

# STATE PLAN PEER REVIEW CRITERIA Peer Review Notes Template

---

STATE: Rhode Island



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

	<i>Peer Response</i>
<i>Peer Analysis</i>	Not applicable.
<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

- 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?

---

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>RIDE provides a definition of languages present to a significant extent as “a language group comprising five percent or more of the total tested population.” <b>P10</b></p> <p>Spanish is identified based on the definition citing 6.6 percent of students (9,353) in [undefined year]. The next most common language Creoles &amp; Pidgins, Portuguese-based are not identified and comprised 0.4 percent of students (508).</p> <p>RIDE’s determination of languages present to a significant extent does NOT take special consideration of students’ birth country, Native American status, or migratory status.</p> <p>RIDE’s definition of languages present to a significant extent cites a statewide analysis; there is no evidence RIDE makes additional supports available in districts or grades where more than five percent of students speak a common language other than English. <b>P10</b></p> <p>RIDE provides a table on p. 10 of its plan that identifies 9 home languages for the greatest number of students, which makes clear that Spanish is the only language other than English present to a sufficient degree (6.6%) to meet the definition of “present to a significant extent.”</p>
<i>Strengths</i>	<p>RIDE has defined “significant extent” as 5 percent based on the U.S. Department of Health and Human Service’s guidance of populations to include for persons who are limited English proficient. Statistics are clear regarding languages present to a significant extent at the state level.</p> <p>Spanish is specifically identified in the definition as the most populous language other than English.</p>
<i>Weaknesses</i>	<p>RIDE does not delineate the dominant languages by district or by grade spans. Although less than five percent of students may share a dominant language other than English statewide, select districts of grades may enroll higher proportions of students who could benefit from language accommodations other than Spanish. <b>P10</b></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</i>	While RIDE addresses the most populous language statewide, it must describe

<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	how it considered the dominant languages by LEA and grade span.
--	---

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>	State assessments are available in English only for English language arts PARCC, science, PSAT and SAT, and alternate assessments. Math PARCC is available in Spanish for all grades, 3-8 and 11. <b>P10</b>  RIDE provides accessibility and additional accommodations for EL learners including extended time, general administration directions in the student's native language (languages not specified), and use of a word-to-word dictionary (languages not specified). <b>P11</b>
<i>Strengths</i>	RIDE has mechanisms in place to assist Spanish-speaking English learners. Additional supports are available for English Learners on other assessments but languages were not specified for which these additional supports are provided.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.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>	Rhode Island recognizes that few of its assessments, including the State science and English language arts assessment, the SAT, and PSAT are offered in Spanish. Furthermore, the State does not offer alternate assessments in Spanish. However, it reports offering English learners accommodations including extended time and instructions in their native languages (page 11).  RIDE does not identify any additional languages where assessment translations are needed.

	<p>RIDE will be transitioning to a new assessment system, Rhode Island Comprehensive Assessment System (RICAS), in 2017-18 that will include PSAT and SAT at HS and plans to have math translations available in Spanish. <b>P11</b></p> <p>RIDE plans to provide Spanish translations for the new science assessment in Spring 2019. <b>P11</b></p> <p>RIDE is committed to working with the College Board to enable the development of Spanish translations for PSAT and SAT. <b>P11</b></p> <p>RIDE is also transitioning to new alternate assessments: Dynamic Learning Map (DLM) for math, ELA, and science in Spring 2018. While DLM does not provide translated assessments, language translation is an allowable accommodation for ELs. <b>P11</b></p>
<i>Strengths</i>	<p>RIDE is developing assessments in Spanish for science and exploring other languages for translations.</p> <p>RIDE has multiple mechanisms in place to assist English learners (word-to-word dictionary, general administration directions); but does not specify for which languages they are available.</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.3.iv: Efforts to Develop Assessments

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

student population include an explanation of the reasons (e.g., legal barriers) the State has not been able to complete the development of such assessments despite making every effort?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Rhode Island offers few assessments in non-English languages. However, the State is moving forward to expand assessment coverage in Spanish in mathematics and science.</p> <p>RIDE enlisted a committee of practitioners including parents, educators, experts and other organizations to discuss the need to have additional language translations and solicited feedback via online surveys, public forums and targeted meetings. This resulted in general interest to expand translations into additional languages. RIDE will continue to evaluate if additional language translations are appropriate. <b>P11</b></p> <p>RIDE provides a timeline to develop assessments in Spanish by Spring 2018 for the new assessments in math and as an accommodation for alternate assessment (DLM) and for the new science assessment by Spring 2019. <b>P11</b></p> <p>RIDE also commits to work with the College Board to develop language translation for PSAT and SAT, but does not provide a timeline. <b>P11</b></p> <p>RIDE does not describe if or how assessments in languages other than Spanish would be developed but interest was expressed in developing additional translations. The state will monitor the student population to determine if additional translations are warranted. <b>P11</b></p>
<i>Strengths</i>	<p>Rhode Island discussed the development of additional assessments in non-English languages with a broad range of stakeholders and remains open to revisiting the issue.</p> <p>The available translations are specifically focused on Spanish, the State’s most populous language.</p> <p>There are processes in place to meet the assessment needs of the English learner population.</p>
<i>Weaknesses</i>	<p>RIDE does not provide any detail to clarify whether the translation accommodation will only be provided to students whose home language is Spanish, or to all English learners. While a new partner among DLM states, there are several policies/practices that govern that assessment (essentially that for mathematics and science, and for directions and other aspects of the ELA assessment that do not inadvertently cue or otherwise confound the ability to measure the intended construct, trained test administrators are free to translate in the language of instruction/the language customarily used according to a student’s IEP).</p> <p>The plan and timeline for a Spanish version of the mathematics portion of the PSAT and SAT is not fully developed.</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</i>	



<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	
--	--

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	Rhode Island is using its historical racial and ethnic groups for its subgroup classification, which will provide consistency in accountability reporting across schools and overtime. The racial/ethnic subgroups are: American Indian or Alaska Native; Asian; Black or African American; Hispanic or Latino; Native Hawaiian or other Pacific Islander; two or more races and White (p.13). RIDE’s annual report cards will provide performance data on additional subgroups: students experiencing homelessness, those in foster care, those in the juvenile justice system, and those who are military dependents (p. 14).
<i>Strengths</i>	RIDE’s annual report cards will provide performance data on additional subgroups: students experiencing homelessness, those in foster care, those in the juvenile justice system, and those who are military dependents( p14).
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	RIDE noted that this requirement was non-applicable, but it is adding students in the juvenile justice system.
<i>Strengths</i>	Although not required for accountability purposes, the annual report cards will provide performance data on additional subgroups: students experiencing

	homelessness, those in foster care, those in the juvenile justice system, and those who are military dependents. Particularly given the greater transience of military dependents, a means of tracking their performance is commendable.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

*Note: This peer review criterion applies only if a State selects the third option in item A.4.i.d in the consolidated State plan template for recently arrived English learners under which the State applies the exception under ESEA section 1111(b)(3)(A)(i) or the exception under ESEA section 1111(b)(3)(A)(ii) to a recently arrived English learner.*

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<b>Not applicable.</b> RIDE is applying the exception under ESEA section 1111(b)(3)(A)(i) to a recently arrived English learner (P14).  Recently arrived ELs in Rhode Island will be excluded from one administration of the ELA state assessment and will exclude results on any of the assessments for the first year of the English learner’s enrollment for the purposes of the state determined school accountability.
<i>Strengths</i>	
<i>Weaknesses</i>	RIDE will not have baseline data for ELs on the ELA state assessment and therefore will not be able to include these students in learning gains, only achievement, in the second year in the United States. Learning gains will not be included until the EL’s third year in the United States.
<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</i>	

*this requirement*

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	Rhode Island selected a minimum N-size of 20 for its accountability system and will apply it uniformly to all schools and subgroups. A minimum N-size of 20 should uphold the spirit of transparency and accountability.
<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.ii.b: Statistical Soundness of Minimum N-Size (ESEA section 1111(c)(3)(A)(i))

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	RIDE's selected minimum N-size statistical soundness is rationalized as previously used for many years in RIDE, simply stating that it is statistically sound, and that reliability and representativeness were optimal based on analyzing reliability data. However, data supporting these claims were not

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

	provided, nor was any research cited ( P.15).
<i>Strengths</i>	Rhode Island presented an argument on why it selected a minimum N-size of 20 for its accountability system. Referencing historical data, the State settled on this number to balance reliability and yield large enough student counts to select schools and subgroups for meaningful interventions.
<i>Weaknesses</i>	<p>Rhode Island did not provide an analysis of how many students and schools would be excluded from the accountability system with an N-size of 20.</p> <p>The narrative cites research and an analysis of the data, but there was no discussion of how or what statistical principles were applied when making the decision for the minimum N-size of 20 nor did it provide evidence that an N-size of 20 is statistically sound relative to RIDE’s chosen indicators.</p> <p>RIDE could use, and reference, the best practices established by the Institute of Education Sciences congressionally mandated report “Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information,” published in January 2017 to guide and support the decision process in selecting the minimum N-size. RIDE should provide context from its own data analysis or reliability and representativeness.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	RIDE should provide detail on how the research relates to RIDE’s decision for a minimum N-size of 20, provide documentation on the statistical soundness of this N-size as it relates to the accountability indicators, and how (or an analysis of) other minimum N-sizes that were considered but resulted in the selection of 20.

