serving entirely at-risk students and schools that do not meet the minimum number of students for comprehensive or targeted support and improvement. Schools only serving up to Grade 2 will incorporate the ESL indicator (if applicable), SQSS, and grade 3 performance for the feeder school. Schools serving at risk populations will have a higher weight focusing on graduation rate and chronic absenteeism in order to incentivize these behaviors, and schools with fewer than 10 students will aggregate back 3 years in order to meet minimum n-sizes (pg. 78). OSDE noted that it will consult with other states, national experts and local stakeholders to develop modifications to the accountability system for these schools.
<i>Strengths</i>	OSDE will be developing modifications to the accountability system for non-traditional schools. OSDE provides potential alternative accountability models under discussion and plans to meet with other states, national experts, and local stakeholders to develop future methodologies for very unique schools. Applying appropriate adjustments to the current model to meet the needs of

	diverse populations of schools.
<i>Weaknesses</i>	Although OSDE recognizes that modifications are needed to address unique populations of students, specific methodologies have not been selected.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Once developed, OSDE should submit its methodologies for annual meaningful differentiation for alternative schools for which an accountability determination cannot be made.

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>	<p>Oklahoma will identify schools as Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI) from among all schools in the state, not simply Title I, Part A eligible schools. At a minimum elementary and middle schools that earn an F on the Oklahoma A-F School Report Card will be categorized as comprehensive support schools. For high schools the same criteria apply, but graduation rates are also a consideration. Any high school with a graduation rate of 67% or lower will be identified as needing CSI. In the baseline year (2017- 18), the model will be calibrated so that approximately 5% of schools will receive an F and 5% will receive an A. As the majority of schools improve, the rubric will be adjusted. If fewer than 5% of schools receive an F, the schools in the lowest 5% of overall points for each model (e.g. high school, elementary and middle school) will be identified for comprehensive support. In the event that the aforementioned methodology results in less than 5% of Title I schools being designated as CSI, the OSDE will identify the accountability score at the fifth percentile of Title I schools and designate all schools below that score as CSI. CSI schools will first be identified in the 2018-2019 school year.</p> <p>(pg. 85-86)</p>
<i>Strengths</i>	All schools are included in the state’s accountability system and school improvement designation.

	OSDE is committed to supporting all schools receiving a CSI designation. Initial calibration such that at least 5% of schools receive the lowest grade of an F with a review every 3 years for potential adjustments.
<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>	OSDE will identify all public high schools in the state with four-year cohort graduation rates of 67% or lower for CSI. The first year the state will identify schools for CSI will be 2018-19. Any school with fewer than 10 students in the graduating class will use a 3 year aggregate to determine graduation rate. This will allow for some stabilization in calculations when n-sizes are so small. (p 86)
<i>Strengths</i>	For small schools, the state will use a three year average to account for volatility. OSDE is using a 3 year average for graduation classes less than 10 to account for volatility in graduation rates with very small populations.
<i>Weaknesses</i>	Although OSDE notes it will use five- and six- year cohort graduation rates, it did not include in its description how five- and six-year cohort graduation rates are included in the methodology.
<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</i>	OSDE must clarify whether the five- and six-year cohort graduation rates are included in identifying high schools as CSI, and if so, describe its methodology for inclusion.

this requirement

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>	Schools that receive a TSI designation for three consecutive years due to lack of improvement within the same subgroup and have not satisfied exit criteria will be considered chronically low performing and receive a CSI designation. However, OSDE does not clarify that such schools receive Title I, Part A funds. It is unclear if using “two or more indicators” will result in identifying “any school in which one or more of its subgroups of students is performing at or below the performance of the all students group.” The first year Oklahoma will identify schools for TSI will be 2019-20. The first year Oklahoma will designate chronically low performing schools as CSI is 2022-23 (pp 86-87).
<i>Strengths</i>	The state’s criteria would go beyond just Title I schools such that all schools meeting these criteria will be flagged for additional support.
<i>Weaknesses</i>	OSDE is using two indicators to identify schools for additional targeted support (instead of using any one indicator). Caution that identifying all schools (not just Title I) for CSI will likely require some State funding to support those non-Title I schools.
<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.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>	OSDE will identify CSI schools beginning in the 2018-19 school year. CSI schools will be identified every three years with the ability to exit yearly once

	exit criteria are met. If after 2020-21 it is identified that earlier review and supports are needed, a revision to the ESSA plan will be submitted. For schools failing to exit after 3 years, OSDE will review the level assistance needed (p 87).
<i>Strengths</i>	The OSDE timeline (figure 11, pg. 88-89) clearly depicts the state’s timeline for CSI and TSI designation. Since it is a new process based on new assessments, OSDE is factoring into the process a time for review and adjustment if necessary.
<i>Weaknesses</i>	Allowing schools to exit after only one year could lead to re-entry after no additional services provided if the increase or improvement was an anomaly and not sustainable.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSDE uses the same methodology to identify schools for targeted support as it does to identify the bottom 5% of schools - when at least one student subgroup is in the bottom 5% on two or more indicators in the accountability system. Ranking will be based on aggregate data from the most recent 3 years (pp 87-88). The SEA will first identify TSI schools for targeted support in 2019 and will re-designate annually. To identify schools that need Targeted Support and Improvement, Oklahoma will analyze school performance within each student group annually as required by the ESSA.
<i>Strengths</i>	The OSDE timeline (figure 11, pg. 88-89) clearly depicts the state’s timeline for CSI and TSI designation.
<i>Weaknesses</i>	OSDE is using two indicators to identify schools for additional targeted support (instead of using any one indicator). Using this model, it appears that if the Economically Disadvantaged subgroup is in the lowest 5% in ELA, but not mathematics or any other indicator, the school would not be identified for TSI. As the assessment is changing, it is not clear how will this impact the

	averaging across three years.
<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>	OSDE should clarify how using two or more indicators to identify a school as TSI will result in identifying “any school with one or more “consistently underperforming” subgroups of students” as required.

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>	OSDE uses the same methodology to identify schools for additional targeted support as it does to identify the bottom 5% of schools - when at least one student subgroup is in the bottom 5% on two or more indicators in the accountability system. The first year of designation will be 2019-20 and will occur by looking at data across three years, or, 3 consecutive years of low performance in the same 2 subgroups of students across at least two indicators. (p 88). OSDE states that “because this methodology requires a school to be in the bottom 5% for any two indicators as opposed to the bottom 5% overall, it is extremely unlikely that any school in which any student group, on its own, would lead to identification that would not already be identified using the previously described methodology,” but does not indicate if the methodology results in identification of such schools nor does the OSDE explicitly state the frequency of identification of such schools.
<i>Strengths</i>	The OSDE timeline (figure 11, pg. 88-89) clearly depicts the state’s timeline for CSI and TSI designation.
<i>Weaknesses</i>	OSDE is using two indicators to identify schools for additional targeted support (instead of using any one indicator). Using this model, it appears that if the Economically Disadvantaged subgroup is in the lowest 5% in ELA, but not mathematics or any other indicator, the school would not be identified for TSI. While it is unlikely that schools will be missed given the identification method described in the earlier section, this state should still complete an analysis to

	confirm all necessary schools have been identified.
<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>	OSDE should 1) describe that the methodology results in schools in which the performance of any subgroup on its own would lead to identification in the bottom 5% to confirm all necessary schools are identified for Targeted Support and 2) clarify whether the State will identify “schools from among all public schools in the State <u>or</u> from among only the schools identified as schools with one or more consistently underperforming subgroups” as required.