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>	<p>Rhode Island presented an argument on why it selected a minimum N-size of 20 for its accountability system. Using historical data, the State settled on this number to balance reliability and the adequate representation of students in the accountability system to select schools and subgroups for meaningful interventions.</p> <p>However, RIDE provides no data to support the selection of this N-size in the plan narrative. While data may have been collected, analyzed, and provided to stakeholders to support the discussion and selection of this N-size in, there is no indication in the narrative to this effect. In fact, some stakeholders had suggested an N-size of 5, but RIDE determined that 20 was needed to maintain year-to-year reliability but provided no supporting data as to why (P15).</p>

	<p>In addition to research and prior use rationale for statistical soundness, the minimum N-size was also discussed at stakeholder meetings (which stakeholders were not specified) (P15).</p> <p>Sharing results of the reference analysis for reliability and representativeness would help confirm the minimum N size of 20 is the best decision for inclusion, validity, and reliability.</p>
<i>Strengths</i>	<p>Stakeholders were involved in the discussion of the minimum N-size.</p> <p>The minimum N-size is low enough to be inclusive and not personally identifiable.</p>
<i>Weaknesses</i>	<p>RIDE did not present data or analysis in the narrative that shows how stakeholders arrived at the decision to select 20 as the minimum N-size.</p> <p>RIDE did not provide a description of the process used to determine the minimum number of students for which accountability data would be disaggregated.</p> <p>RIDE did not provide a description of collaboration efforts/strategies to engage such as stakeholder groups as parents, teachers, and instructional leaders.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>RIDE must provide documentation as to how this decision was made to have an N-size of 20 and why the stakeholders' proposed N-size of 5 was not used; i.e. data/technical analysis, research/literature, meetings notes, stakeholder feedback, etc.</p>

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?<sup>3</sup>

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>RIDE identifies its policy on minimum N-size for reporting data, elaborating upon the requirement of at least ten students by also including situations in which 100% of students performed at the same level. In either of these instances, RIDE indicates that data must be suppressed to ensure confidentiality of individual student results.</p>

---

<sup>3</sup> See footnote 5 above for further guidance.

	However, the State’s response does not include a description of how either of these decision rules ensures that the privacy of individual students will be protected, although that may be inferred from the information provided.
<i>Strengths</i>	RIDE has additional anonymity rules to not report measures with 100%.
<i>Weaknesses</i>	RIDE does not provide a response to how the minimum N-size of 20 will preserve student anonymity. The response consists only of the “what” the policy is but lacks the essential “how” it will protect individual student privacy.  RIDE should consider adding anonymity to the measures with 0% as it reveals the same information as 100% reveals.
<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>	RIDE must provide a response on how the minimum N-size of 20 will preserve student anonymity.  RIDE should consider adding anonymity to the measures with 0% as it reveals the same information as 100% reveals for which there is already a rule.

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>	Rhode Island’s minimum number of students for reporting is 10 or greater students which is different from the minimum of 20 for the accountability system. However the State does not discuss the statistical reliability of N-size of 10 or above for reporting. The selection of the N-size of 20 for the accountability system was partly due to add stability to the data reporting. <b>P16</b>  Values of 100% are suppressed.
<i>Strengths</i>	RIDE’s procedures are based on established practice.
<i>Weaknesses</i>	RIDE indicates that it arrived at statistical reliability for the accountability system as an N-size of 20 or above, but does not discuss the issue with the reporting N of greater than 10.  RIDE does not focus on student privacy or provide specific evidence of statistical reliability.
<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</i>	RIDE must explain how the minimum N-size of 10 is statistically sound and does not provide identifiable information.

<p><i>an SEA must provide to fully meet this requirement</i></p>	<p>RIDE should consider adding anonymity to the measures with 0% as it reveals the same information as 100% reveals for which there is already a rule.</p> <p>RIDE could use and reference the best practices established by the Institute of Education Sciences congressionally mandated report “Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information,” published in January 2017 to guide and support the decision process in selecting the minimum N-size for reporting.</p>
--	--

**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>	<p>RIDE provides two sets of conflicting long-term goals: one in the narrative (P16) and one in Appendix A (P82). RIDE needs to remedy this inconsistency by either revising the goals or the subgroup timelines, RIDE provides the timeline specifying 75% proficient on ELA and math state assessments in 2025 as the year in which long-term academic achievement goals are to be met; regrettably, this goal is only for all students. The timeline for 75% proficient in ELA and math varies by subgroup and does not appear to meet the same multi-year length of time requirement. The timelines for subgroups to meet the 75% proficiency goal range from 2024 to 203 . P20</p> <p>RIDE acknowledges that these goals will require larger annual gains than it has realized in the past, but is setting high expectations for all students that are clearly articulated in the Strategic Plan and investing in major reforms to improve student outcomes. <b>P16</b></p> <p>Baseline data are provided for the long-term academic achievement goals 2016 spring test results, but RIDE proposes to reevaluate the goals based on the new assessment administered in 2017-18. <b>P17</b></p> <p>Baseline data is provided for each subgroup for ELA and Math only in Appendix A. <b>P 82-84</b></p> <p>RIDE’s plan states that it will require an annual percentage decrease in the gap</p>

	<p>to get to 75% proficiency which will result in larger improvements needed by groups that are further behind. It is unclear how the state plans to divide the decreases over the years or determined how much decrease is needed given the 75% goal occurs in different years for different subgroups. <b>P17</b></p> <p>To demonstrate the timeline is the same for all subgroups, RIDE must explain how it set the end year for the long-term academic achievement goals for each subgroup. <b>P82-84</b></p> <p>Long-term academic achievement goals seem ambitious based on the charts in Appendix A, and possibly too ambitious given the statement that the pace far exceeds previous reality.</p>
<i>Strengths</i>	<p>Long-term academic achievement goals in terms of percent proficient on ELA and math state assessments are easily understood.</p> <p>English language arts and math are computed separately.</p> <p>RIDE considered gains in proficiency on previous state assessments and on NAEP as one means of evaluating the feasibility of the long-term goal identified in this section. This action contributes to the perception that the goal that has been set is indeed an ambitious one.</p>
<i>Weaknesses</i>	<p>While Rhode Island has set a common goal of 75% proficiency for <b>all</b> students, it is allowing more time for subgroups to meet the proficiency standard (pages 18, 19, 82, and 83). For example, only two of the ten subgroups would meet the 75 percent target by 2025 in English language arts and mathematics. Students with disabilities would not meet the standard in English language arts until 2028 and mathematics until 2027.</p> <p>RIDE did not explicitly identify and describe long-term goals for subgroups of students to have different/same multi-year length of time to meet the 75% proficient on ELA and math state 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>RIDE must provide long-term academic achievement goals over the same multi-year length of time for all students and each subgroup.</p> <p>RIDE must explain how the long-term academic achievement goals end year was set for each subgroup and overall to demonstrate the timeline is the same for all subgroups.</p> <p>RIDE should provide a timeline and explanation of how the long-term academic achievement goals will be reviewed and revised using the results of the new 2017-18 state assessments.</p> <p>RIDE should provide a year to accompany the Baseline header in the charts in the Appendix A P82-83 as it is unclear whether the data represents 2016 or 2017 performance.</p>

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



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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>RIDE has set interim goals in mathematics and English language arts to meet the long-term 75 percent proficiency for all students by 2025 However, RIDE provides interim academic achievement goals in Appendix A that are set annually but differ by subgroup (<b>P17</b>), have greater increases required in earlier years than later years, have a 2025 goal of 64-79 in ELA and 69-80 in mathematics, and do not project past 75+ percent proficient long-term goal <b>P82-83</b></p> <p>Interim goals do not culminate with the long-term goal of 75 percent proficient by 2025 for all subgroups. <b>P82-83</b></p> <p>While intended measures of interim progress address the need to narrow current gaps in proficiency rates by varying the degree of improvement needed, the evident discrepancy in long term goals among student subgroups and all students needs to be clarified.</p> <p>Peers recommend the following to improve this section: RIDE should provide an explanation for why there are greater increases required in earlier years than later years, have a 2025 goal of 64-79 in ELA and 69-80 in mathematics, and do not project past 75+ percent proficient.</p> <p>RIDE should provide a year to accompany the Baseline header in the charts in the Appendix A <b>P82-83</b> as it is unclear whether the data represents 2016 or 2017 performance</p> <p>RIDE should explain how interim goals will be established when 2017-18 data are available. RIDE should provide a plan and timeline to the Department on the when new baseline and goals will be available.</p>
<i>Strengths</i>	<p>In Appendix A, Rhode Island clearly displays the interim goals by assessment, by year, and by subgroup.</p> <p>Interim academic achievement goals are presented in terms of percent proficient on ELA and math state assessments, which are easily understood.</p> <p>Goals are set annually.</p> <p>ELA and math are computed separately.</p>
<i>Weaknesses</i>	<p>While Rhode Island has set a goal of 75% proficiency for <b>all</b> students, it is allowing more time for subgroups to meet the proficiency standard (pages 18, 19, 82, and 83).</p> <p>RIDE does not explain why interim goals have greater increases required in earlier years than later years, have a 2025 goal of 64-79 in ELA and 69-80 in 2025, and do not project past 75+ percent proficient.</p>

<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	RIDE must provide an explanation on why the interim goals do not culminate with the long-term goal of 75 percent proficient by 2025 for all subgroups.