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>	OSDE plans to select the best-of-the-best “A” schools to receive a special recognition for excellence. OSDE intends to designate schools as reward schools if they have no large achievement gap, a participation rate above 95%, graduation rate of 85% with no student group falling below 75%. Because the first set of complete school grades will not be available until after the 2017-18 school year, a determination of how schools will be designated to receive this recognition cannot be made until a later time (p 89).
<i>Strengths</i>	OSDE is considering designating reward schools after reviewing and analyzing the first school reports and data collection after the 2017-18 school year. The “carrot” approach of additional recognition for top performing schools is incentivizing.
<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.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>	OSDE will factor participation into the school’s grade only if it falls below 95% for any student group. Any school with a participation rate below 95% for any student group will have a “minus (–)” placed after its letter grade. The participation rate will also be shown on the report card, with detailed data available by student group.” It appears as though OSDE combines participation in English/language arts and mathematics into one participation rate (see Figure 12). All students who are enrolled in grades 3-8 and 11 at the time of testing are required to participate. All high school students must take the college- and career ready assessment, as well as any enhancement items needed for science and U.S. history. Schools with very low n-sizes can petition the state if they missed the requirement due to the low n-size (i.e., only 11 students, and one student doesn’t test puts this school at 91% participation). (pp 89-90)
<i>Strengths</i>	Historically, Oklahoma has not had an issue with low participation rates.
<i>Weaknesses</i>	<p>A minus on the school report card grade does not differentiate between schools with a large or small rate (e.g. 92% vs. 70%) or the length of time the school has not met the 95% requirement.</p> <p>This does not differentiate a school that has a very low participation rate and a school with a very high one. The application of a “minus” doesn’t really account for the missing students from the accountability system. Nor does it address the potential need for services.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	As in A.4.iv.a, please describe how the state will ensure 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 are included in the statewide accountability system.

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

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

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

	<i>Peer Response</i>
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<i>Peer Analysis</i>	OSDE will allow CSI identified schools to exit when the total score is no longer in the bottom 5% of state schools (but not allow if the scores did not improve), and for high schools graduation rate must be 67% or higher OR the school has improved the performance of chronically low performing students groups to surpass a “similarly situated” student group in the state’s bottom 5% (any time during the 3-year designation). With just one year of improved performance, the plan does not necessarily ensure sustainability.
<i>Strengths</i>	A school will not exit CSI status if it is no longer in the bottom 5% but its score did not improve. CSI schools may exit CSI status at any time; thus motivating them to reach the required goals. The exit criteria aligns with long term goals.
<i>Weaknesses</i>	OSDE allows for exit if school meets exit criteria at any time within three years, and doesn’t require multiple years of success before exiting.
<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>	Annually, OSDE schools will be able to exit Targeted support if they show “substantial improvement.” This is defined as either having a greater performance in year 4 than in either the prior year, or the composite average of the three prior years. This improvement must be enough to bring the school out of the bottom 5% for the particular subgroup. “Substantial improvement” will be further defined once the state has multiple years of data under the new accountability model to confirm a rate “that is both statistically significant and meaningful.” (p 91)
<i>Strengths</i>	OSDE will look at multiple years of data to determine exit status.

	<p>By allowing schools to exit TSI on an annual basis, schools are motivated to reach this goal and get out from under the cloud of the TSI designation.</p> <p>This allows for not only a comparison of year 4 with prior year, but with the average of the prior 3 years which will help with stability.</p>
<i>Weaknesses</i>	<p>With just one year of improved performance, the plan does not necessarily ensure sustainability.</p> <p>OSDE has not determined the threshold for substantial achievement.</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.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>OSDE will require more rigorous actions for CSI school that fail to meet the states exit criteria after 3 years by implementing a gradual loss of local control. The types of interventions provided by the SEA will be determined by the specific needs of the identified school. Possible interventions include Implementation of state-approved supplemental, evidence-based supports and resources, required professional development based on the needs assessment completed by the OSDE CSI team, required participation in instructional leadership development training to build capacity in curriculum/instruction; classroom evaluation/assessment; school culture; student, family and community engagement; collaborative leadership; organizational structures and resources; and comprehensive and effective planning, participation in a Networked Improvement Community (NIC); mandatory five-day school week equaling a minimum of 170 days (if the school’s current calendar is shorter at the time of designation), implementation of a high-quality supplemental child nutrition program, amplification of the effective school librarian role to provide personalized learning environments, equitable access to resources, instructional leadership and current digital and print materials. The described interventions do not include changes in school staffing but do address the increase of 4-day school weeks to address budget concerns. OSDE indicates that “after a comprehensive review of a school’s needs, the OSDE may require many of the strategies that were optional during the first three years of</p>