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>RIDE requires greater improvement for subgroups that are further behind.  <b>P18, 82-83</b></p> <p>Given the simplicity of the calculation, it is likely that significant progress in closing statewide proficiency gaps will occur because the measure is transparent and annually measured.</p> <p>RIDE provides baseline proficiency rates which show the extent or the achievement gaps and which subgroups require greater improvements to close proficiency gaps.</p>
<i>Strengths</i>	<p>RIDE has set one long-term goal at 75 percent proficiency by 2025. Therefore, lower performing subgroups will need to make larger annual gains than their higher performing peers. The State discusses this issue and presents the trajectory for meeting long-term goals for each subgroup. Data provided by the State indicate that students with disabilities and English learners will have the steepest path to progress in English language arts given that these students were less than 20 percent proficient in 2016. In mathematics, all subgroups with the exception of Asian and White students will need to make substantial annual progress given that less than 30 percent of the remaining subgroups were proficient in 2016. P19</p> <p>RIDE has engaged broad stakeholder groups on setting interim and long-term goals, ensuring support across the system.</p> <p>Gaps are easily measured and understood using grade level proficiency rates.</p> <p>English language arts and mathematics are measured separately.</p>
<i>Weaknesses</i>	The long-term goal of 75% students at or above proficient by 2025 only applies to all students as a whole, but not to all subgroups.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information</i>	

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>RIDE presented two contradictory sets of long-term graduation rate goals. In the narrative on (page 20) RIDE indicates that 95 percent of all students will graduate by 2025. Data presented in Appendix A for subgroups indicates varied timelines ranging from 2021 to 2031 for subgroups to reach the 95 percent goal. In 2025 the target graduation rate for subgroups ranges from 89 to 96. percent (P84 and P85). RIDE must resolve this inconsistency.</p> <p>RIDE based the long-term graduation goals on improvements from 2008 to 2015, during which time RIDE experienced a nine-percentage point increase in the graduation rate. RIDE is projecting a 9-percentage point increase from the 2016 baseline of 86% to 95% in 2025 for all students. RIDE describes this as a stretch in the narrative, but this is only a difference of one percentage point over the previous nine-year time span. <b>P20</b></p> <p>Baseline data for the long-term graduation rate goals is 2016 at 85%, but Appendix A has the baseline listed as 86%. RIDE should provide clarification on the baseline year and which value is used as the baseline. <b>P20, 84</b></p> <p>The plan states that it will require an annual percentage increases to get to 95% graduation rate, which will result in larger improvements, needed by groups that are further behind. It is unclear how the state plans to divide the increases over the years or determined how much increase is needed given the 95% goal occurs in different years for different subgroups. <b>P84-85</b></p> <p>To demonstrate the timeline is the same for all subgroups, RIDE must explain how the interim goals were set for each subgroup given the different improvement rate requirements. <b>P84-85</b></p> <p>Peers also recommend the following to improve the plan: RIDE should provide a year to accompany the Baseline header in the charts in the Appendix A, P84, as it is unclear whether the data represents 2016 or 2017 performance. Especially with the reference in the narrative is to 2016 as 85%</p>

	graduation rate and in the chart, it lists 86%.
<i>Strengths</i>	RIDE is using a four-year adjusted cohort rate and applying it to all students and subgroups; improvement is expected of all groups.  RIDE has demonstrated a 9 percentage point increase in the graduation rate between 2008 and 2015. Currently 85 percent of Rhode Island's students graduate so it seems realistic to see another 10 percentage points of growth over the next 8 years, especially given RIDE's strategic vision and investment of resources to support its most vulnerable students. Based on past trends, the goal is ambitious and realistic.
<i>Weaknesses</i>	RIDE did not explicitly identify and describe how long-term goals for subgroups of students were determined to have different/same multi-year length of time to meet the 95% graduation rate in 2025.  RIDE's description does not explicitly state that the timeline will be the same for all students and for each subgroup of students
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	RIDE must resolve the discrepancy between the graduation goals presented in the narrative and Appendix A.  RIDE must provide long-term graduation rate goals over the same multi-year length of time for all students and each subgroup. RIDE must explain how the long-term graduation rate goals end year was set for each subgroup given the different improvement rate requirements to demonstrate the timeline is the same for all subgroups.

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>	<b>Not Applicable</b> ; but note that RIDE's response to 4.A.4.iv.c (p. 26) suggests that the State also calculates an extended year adjusted cohort graduation rate however, no long-term goals are established.
<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.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>	<p>RIDE provides measures of interim progress that all students and each subgroup are expected to meet in Appendix A. <b>P84-85</b></p> <p>Based on the charts in Appendix A, interim goals are set annually, differ by subgroup, have greater increases required in earlier years than later years, have a 2025 goal of 89-95, and do not project past long-term 95+ graduation rate goal. <b>P84-85</b></p> <p>RIDE does not explain how interim progress graduation rate goals were determined for all students and each subgroup or for each year.</p> <p>Interim goals do not culminate with the long-term goal of 95 percent proficient by 2025 for all subgroups. <b>P84-85</b></p> <p>While intended measures of interim progress address the need to narrow current gaps in graduation rates, the evident discrepancy in long-term goals among student subgroups and all students needs to be clarified.</p>
<i>Strengths</i>	<p>In Appendix A, the Rhode Island clearly displays the interim graduation goals, by year and by subgroup presenting the data in an open and transparent manner.</p> <p>Interim graduation rate goals are presented in terms the four-year graduation cohort, which is easily understood.</p> <p>Goals are set annually.</p>
<i>Weaknesses</i>	<p>RIDE does not explain why interim goals have greater increases required in earlier years than later years, have a 2025 goal of 89-95 in 2025, and do not project past 95+ percent proficient.</p> <p>There is no explanation/narrative related to Appendix A, in which relevant information is provided.</p>

<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>RIDE must provide an explanation on why the interim goals do not culminate with the long-term goal of 95 percent graduation rate by 2025 for all subgroups.</p> <p>RIDE should provide an explanation for why there are greater increases required in earlier years than later years, have a 2025 goal of 89-95, and do not project past 95+ graduation rate.</p> <p>RIDE should provide a year to accompany the Baseline header in the charts in the Appendix, A P84, as it is unclear whether the data represents 2016 or 2017 performance and the value is 85% in the narrative and 86% in the chart</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>RIDE requires greater improvement for subgroups that are further behind. <b>P18, 82-83</b></p> <p>Given the simplicity of the calculation, it is likely that significant progress in closing statewide proficiency gaps will occur because the measure is transparent and annually measured.</p> <p>RIDE provides baseline proficiency rates which show the extent or the achievement gaps and which subgroups require greater improvements to close proficiency gaps.</p> <p>RIDE states that the gap will close because the same percentage decrease is required for each group, but it is unclear how this percentage decrease is computed because end points are not the same in 2025 and increases are not the same annually or by group. <b>P21</b></p>
<i>Strengths</i>	<p>All students and all subgroups are included.</p> <p>Gaps are easily measured and understood using grade level proficiency rates.</p> <p>ELA and math are measured separately.</p>
<i>Weaknesses</i>	<p>RIDE allows more time for lower performing groups while still expecting accelerated improvement.</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</i>	

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

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>RIDE set the long-term ELP goal using the 75<sup>th</sup> percentile school score in 2017. The baseline for all ELs meeting their target in 2017 was 41%. <b>P22</b></p> <p>RIDE explains that individual student growth targets will be reset every year to acknowledge that growth is non-linear. However, RIDE does not provide an explanation of how individual student progress on ACCESS 2.0 is measured, only that it will be based on initial score and eventually grade level, or how achieving the 5.0 proficiency composite score is included in the calculation as meeting the growth target. Additionally, RIDE does not explain how the indicator calculation will be aggregated/computed. Without more detail on these two pieces, it is not possible to determine if the long-term ELP goal is ambitious. <b>P22</b></p> <p>RIDE has not fully established this goal. RIDE first administered ACCESS 2.0 in 2015-16 so 2016-17 represents the first year of progress data. RIDE plans to revisit the goals once three years of progress data are available. <b>P22</b></p>
<i>Strengths</i>	<p>RIDE is a WIDA member and administers the ACCESS for ELLs 2.0 assessment to measure English language proficiency. It has examined preliminary data and has set the proficiency standard at Level 5—Bridging. Rhode Island is in the process of developing this indicator and only has only 2017 baseline data showing a 41 percent English learners meeting their annual growth target on the ACCESS for ELs assessment.</p> <p>RIDE will revisit long-term goals when three years of data are available to ensure they are ambitious and achievable. The State tentatively is setting the long-term goal of 67 percent of English learners meeting their annual growth target by 2025.</p>
<i>Weaknesses</i>	<p>RIDE does not explain how individual student progress on ACCESS 2.0 will be calculated and targets set/reset for ELs.</p> <p>RIDE does not explain how the goal will be aggregated and computed.</p> <p>RIDE does not provide an explanation of how/if achieving the 5.0 proficiency</p>

	<p>composite score is included in the calculation as meeting the growth target.</p> <p>While RIDE makes mention of its adoption of a progress model that will take into consideration other factors besides starting language proficiency level (p. 21), it is not clear how that will be taken into account in reaching the long-term goal.</p> <p>RIDE does not explain what information will be considered once three years of progress data are available to revise the goals. The response lacks specific detail regarding the intended process of revisiting long-term goals—especially in terms of likely adjustments if they determine that the goal is overly ambitious and/or not achievable based on the timeline indicated.</p> <p>Rhode Island selected six years as the maximum for a student to reach proficiency but did not provide a rationale for this decision (i.e., research, historical experience).</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>RIDE must explain how individual student progress on ACCESS 2.0 will be calculated and targets set/reset for ELs and how the indicator calculation will be aggregated/computed.</p> <p>RIDE must provide an explanation of how/if achieving the 5.0 proficiency composite score is included in the calculation as meeting the growth target.</p> <p>RIDE should explain what information will be considered once three years of progress data are available to revise the goals.</p> <p>RIDE should provide a plan and a timeline to the Department for completing its ELP goal and provide updated data when available.</p> <p>RIDE should clarify whether the baseline for all ELs meeting their target in 2017 was 41% (narrative, <b>P22</b>) or 42 percent (reported in Appendix A).</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>	<p>RIDE sets interim goals annually using WIDA ACCESS 2.0 to achieve the long-term ELP of 67% of students meeting their annual growth target by 2025. <b>P85</b></p> <p>RIDE provides measurements of interim progress toward the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency in Appendix A. <b>P85</b></p> <p>RIDE does not explain how individual student progress on ACCESS 2.0 is measured, only that it will be based on initial score and eventually grade level, or how achieving the 5.0 proficiency composite score is included in the</p>



	calculation as meeting the growth target. RIDE does not explain how the indicator calculation will be aggregated /computed. Without more detail on these two pieces, it is not possible to determine if students will achieve English language proficiency. <b>P22</b>
<i>Strengths</i>	RIDE will revisit long-term goals when three years of data are available to ensure they are ambitious and achievable, this will presumably extend to the interim goals.
<i>Weaknesses</i>	The State has not fully developed this goal. Only the 2017 benchmark data are currently available.  RIDE does not explain how the goal will be aggregated and computed.
<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>	RIDE must explain how individual student progress on ACCESS 2.0 is measured, based on initial score and eventually grade level, and how achieving the 5.0 proficiency composite score is included in the calculation as meeting the growth target.  RIDE should explain how the goal will be aggregated and computed.  RIDE should provide a plan and a timeline to the Department for establishing its goal and provide updated data when available.  RIDE should clarify whether the baseline for all ELs meeting their target in 2017 was 41% (narrative, <b>P22</b> ) or 42 percent (reported in the appendix).

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>
----------------------

*Peer Analysis*

RIDE proposes to use an index to measure the academic achievement. ELA and math indices will be computed separately using the state assessment for grades 3-8 in ELA and math, the alternate assessment DLM, and PSAT and SAT (RIDE will divide scores into four performance levels though no details were provided on how this will be done). RIDE's proposed index will award one point for students scoring level 3 and 4, presumably proficient, and a partial point, no numeric value provided in narrative, for students scoring at level 2. **P24**

RIDE does not provide an assurance that PSAT and SAT scores measure grade-level mastery of state standards or an indication that PSAT and SAT have been approved for use as the state's ELA and math state assessments to measure grade-level proficiency. Additionally without information on whether the PSAT and SAT assessments are aligned a judgment on validity and reliability cannot be rendered.

The indicator is based on the long-term goals of achieving grade-level proficiency by 2025, so long as PSAT and SAT are measuring mastery of standards and the newly determined performance levels reflect grade-level proficiency.

The academic achievement indicator can, and will, be disaggregated for each group. The 95 percent tested requirement will be applied to the indicator for all students and each subgroup by using the number of tested students or 95 percent of students that should be tested, as the denominator, whichever is greater. **P24**

RIDE proposes to include high school growth in the academic achievement indicator and use PSAT and SAT to calculate student growth percentiles (SGP). Schools will be awarded points for Low (<35 percent), Typical (35-70 percent), and High (>=70 percent) normative growth. SGP is a normative growth measure comparing student's scores to their academic peers. Given the normative nature of the model, it is unclear how high school growth will measure grade-level proficiency. Especially when 67% of schools are guaranteed to demonstrate Typical or High growth every year regardless of actual increases or decreases in student performance. **P24**

The high school growth measure requires two years of data. RIDE does not provide information as to whether two years of data will be available for the 2017-18 school rating.

The indicator will be applied equally across all school provided the minimum N of 20 is reached. The calculation is defined, and ELA and math will be weighted equally.

Assuming the assessments are valid, the reliability of the indicator is stabilized by averaging 2 years of data.

Peers also make the following recommendations to improve the plan:

RIDE should consider the complexity of the academic achievement

	<p>indicator and how it will communicate results that are understandable to parents, community, and the public for the student mastery of standards.</p> <p>RIDE should provide an example of how the proficiency and growth measures for the high school academic achievement will be combined and/or presented would strengthen the plan. Confirmation that the High School Growth measure will be disaggregated by subgroup is needed.</p> <p>RIDE should provide the Department with a plan and timeline for completing this indicator.</p> <p>RIDE should provide an explanation of how this indicator will be affected by the assessment transition.</p> <p>RIDE should discuss the State’s policy on the inclusion of students with disabilities in the State assessments including the SAT and PSAT.</p>
<i>Strengths</i>	<p>ELA and math indicators will be calculated and reported separately for each subgroup and group.</p>
<i>Weaknesses</i>	<p>RIDE does not explain how the index is based on the SEA’s long-term goals.</p> <p>RIDE does not explain how the proficiency and growth measures will be combined for the high school academic achievement indicator.</p> <p>RIDE is in the process of transitioning assessments but does not explain how that transition may affect the indicator.</p> <p>The State does not indicate how it will disaggregate the High School Growth measure by subgroup.</p> <p>Normative models measure student growth compared to their academic peers, so it is unclear how this measure represents grade-level proficiency. An academic achievement index and normative growth models are not designed for transparency and meaningful information about proficiency for students and parents, educators, policymakers, and the public.</p> <p>RIDE does not explicitly state in its description that the Academic Achievement indicator and its calculation applies to all schools in all LEAs across the state; this may be implied, however, by their stating that the Academic Proficiency Index will be calculated for all students and each subgroup meeting minimum n-size.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (4 peer reviewers)</p>
<i>If no, describe the specific information</i>	<p>RIDE must explain what value will be used for a ‘partial point’ as credit for level 2 performance in the achievement index.</p>

<p><i>or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>RIDE must explain how PSAT and SAT are valid and reliable assessments to measure grade-level proficiency on the RIDE state standards.</p> <p>RIDE must explain how the four performance levels will be determined on PSAT and SAT.</p> <p>RIDE must explain how using SGP as the high school academic achievement indicator measures grade-level proficiency.</p> <p>RIDE should provide a discussion of how the index is related to the long-term goals set above or what the goals are for this indicator.</p>
--	---

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>RIDE proposes to use a Student Growth Percentiles Index that mirrors the growth index used for high schools but applies to grades 4-8 and an Exceed Expectations indicator in all schools as the other academic indicators. <b>P25</b> RIDE includes high schools in the Exceeds Expectations but the narrative does not explicitly state that both measures will be used for all schools or if/how these two measures will be used in the indicator.</p> <p>The <b>Student Growth Percentile Index</b> will differentiate weights, though no numeric values are provided, at a student level for Low (&lt;35 percent), Typical (35-70 percent), and High (&gt;=70 percent) normative growth. These values will be aggregated to create the index. RIDE does not explain the aggregation or provide values for the differential weights. <b>P25</b></p> <p>RIDE provides a student level example of normative growth expectations on PARCC. In the example a student scoring at the level 2/3 cut (the floor for</p>