	designation (pp 91-96).
<i>Strengths</i>	<p>OSDE provides a variety of research-based interventions and ensures that the interventions will be selected based on the needs assessment completed by the OSDE CSI team.</p> <p>Interventions will be based on individual school needs rather than a one-size fits all approach.</p> <p>Suggested interventions are research based and child centered, based on the needs assessment of the school, the potential for success is increased.</p>
<i>Weaknesses</i>	OSDE does not describe possible changes it may require to school staffing.
<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>	OSDE will use a combination of formula funding and competitive grants to support CSI and TSI schools. Depending on the number of identified sites, the state has developed a possible allocation model where 90 sites each receive \$50,000 which would leave \$200,000 in the state's 7% set aside to allocate through a competitive grant (pg.96-97). The allocation model and grant requirements are described, but the state does not include a description of how it will periodically review the resource allocation to sites serving a significant number or percentage of schools identified for CSI or TSI support.
<i>Strengths</i>	The amount of funds a school receives will be partially based on the number of students a school has enrolled. This is an equitable way of distributing the funds.
<i>Weaknesses</i>	<p>OSDE does not describe how it will periodically review the resource allocation to sites serving a significant number or percentage of schools identified for CSI or TSI support.</p> <p>Funding for all schools, even those not Title I depletes the amount available, especially when using an n-size of 10 which will inevitably identify even more schools for targeted and comprehensive support.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the</i>	OSDE should describe how it will periodically review the resource allocation

<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	to sites serving a significant number or percentage of schools identified for CSI or TSI support.
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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>	OSDE will provide technical assistance to all CSI and TSI schools based on the school support plan. The OSDE will work collaboratively with the site to implement the identified interventions, will provide ongoing progress monitoring and assessment including data collection and review and will ensure school improvement funds are spent appropriately and aligned with goals.
<i>Strengths</i>	The technical assistance will be differentiated based on the school's Comprehensive Needs Assessment. OSDE includes individual, school based goals and interventions.
<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.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>	Due to the implementation of a new model and assessment system, the state has not yet determined if additional improvement will be necessary for its schools. Decisions will be based upon a review of data and revised plans will

	be submitted if necessary. (p 98)
<i>Strengths</i>	OSDE will rely on data to determine if additional interventions are necessary and may submit a revised plan. The use of data to determine what, and how to address additional improvement if necessary.
<i>Weaknesses</i>	
<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>	Describe the actions the State will take if a significant number of schools in a single LEA fail to exit status.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSDE’s vision is that all students will have equitable access to effective educators. The state intends to develop effective teachers through a risk assessment, attempting to prevent teachers from becoming ineffective. The indicators are being developed. In addition, the teacher evaluation plan emphasizes professional growth. OSDE consulted a variety of stakeholders in developing the definition of an ineffective teacher and in developing the risk analysis approach. The 2015-16 calculation of disproportionate rates of access to ineffective, out of field, or inexperienced teachers are provided in Appendix 13 (pg. 263). The state’s definitions for these indicators are described in Figure 15. The data shows an 8.74% difference in the rates of low income