	<p>level 3) in grade 3 will have to demonstrate High growth (70<sup>th</sup> percentile or higher) for five years to reach the floor of level 4. This means that 70 percent of students will not move to a higher performance level in five years, yet schools will annually earn credit for half of those kids! <b>P25</b> Schools are being awarded credit for outcomes that are not meaningful to kids. This strategy raises questions of validity as an academic indicator.</p> <p>Exceeds Expectations will be calculated based on the percent of students who score at level 4 on the state assessments. RIDE includes PSAT and SAT in this Exceeds Expectations measure, however these assessments are only administered in high school, the other academic indicator is reserved for elementary and middle school measures. <b>P25</b></p> <p>RIDE will average data across two years for both indicators. No further detail on the averaging procedure was provided for either indicator. <b>P25</b></p> <p>The indicators can be calculated for all students and each subgroup, but RIDE only specifies that it will do so for the Exceeds Expectation measure. The narrative does not provide any data, research, or methods to make a case for the Student Growth Percentiles Index and Exceeds Expectations to be a valid and reliable other academic indicator or if the Student Growth Percentiles Index differentiates across schools.</p> <p>The two components of this indicator contribute to meaningful differentiation among schools although some grade configurations and some small schools could have large portions of students who lack the 2 years of data required for growth determinations, particularly those with subgroup populations slightly above the minimum n.</p>
<p><i>Strengths</i></p>	<p>RIDE has selected a growth indicator for the other academic indicator for public elementary and secondary elementary schools that are not high schools. Rhode Island is creating an “Exceed Expectations Indicator” using the State assessments.</p> <p>The State plans to calculate the measures for the indicator in a uniform manner for all schools and subgroups.</p> <p>RIDE uses the percent of students exceeding expectations on state assessments in a transparent calculation.</p> <p>RIDE proposes an analysis the Exceeds Expectations Indicator once new state assessment data is available to ensure the new test differentiates as the current test.</p> <p>RIDE supports its method for determining definitions of levels of growth by referring to—and explaining the implications of—data on growth based on the PARCC assessment in which RIDE students had previously participated (switching to RICAS in 2017-2018 school year).</p> <p>RIDE usefully provides a rationale for calculating and reporting the Exceed Expectations Indicator (meaningful differentiation of schools) based on previously administered assessments and indicates plans to conduct similar analyses with data from the new state assessment system (RICAS) to which it</p>

	is transitioning in the coming school year.
<i>Weaknesses</i>	<p>RIDE presented data on the Exceed Expectations indicator to demonstrate how it would meaningfully differentiate schools. However, as the State notes, it is transitioning assessments and will need to analyze the new measure for validity, reliability, and differentiation.</p> <p>The requirement addresses an “other academic indicator” for elementary and secondary schools that are not high schools. Inclusion of the SAT and PSAT assessments in the Exceed Expectations Indicator is more appropriate for SQSS in high schools.</p> <p>The State does not describe the calculation method to combine the growth and exceed expectation measures.</p> <p>RIDE does not explain the aggregation or provide values for the differential weights used in the SGP index.</p> <p>RIDE provides a student level example of normative growth expectations on PARCC. In the example a student scoring at the level 2/3 cut (the floor for level 3) in grade 3 will have to demonstrate High growth (70<sup>th</sup> percentile or higher) for five years to reach the floor of level 4. This means that 70 percent of students will not move to a higher performance level in five years, yet schools will annually earn credit for half of those kids! <b>P25</b> Schools are being awarded credit for outcomes that are not meaningful to kids.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>RIDE must explain how the Student Growth Percentile Index will differentiate weights and how it will be aggregated into an index.</p> <p>RIDE must provide data, research, or methods to make a case for the Student Growth Percentiles Index and Exceeds Expectation as valid and reliable other academic indicators and demonstrate the Student Growth Percentiles Index differentiates across schools.</p> <p>RIDE must explain the procedure for averaging of data of two years for both indicators.</p> <p>RIDE must clarify whether the Student Growth Percentiles Index will be computed for all students and each subgroup.</p> <p>RIDE should rationalize the validity of the Student Growth Percentiles Index as an other academic indicator when schools are being awarded credit for 70 percent of kids making Typical or High growth, but only High growth kids will reach a higher performance level in five years.</p> <p>RIDE should relocate the Exceeds Expectations measure for high schools to the School Quality and Student Success measures as the Other Academic Indicator is reserved for elementary and middle schools.</p> <p>RIDE should provide clarity on if the minimum n of 20 is applied to the</p>

2-year total used for averaging it will reduce the number of subgroups excluded. That detail is not provided in this section.
---

A.4.iv.c: Graduation Rate

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>RIDE calculates graduation rate for each school or LEA in the state. For each, the four-, five-, and six-year graduation rates are weighted equally (33/33/33%) to determine the Composite Graduation Rate. While RIDE offers a commendable rationale for including in their graduation rate students who require longer than the traditional four-year timeline, the information provided in response to A.4.iv.c appears to be at odds with earlier information about long-term goals for Graduation Rate, which refers to a four-year adjusted cohort. <b>P26</b></p> <p>RIDE states that the four different graduation rates are computed for the school and LEA, but does not specify these rates are computed for each subgroup. <b>P26</b></p> <p>The narrative infers that the calculation is consistent for all high schools as another calculation is not described.</p> <p>The narrative does not address whether the indicator will be lagged.</p> <p>Page 37 indicates that the graduation rate data used for school identification will come from 2016-17 for the 2017-18 ratings. But it should still be clarified in this section of the plan.</p> <p>No detail is provided concerning how students being assessed with the alternative tests are included in grad rates.</p>

<i>Strengths</i>	
<i>Weaknesses</i>	<p>It is not clear how this indicator aligns with the State’s long-term goal of a 95percent graduation rate.</p> <p>RIDE does not address the issue of the inclusion of students with the most significant cognitive disabilities in the graduation rate indicator.</p> <p>RIDE does not provide calculations for each cohort or describe how they are reliable and valid..</p> <p>The plan could be strengthened by presenting the distribution of the graduation rates by cohorts (numbers and percentage).</p> <p>The plan could be strengthened by a discussion of why Rhode Island has decided to apply equal weighting to the four-year, five-year, and six-year cohort graduation rates.</p> <p>RIDE places minimal focus on the four-year graduation rate for which long-term goals were set.</p> <p>RIDE does not provide evidence that the composite graduation rate is valid and reliable.</p> <p>The response does not make clear that the indicator annually measures graduation rates for all students and separately for each subgroup of students.</p> <p>Although extended year grad rates are certainly allowable in this indicator, equal weighting of the 3 different rates does not likely meet the statutory requirements.</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>RIDE must demonstrate how the composite graduation rate is based on the state’s long-term graduation rate goals.</p> <p>RIDE must clarify that the graduation rates will be computed for subgroups, not just schools and LEAs.</p> <p>RIDE should clarify if the graduation rate indicator will be lagged. Page 37 indicates that the graduation rate data used for school identification will come from 2016-17 for the 2017-18 ratings. But it should still be clarified in this section of the plan.</p> <p>RIDE should place more emphasis on the four-year graduation rate.</p> <p>RIDE should not use the six-year graduation rate. If choosing to use a six-year rate, it should be part of the School Quality and Student Success Indicator.</p> <p>RIDE should describe its policies on the inclusion of students with disabilities, including those with the most cognitive disabilities, are included in the graduation rate indicators.</p>



	RIDE should provide the calculations for each cohort and describe how the measures are reliable and valid.
--	--

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>RIDE determined English language proficiency by analyzing English learner exit criteria and PARCC English language arts assessment, which provides an indication of validity and reliability. The State has defined English language proficiency as meeting Level 5 (Bridging) on the ACCESS 2.0 assessments. Schools earn points for students meeting progress towards the target or attainment of the target. Schools have up to six years to ensure students are English language proficient, 5.0 composite score, depending on initial composite scale score, 1.0-6.0. <b>P26-27</b></p> <p>RIDE will be combining two years of data for the indicator. <b>P28</b></p> <p>Initial Progress targets are determined by subtracting the initial year score from the 5.0 proficiency composite and dividing by the number of years, 2-5, to become EL proficient based on the initial score. Index points are awarded based on the proportional progress towards the target. All students will earn points for the school unless there is 0.00-point growth or less. There is no negative value assigned in the index for students decreasing in achievement. Schools are awarded 10% bonus for student exceeding the progress target. <b>P27-28</b></p> <p>Progress target are to be reset each year. However, RIDE does not explicitly state that the timeframe to reach EL proficiency will remain constant based on the initial scale score. Progress targets should only reset to increase if target was missed in the first year and decrease if the target was exceeded in the first year holding the timeframe constant. <b>P27</b></p> <p>RIDE uses a criterion based progress measure. But combining it into an index and awarding extensive partial credit to schools for students who do not meet the targets does not provide meaningful information about progress of ELs. Additionally, incentive to move kids toward meeting the targets if partial credit is awarded to all kids and bonus credit for student who exceed targets is</p>