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

	students and a 9.29% difference in the rates of minority students taught by inexperienced teachers. OSDE states that it will publicly report progress toward equitable access to effective educators and annual calculations of disproportionate rates of access, but does not describe the measures it will use to evaluate and publicly report its progress related to how low-income and minority children are served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers. (p. 104)
<i>Strengths</i>	Individual risk analysis of each teacher to address needs and potential ineffective teachers before impacting kids negatively.
<i>Weaknesses</i>	OSDE does not address how it will or is addressing the issue of high poverty and minority students taught at disproportionate rates by inexperienced teachers. OSDE does not describe the measures it will use to evaluate and publicly report its progress related to how low-income and minority children are served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The state should describe the measures that it will use to evaluate and publicly report its progress with respect to how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSDE outlines six strategies in the 8-Year Strategic Plan to support a positive school climate from PreK to higher education. Training and support is provided to counselors, administrators, teachers, and other staff members across the state in mental health, sexual assault, drugs and alcohol in schools and bullying . The OSDE partners with a variety of agencies to support and serve children’s social service needs. OSDE provides the OK Prevention Needs Assessment tool to every school. Every school is required to have and follow an anti-bullying policy. Reports are required and an on-line reporting form for bullying reports is available. In addition, the School Safety and Bullying Prevention act of 2002 was updated in 2013. Every school is required to establish a safe school committee. OSDE assists LEAs with discipline policies that combat the loss of instructional time including requiring a higher

	standard of record keeping and intervention before a student in elementary school is expelled and developing discipline policies and practices that take into account individual needs. OSDE supports LEAs in reducing the use of aversive behavioral interventions through the OK Tiered Intervention System of Support - a multitier system of support to address not only academic needs, but behavioral and socio-emotional needs too (pg. 104-110).
<i>Strengths</i>	OSDE focuses on positive behavior supports while also ensuring laws, guidelines, and supports are in place to ensure safe learning environments. An individualized approach with a focus on academics and all possible ways a student's success could potentially be hampered. The inclusion of student/educator/parent needs assessments as well as the necessary PD and resources towards addressing those needs as well as continued review of results and impact of interventions and adjustments as necessary keeps the focus on student success.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input 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>	OSDE's strategic plan has a focus of closing the achievement gap and individualized learning for all students which thus addresses how the state will support transitions of students. The state has a strong pre-K program and support for early learning activities to better ensure school readiness and has adopted early learning standards to ensure the same expectations for all students when starting school. In addition, the state dept of ed assists LEAs with appropriate assessment and monitoring activities to ensure student success from pre-K through grade 3. With regards to middle school transitions, in addition to multiple resources, the state uses Individual Career Academic Plans, a multi-year to guide students "as they explore career, academic, and postsecondary opportunities." ICAP is a process that allows students to shift and change direction based on individual interests and growth. Students are required to begin the process in 9th grade, but the state goal is for students to start the process in 6th grade, thus reducing transition issues from grade to grade, especially middle to high school. The other purpose of

	<p>instituting ICAP is postsecondary and career planning. With the intent to ensure students understand the necessary pathways and course requirements for future endeavors, whether higher education or postsecondary training. The state is also investing in redefining the senior year such that students may be required to take additional mathematics to reduce the need for remediation in college, place focus efforts on credit recovery and drop-out prevention, and provide opportunities for apprenticeships, internships, and mentorships. To further encourage higher education, the state requires each school to administer the SAT or ACT to all 11th grade students at the school during the school day. Students in Grades 11 and 12 are also encouraged to take “concurrent enrollment” or “dual credit” courses in order to earn college credit at either a reduced or free tuition. The state legislature instituted the AP incentive program resulting in more students having access to AP courses and college tuition savings. The Promise State Scholarship Program provide college scholarships for students of families earning \$55,000 or less a year. The New Skills for Youth Initiative “aligns education and training to produce a relevant workforce” for the state (pg. 110-120).</p>
<i>Strengths</i>	<p>OSDE recognizes the need to keep middle and high school students engaged and motivated.</p> <p>Multiple and individualized approaches towards meeting the needs of students and their families throughout pre-K -12 and beyond are available.</p>
<i>Weaknesses</i>	<p>It is not made clear that these strategies have reduced the risk of students dropping out. OSDE’s role is unclear, unless the role is from a policy perspective.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (4 peer reviewers)</p> <p><input type="checkbox"/> No (0 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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>	OSDE uses a Home Language Survey for all students enrolled and it identifies

	<p>students who need additional testing to determine if services are necessary, but will also take teacher recommendation should a student need arise. WIDA is used for placement purposes in grades 2-12 and is administered within 30 days from enrollment at the beginning of the school year, and within 15 days if enrolling within the school year. This state uses PKST for pre-K and W-APT for Kindergarten and 1st grade placement testing respectively. Exit procedures are not possible for pre-K, but for students in Kindergarten, students may exit if they test as proficient in all 4 language domains of the Access assessment. Students in grades 1-12 may exit if students score at or above proficiency level on ACCESS. New proficiency bands will be set by committee in 2017-18. Students with severe-cognitive disabilities will be administered an Alternate ACCESS assessment in 2017-18 proficiency bands will be determined following that administration. Students who have exited services will be monitored for 4 years, or until HS graduation. Monitoring will consist of communication from the LEA with the parents, teachers, and students to ensure academic progress continues. Monitored students who do not score as proficient on state level content assessments will be able to access accommodations for testing during the first two years after being exited and may be eligible for reclassification of needing services (pg. 159-166).</p>
<i>Strengths</i>	<p>OSDE has a well thought through plan for updating ELP assessments.</p> <p>OSDE description includes an Alternate ACCESS for exit criteria.</p> <p>Individualized approach to ensuring language proficiency needs are being met. Continued access to accommodations for content testing during first two years after being exited helps to align research of 5-7 years for language acquisition with ambitious goal of exiting within 5 years.</p>
<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>	

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>	OSDE supports LEAs with identification, placement and professional development for ELP assessment through WIDA. OSDE intends to enhance the capacity to provide EL instructional support to teachers by offering content

	area instructional resources, directly assisting classroom teachers in adopting best practices, helping EL teachers understand the state’s content standards, and connecting ELs to career pathways. Due to the new WIDA 2.0 ELP assessment, OSDE is not able to establish measurements of interim progress on its ELPA until 2017-18. The state has set a 90% four-year graduation rate goal for all students by 2025 – with EL students currently at the lowest graduation rate in the state. The state hosts an annual EL Academy providing instructional strategies for all teachers on working with EL students and indirectly supports EL teachers through EngageOK Summer Conference and Joint Federal Programs Summit. In 2016, the University of Central Oklahoma was awarded a five-year \$2.5 million grant to provide professional development for Oklahoma City–area educators of English learners (pp 167-171).
<i>Strengths</i>	PD and resources available to assist LEAs and staff on how to best meet the needs of students.
<i>Weaknesses</i>	Plan is not fully established since cut scores have not yet been established.
<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 subgrant in helping English learners achieve English language proficiency?
- Does the SEA describe the steps it will take to further assist eligible entities if the strategies funded under Title III, Part A are not effective, such as by providing technical assistance and support on how to modify such strategies?

	<i>Peer Response</i>
<i>Peer Analysis</i>	OSDE will monitor TSI and CSI schools. Both TSI and CSI schools will be required to complete a comprehensive needs assessment. TSI schools will be required to identify evidence-based strategies and interventions focused on the needs of the lowest performing English learners. If EL performance is identified as a factor in CSI designation, a percentage of the supplemental assistance money should be used to implement an intervention targeted at EL growth. CSI schools are provided specific growth targets which will be monitored by OSDE. The state does not mention monitoring and technical assistance for schools other than TSI and CSI.
<i>Strengths</i>	Additional resources and monitoring and assistance provided if not exiting after one year.
<i>Weaknesses</i>	OSDE’s plan does not address how it will monitor the progress of each eligible entity receiving Title III funds, but limits the response to only TSI and CSI schools which will only address the lowest 5%.

<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>	OSDE needs to 1) describe how it will monitor the progress of each eligible entity receiving Title III funds in helping English learners achieve English language proficiency; and 2) describe the steps it will take to further assist eligible entities if the strategies funded under Title III, Part A are not effective.