	<p>minimal.</p> <p>It is assumed that this is the calculation for all schools across the state as it is the only calculation described. It is unclear whether this indicator includes all K-12 students in the calculation or only students in state content assessment grade.</p>
<i>Strengths</i>	<p>RIDE determined English language proficiency by analyzing English learner exit criteria and PARCC English language arts assessment that provides an indication of validity and reliability. Based on this analysis, the State has set English learner proficiency at 5 (Bridging) or higher on the ACCESS 2.0 assessments and defines English language proficiency accordingly.</p> <p>Although measures the State presents to monitor English learner progress toward proficiency may be complicated for some stakeholder groups, Rhode Island's approach appears to be on the right track. The State clearly shows how goals are reset if students are not progressing (they would have to make greater gains as the years progress).</p> <p>RIDE uses criterion-based growth to measure EL progress.</p>
<i>Weaknesses</i>	<p>RIDE does not provide the grades in which students are tested using the ACCESS 2.0 assessment.</p> <p>There is a lack of clarity on the resetting of goals including how many English learner students this would affect. If goals are continuously being reset, English learners may not be able to achieve proficiency within the timeline. For example, if a student falls far behind by year four, it may not be possible to achieve the needed proficiency gains in 1-year to meet the 5-year proficiency goal.</p> <p>RIDE uses an English Language Proficiency Progress Index awarding extensive partial credit to schools for students who do not meet the targets which does not reveal meaningful information about progress of ELs.</p> <p>Bonus points are awarded to schools for students who exceed the targets but no negative values are assigned in the Index for students who regress.</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>RIDE must specify that this indicator will be used for all school and which grades are included in the calculation.</p> <p>RIDE should consider using a simpler calculation for reporting ELs making progress towards English language proficiency. Minimally, the English Language Proficiency Progress Index should not award extensive partial credit to schools for students who do not meet the targets because this partial progress is not meaningful to students who still have to make all the progress toward EL proficiency and because the partial credit does not reveal meaningful information about progress of ELs.</p> <p>If maintaining the Index, RIDE should consider awarding negative values are assigned in the Index for students who regress to complement the bonus points awarded to schools for students who exceed the targets.</p>

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>Overall comments on indicators:</p> <p>RIDE presented a plan to phase in multiple measures of school quality and student success. Beginning in 2018 the State will incorporate Chronic Absenteeism and Student Suspensions into the indicator and add measures of High School Graduate Proficiency and Post-Secondary Success in 2019. Finally, the State will add results on science proficiency in grades 5, 8, and 11 in the Spring of 2021. Although RIDE been thoughtful addressing several dimensions of school quality and student success using multiple measures, several are not completed so it is not possible to completely assess data quality, completeness, validity, reliability, and differentiation. (pages 29-32)</p> <p>RIDE proposes to use multiple measures for the School Quality and Student Success Indicator; PK-12 Chronic Absenteeism 2018, PK-12 Student Suspension 2018, HS High School Graduate Proficiency 2019, HS Post-Secondary Success 2019, Grades 5, 8, and 11 Science Proficiency 2022. <b>P29-31</b> Each of these indicators can and will be disaggregated for each subgroup. <b>P29-31</b></p> <p>RIDE does not provide details on how the indicators will be combined and applied to the overall star rating.</p> <p>For each of these indicators, RIDE provides a description that includes definitions as appropriate and detail on grade span to which it applies.</p> <p>These indicators will provide for meaningful differentiation among schools, more so if reported longitudinally. They are easily and consistently calculated, valid, reliable, and applicable to all schools considering that 2 apply only to</p>

high schools.

### **Chronic Absenteeism**

Chronic absenteeism is measured based on the percent of PK-12 students absent more than 10% of the school days for which they were enrolled. RIDE impact data showed rates range from 0 to over 60 percent. RIDE states that chronic absenteeism and low income are linked. **P29**

RIDE does not provide data or research to demonstrate how Chronic Absenteeism is meaningful, reliable, valid, comparable and ensures that it is not systemically biased towards already low performing schools, especially given the statements that the indicator is linked to low income.

Chronic absenteeism data will be disaggregated for each major subgroup (p29)

### **Student Suspension**

Student Suspension is measured based on the number of out of school suspensions per 100 PK-12 students. This means there could be more suspensions than kids if some kids are suspended multiple times. Impact data shows 3.7 suspensions at the 25<sup>th</sup> percentile and 53.25 at the 75<sup>th</sup> percentile. RIDE states most suspensions are male, student of color, low income, and SWD. **P29-30**

RIDE does not provide data or research to demonstrate how the Student Suspension indicator is meaningful, reliable, valid, comparable and ensures that it is not systemically biased towards already low performing schools, especially given the statements that the indicator is linked to low income. [CA

Student suspension data will be disaggregated for each major subgroup (p29)

### **High School Graduation Proficiency Indicator**

High School Graduation Proficiency Indicator will be included for high schools in 2019 and transition to the Commissioner's Seal in 2022. High School Graduation Proficiency will measure the percent of graduates demonstrating proficiency on the state ELA and math assessments. **P30** While this is a good outcome measure it is ironic that there are graduates who are not proficient on the state content assessments and a separate measure is needed for proficiency on state assessments. The assumption is that this measure also captures achievement levels beyond advanced as well as proficiency.

RIDE uses objective student outcomes measures for the High School Graduation Proficiency Indicator. However, the denominator is limited to graduates, not all students, providing a misleading perspective of success at the school. Impact data was not provided to demonstrate validity, reliability, or meaningful differentiation though an analysis is to be complemented with the 2016-17 data.

	<p><b>Post-Secondary Success Indicator</b></p> <p>Post-Secondary Success Indicator will measure the percent of <u>graduates</u> that have one or more, CTE credentials, dual/concurrent enrollment credits (grade needed not specified), and/or successful completion of AP tests (not specified what successful means). In 2021 the indicator will expand to include a Seal of Biliteracy and Pathway Endorsement. <b>P30</b></p> <p>As the Post-Secondary Success Indicator has not yet been implemented, RIDE plans to analyze data after the 2016-17 school year to ensure that this indicator will support meaningful differentiation of schools.</p> <p>It is not clear whether RIDE will implement the Commissioner’s Seal and the Seal of Biliteracy in 2021 or 2022</p> <p>RIDE uses objective student outcomes measures for the Post-Secondary Success Indicator. However, the denominator is limited to graduates, not all students, providing a misleading perspective of success at the school. Impact data was not provided to demonstrate validity, reliability, or meaningful differentiation though an analysis is to be complemented with the 2016-17 data.</p> <p><b>Science Proficiency Indicator</b></p> <p>Science proficiency will be included in 2021/22 based on student proficiency on the new Next Generation Science Standards assessment. <b>P31</b> Clarity is needed as to whether Science, High School Graduation Proficiency and the Post-Secondary Success Indicators apply in 2021 or 2022, narrative states both years as implementation in 2022 or commencing with the graduating class of 2021.</p>
<p><i>Strengths</i></p>	<p>Rhode Island is incorporating multiple measures into the school quality or student success indicator, which could provide a robust picture of school climate and student success.</p> <p>RIDE focuses the SQSS indicator on objective, outcome based student learning measures for the science, high school proficiency and PSS indicators.</p> <p>RIDE’s identification of meaningful School Quality or School Success Indicators was supported by analyses of past data.</p> <p><b>Chronic Absenteeism Indicator</b></p> <p>Rhode Island has selected Chronic Absenteeism as a measure of School Quality or Student Success noting, but not citing, the research on the negative impact of absenteeism on student learning. The State’s definition of chronic absenteeism is consistent with national trends (for example, Attendance Works uses the 10 percent threshold).</p> <p>RIDE presented an analysis that demonstrated meaningful differentiation in chronic absenteeism data citing the 25<sup>th</sup> percentile of schools is 5.7 percent versus 20.7 percent at the 75<sup>th</sup> percentile of schools. The State will calculate</p>

	<p>the rate uniformly across the system and for each subgroup.</p> <p>Rhode Island will also report on teacher absenteeism where chronic absences will be defined as missing more than 10 percent of the school year excluding professional development days or long-term excused absences.</p> <p><b>Student Suspension Indicator</b></p> <p>No strengths identified.</p> <p><b>High School Graduation Proficiency Indicator</b></p> <p>High School Graduation Proficiency will measure the percent of graduates (a better measure would be 9<sup>th</sup> grade cohort) demonstrating proficiency on the state ELA and math assessments in a transparent proficiency calculation.</p> <p><b>Post-Secondary Success Indicator</b></p> <p>The State has set high expectations with the Post-Secondary Success indicator that highlights student successes beyond a traditional enrollment including earning a Career and Technical Education industry-approved credential or dual enrollment and/or AP credit. Beginning in 2021 the indicator will be expanded to include a Seal of Biliteracy for those students demonstrating proficiency in English and another language and a Pathway endorsement that indicates deep learning to prepare for further education or a career.</p> <p>RIDE’s Post-Secondary Success Indicator supports commitment to college and career readiness, by providing data on the percent of students in each high school that graduate with enhanced credentials such as a Career and Technical Education credential, Advanced Placement, and/or college credits through dual- or concurrent enrollment.</p> <p>Plans to expand the Post-Secondary Success Indicator with the Seal of Biliteracy (proficiency in English and one or more other world languages) and Pathway Endorsement (certification of “deep learning” in a chosen area) further demonstrates the State’s commitment to promoting college and career readiness.</p> <p><b>Science Proficiency Indicator</b></p> <p>RIDE plans to include Science proficiency in 2022 (or 2021; clarification is needed—see pages 31 (2021) and 29 (2022)).</p>
<p><i>Weaknesses</i></p>	<p><b>Chronic Absenteeism Indicator</b></p> <p>The indicator on chronic teacher absenteeism is under development; therefore, the State could not provide data on meaningful differentiation.</p> <p>RIDE did not provide research-based evidence as to how the Chronic Absenteeism indicator will increase student achievement and decrease achievement gaps nor how it will not systemically bias already low performing schools</p>

### **Student Suspension Rate Indicator**

Greater clarification is needed on how Rhode Island will be calculating the suspension rate. The Plan states that Rhode Island is calculating the indicator as “the number of out of school suspensions by the total number of students enrolled and multiplying this by 100.” In examining differentiation, the State found considerable range across schools from 0 per 100 to over 600 per 100 students. RIDE is using a duplicated count of suspensions over an unduplicated count of students enrolled. Also, the State notes that there is greater differentiation at the middle and high schools than elementary schools, but it is not clear if it will set different targets at each school level. Rhode Island could strengthen its plan by discussing the merits of duplicated versus unduplicated counts of suspension.

Rhode Island’s data confirms national trends that males, students of color, students with disabilities, and students who are economically disadvantaged are more likely to be suspended. Research has shown that suspensions are often due to teacher bias. It is not clear if the suspension rate is designed to hold teachers or students accountable for this indicator. The State could strengthen the plan by discussing whether high suspension rates correlate to school safety and quality or the need for better teacher training on racial bias. There could be reliability issues if these correlations and training needs have already been identified to provide equity across schools.

Including suspension rates raises concerns about perverse incentives because schools will be pressured by accountability systems to reduce suspensions even when necessary, thereby negatively impacting safe and constructive learning environments to improve student achievement.

RIDE did not provide research-based evidence as to how the Suspension Rate indicator will increase student achievement and decrease achievement gaps, nor how it will not systemically bias already low performing schools

### **High School Graduate Proficiency**

Rhode Island is developing an interim indicator for student success with the High School Graduate Proficiency (2018 through 2021) which will transition to the Commissioner’s Seal (starting 2022) measuring proficiency in mathematics and English language arts from 2018 through 2021. While the State is applauded for publishing this information, it may raise the question why schools are graduating students who are not proficient. Furthermore, the State did not provide sample data that should have been available at the end of the last school year, nor did the State address data quality, completeness, validity, reliability, or differentiation. The indicator may be more rigorous than measuring proficiency, but the link provided on Council Designations was broken.

RIDE uses the percent of graduates proficient on the state ELA and math assessment as an SQSS indicator.

	<p>RIDE uses graduates, rather than all students, as the denominator for High School Graduation Proficiency Indicator, which will provide misleading information about school success.</p> <p>RIDE does not provide impact data for the High School Graduation Proficiency Success Indicator.</p> <p><b>Post-Secondary Success Indicator</b></p> <p>RIDE uses graduates, rather than all students, as the denominator for the Post-Secondary Success Indicator, which will provide misleading information about school success.</p> <p>RIDE does not provide impact data for the High School Graduation Proficiency and the Post-Secondary Success Indicators</p> <p>The State did not provide sample data for the Post-Secondary Success Indicator that should have been available at the end of the last school year, nor did it address data quality, completeness, validity, reliability, or differentiation.</p> <p>The Post-secondary Success indicator does not define success on the AP or the criteria for earning credit for dual enrollment.</p> <p>RIDE did not provide information on how access to opportunities for earning PSS credit will be addressed.</p> <p>Science Proficiency Indicator Because the assessment is administered in three grades, it is more likely that fewer subgroups will be included in the indicator.</p> <p>Clarify when science be added (2021 or 2022)</p>
<p><i>Did the SEA meet all requirements?</i></p>	<p><b>Chronic Absenteeism</b>  <input checked="" type="checkbox"/> Yes (1 peer reviewer)  <input checked="" type="checkbox"/> No (3 peer reviewers)</p> <p><b>Student Suspension</b>  <input type="checkbox"/> Yes (0 peer reviewers)  <input checked="" type="checkbox"/> No (4 peer reviewers)</p> <p><b>High School Graduate Proficiency</b>  <input type="checkbox"/> Yes (0 peer reviewers)  <input checked="" type="checkbox"/> No (4 peer reviewers)</p> <p><b>Post-secondary Success Indicator</b>  <input type="checkbox"/> Yes (0 peer reviewers)  <input checked="" type="checkbox"/> No (4 peer reviewers)</p> <p><b>Science Proficiency</b>  <input checked="" type="checkbox"/> Yes (4 peer reviewers)</p>



	<input type="checkbox"/> No (0 peer reviewers)
<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>Overall comments on system:  RIDE must clarify when Science, High School Graduation Proficiency and the Post-Secondary Success Indicators apply. Narrative states 2021 or 2022, as implementation in 2022 or commencing with the graduating class of 2021.</p> <p>RIDE should provide details on how the multiple measures will be combined and used for each school.</p> <p><b>Chronic Absenteeism</b></p> <p>RIDE should provide a plan and timeline for calculating the teacher absenteeism rate and address data quality, completeness, validity, reliability, and differentiation. In addition describe how chronic absenteeism for teachers will be disaggregated by subgroup</p> <p>RIDE should provide research-based evidence as to how the Chronic Absenteeism indicator will increase student achievement and decrease achievement gaps. Nor how it will not systemically bias already low performing schools.</p> <p><b>Student Suspension Rate Indicator</b></p> <p>RIDE should provide research-based evidence as to how the Suspension Rate indicator will increase student achievement and decrease achievement gaps, nor how it will not systemically bias already low performing schools.</p> <p>RIDE should provide assurances that school learning environment will not be compromised with perverse incentives to reduce suspensions.</p> <p><b>High School Graduation Proficiency Indicator</b></p> <p>RIDE should consider changing the High School Graduation Proficiency Indicator to measure all students and to measure Advanced achievement on the state ELA and math assessment as an SQSS indicator. Measuring the percent of graduates that are proficient is redundant and provides misleading information.</p> <p>RIDE should use graduates, rather than all students, as the denominator for High School Graduation Proficiency Indicator, which will provide misleading information about school success.</p> <p>RIDE should provide impact data for the High School Graduation Indicator based on the available 2016-17 data.</p> <p>RIDE should provide data for the High School Graduate Proficiency/Commissioner’s Seal Indicator and address data quality, completeness, validity, reliability, and differentiation.</p>

	<p><b>Post-secondary Success Indicator</b></p> <p>RIDE should use graduates, rather than all students, as the denominator the Post-Secondary Success Indicator, which will provide misleading information about school success.</p> <p>RIDE should provide impact data for the Post-Secondary Success Indicator based on the available 2016-17 data.</p> <p>RIDE should clarify what success means on AP assessment and dual enrollment credit.</p> <p>RIDE should provide data for the Post-Secondary Success Indicator and address data quality, completeness, validity, reliability, and differentiation.</p> <p><b>Science Proficiency Indicator</b></p> <p>RIDE should provide a plan and timeline for updating the Department on the status of the Next Generation Science Standards.</p> <p>RIDE should clarify when the science proficiency indicator will be added (2021 or 2022).</p>
--	---

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Rhode Island has had an accountability system for several years and is commended for engaging educators, researchers, parents, and other stakeholders to revisit the system in light of ESSA’s new accountability requirements. It is clear that Rhode Island incorporated stakeholder feedback to make the system less complicated. The State is proposing to use a multiple measure accountability system based on all of the required ESSA indicators that come together with a school “star” rating (5 stars = highest performance; 1 = lowest performance). In theory, the point system should lead to meaningful differentiation give the analyses above on key indicators. However, many of the indicators are under development and the State did not provide a preliminary analysis of meaningful differentiation once the indicators come together using current data. Furthermore, the State did not provide a sample of how the data behind the categories come together to determine the point accrual. Seeing how the data are combined on the backend could help address differentiation issue. The plan lacks clarity of how (or if) information on subgroups would be incorporated and displayed in the system.</p>

	<p>RIDE will rate each school one to five stars using classification rules. <b>P31-32</b></p> <p>Classification rules are provided for: <b>P32</b></p> <p>Academic Achievement: Math, ELA, Max 8 points – 4 points each subject</p> <p>Other Academic Indicator: Growth in Math, ELA, Max 6 points - 3 points each subject or Graduation Rate, HS, Max 4 points</p> <p>English Language Proficiency: Progress/Proficiency, Max 4 points</p> <p>School Quality and Student Success: Max 12 points for Chronic Absenteeism, Suspension Rate, and Exceeds (ELA/Math) – However, Exceeds Expectations refers to an indicator described in the Other Academic Indicator section of the plan not the narrative in SQSS section – clarity is needed on where this Exceeds Indicator fits for Elementary/middle schools and separately for High schools. Additionally, the classification rules do not indicate how the High School Graduation Proficiency, Post-Secondary Success, and Science Indicators will be included in the star rating system.</p> <p>RIDE does not provide detail on how each indicator will be computed to understand how the points are generated for the Indicator, combined if there are multiple indicators, and then used in the classification rules. For example, the Academic Proficiency Index will generate points for ELA, but the partial point value was not provided, the calculation was not illustrated, and the values earned from the index can range from 0-100. How the 0-100 translates into a maximum of 4 points for ELA is not provided. And, in the case of a K-12 school, how the Academic Proficiency Index is combined with the High School Growth to generate an aggregate score and a classification rules point total.</p> <p>Without further specificity it is not possible to determine if the system will provide an annual meaningful differentiation of schools.</p>
<i>Strengths</i>	<p>Rhode Island has had an accountability system for several years and is commended for engaging educators, researchers, parents, and other stakeholders to revisit the system in light of ESSA’s new accountability requirements. It is clear that Rhode Island incorporated stakeholder feedback to make the system less complicated.</p> <p>The State is proposing to use a multiple measure accountability system based on all of the required ESSA indicators are aggregated to a 5 star school rating system (5 stars = highest performance; 1 = lowest performance). Building on the point system the State used in the past, Rhode Island will assign points to each indicator (30 total points for non-high schools and 34 for high schools).</p> <p>RIDE provides a table to illustrate School Classification Rules, however, it is not fully explained how the individual indicator points translate into points earned for the classification rules. (pp. 32-33).</p>
<i>Weaknesses</i>	<p>Many of the indicators are under development and the State is transitioning assessments, so meaningful differentiation cannot be confirmed at this time. Additionally, the State did not provide a preliminary analysis of meaningful differentiation once the indicators come together using current data or a sample of how the data behind the categories come together to determine the point accrual.</p>

	<p>The plan lacks clarity of how (or if) information on subgroups would be incorporated and displayed in the system (p 32-34).</p> <p>Rhode Island presents its “star” accountability system, and then introduces the concept of “red, yellow, and green” symbols of student progress in the school report cards (page 33). It is not clear how these ratings connect the “star” based accountability system.</p> <p>It is unclear what is included in the classification rules for Exceeds (ELA/Math), Absenteeism, and Suspension for a maximum 12 points. It is unclear what Exceeds refers to as this was not an indicator described in the plan narrative in SQSS section. Additionally, the classification rules do not indicate how the High School Graduation Proficiency, Post-Secondary Success, and Science Indicators will be included in the five-star rating system. The current level of specificity in the RIDE plan is not enough to understand how the classification rules are applied to schools and whether the system will annually meaningfully differentiate.</p> <p>RIDE has planned, but not yet implemented, this system, and new metrics will be added; it is thus difficult to evaluate with confidence the efficacy of this system.</p> <p>While all indicators in RIDE’s accountability system contribute to a system for annual meaningful differentiation, some of the classification rule categories appear to mask/confound information about performance on some of the indicators—most notably, Exceeds Academic Proficiency, Absenteeism, and Suspension are all included in one category for assignment of points. Under Achievement, some point ranges are followed by single or double asterisks for which no explanation is ever provided. Therefore, it is unclear how point assignment is determined for these ranges.</p> <p>Since performance of all students and each subgroup of students is calculated and reported for every indicator, according to detail provided elsewhere in the RIDE plan, one can assume that the State’s system of annual differentiation includes the performance of all students and each subgroup of students, but this is not explicitly stated.</p> <p>The State does not indicate how a school lacking data for an indicator will be handled. The nature of the classification system may allow substantial weight to the School Quality or Student Success indicator. Since it is combined (as mentioned above) with “exceeds expectations” its individual weight is not discernible.</p>
<p><i>Did the SEA meet all requirements?</i></p>	<p><input type="checkbox"/> Yes (0 peer reviewers)  <input checked="" type="checkbox"/> No (4 peer reviewers)</p>
<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this</i></p>	<p>RIDE must explain how the individual indicators will be calculated in concert with the Classification rules to create a meaningful school differentiation in the five-star system.</p> <p>RIDE must clarify what is included in the classification rules for Exceeds (ELA/Math), Absenteeism, and Suspension for a maximum 12 points.</p>

<i>requirement</i>	<p>RIDE must clarify how Exceeds Expectations fits in the classification rules for Elementary/Middle schools and separately for High schools as it was described in the plan narrative as an Other Academic Indicator but is included in the five-star rating school classification rules as an SQSS Indicator.</p> <p>RIDE must clarify how the classification rules for the High School Graduation Proficiency, Post-Secondary Success, and Science Indicators will be included in the five-star rating system.</p> <p>RIDE should clarify how information on subgroup progress will be reported for LEAs and the State.</p> <p>If possible, RIDE should provide sample data on meaningful differentiation using current data, including the number of schools falling into each category.</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>The plan lacks clarity on how Rhode Island is weighting the indicators in the accountability system. Additional data are needed to assess this requirement.</p> <p>RIDE explains the weighting of the indicators using maximum points allotted under the classification rules. <b>P32</b>  Academic Achievement: Max 8 points – 4 points each subject (Math, ELA)  Other Academic Indicator: Max 6 points - 3 points each subject (Growth Math, ELA) or Max 4 points HS Graduation Rate  English Language Proficiency: Max 4 points (EL Progress/Proficiency)  School Quality and Student Success: Max 12 points for Chronic Absenteeism, Suspension Rate, and Exceeds (ELA/Math) – However, Exceeds Expectations refers to an indicator described in the Other Academic Indicator section of the plan not the narrative in SQSS section – clarity is needed on where this Exceeds Indicator fits for Elementary/middle schools and separately for High schools. Additionally, the classification rules do not indicate how the High School Graduation Proficiency, Post-Secondary Success, and Science Indicators will be included in the star rating system.</p> <p>RIDE appears to weight each the Academic Achievement, Other Academic/Graduation Rate, and Progress in Achieving English Language Proficiency substantially.</p>

	<p>In aggregate Academic Achievement, Other Academic/Graduation Rate, and Progress in Achieving English Language Proficiency account for 18 of 30 possible points, 60%, for elementary and middle schools and 16 of 28 points possible, 57%, for high schools. While the values for the aggregate indicators is greater, it is not much greater. <b>P37</b></p> <p>While RIDE provide an explanation of weighting, it is not evident that academic indicators in aggregate carry much greater weight than the School Quality and Student Success Indicator because there is not an explanation of how SQSS indicators will combine for up to 12 points.</p> <p>RIDE does not provide impact data or other empirical evidence to demonstrate the classification rules annually meaningfully differentiate schools.</p> <p>Although RIDE indicates in their response to A.4.v.b that the rule-based method they use to differentiate all public schools in the state does not assign specific weights or allow performance on one indicator to compensate for lower performance on another, this does not appear to be accurate, based on their response to A.4.v.a. While performance on one required indicator cannot compensate for another, uneven performance on ELA and mathematics assessments can be disguised by number of points received. In addition, some of the classification rules groups combine another Academic Indicator and two School Quality or School Success Indicators, thus blurring the meaning of this set of points.</p> <p>Furthermore, although RIDE claims that it does not assign specific weights, it would appear that the range of points possible for each category does in fact create different weights for each.</p> <p>The state does not indicate how a school lacking data for an indicator will be handled. The nature of the classification system may allow substantial weight to the School Quality or Student Success indicator.</p> <p>Peers also make the following recommendations to improve the plan: RIDE should explain how the points awarded for the SQSS indicator will be divided up across the multiple measures.</p> <p>RIDE should provide impact data or other empirical evidence to demonstrate the classification rules annually meaningfully differentiate schools.</p> <p>RIDE should provide an analysis of how English learners are distributed across the State and how this would affect the English Language Proficiency indicator (i.e., how many schools would have enough students to include in this indicator.</p> <p>RIDE should discuss how the State will address groupings with less than the 20 students needed to calculate an indicator.</p>
<i>Strengths</i>	The point award systems give greater weight to proficiency than growth, which aligns with ESSA's focus on student achievement.

	RIDE places the greatest weight on Academic Achievement in ELA and Math on state assessments.
<i>Weaknesses</i>	<p>The plan lacks clarity on how Rhode Island is weighting the indicators in the accountability system. The plan states that “[the] methodology does not assign specific weights or allow performance on one indicator to compensate for lower performance on another”. However, the state is de facto weighting the indicators through the points systems to create a star rating. Without seeing backup data and calculations, it is not clear how the weighting will play out. There is concern that the academic indicators will not receive substantial weight. Of the 34 points available to high schools, 12 (or 35 percent) are based on the school climate or student success indicator. Further complicating this issue is that Rhode Island has a relatively low percentage of English learners (less than 10 percent; page 10). Further clarification is needed to demonstrate how the points for schools and districts without English learners will be redistributed in the school classification rules. Redistribution could further dilute the weighting on the academic indicators.</p> <p>The State does not address how an accountability determination will be made for any grouping with less than 20 students needed for the calculation.</p> <p>RIDE does not provide detail on how the points awarded for the SQSS indicator will be divided up across the multiple measures.</p> <p>RIDE does not provide impact data or other empirical evidence to demonstrate the classification rules annually meaningfully differentiate schools.</p> <p>RIDE must clarify how Exceeds Expectations fits in the classification rules for Elementary/Middle schools and separately for High schools as it was described in the plan narrative as another Academic Indicator but is included in the five-star rating school classification rules as an SQSS Indicator.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>RIDE must place much greater weight on the Academic Achievement, Other Academic/Graduation Rate, and Progress in Achieving English Language Proficiency in aggregate than the SQSS indicator. Current aggregate weights are 60% at elementary and middle schools and 57% at HS.</p> <p>RIDE must address the implicit weighting that occurs through maximum point values and reevaluate point system to ensure substantial weight to federally mandated indicators. For example, how would the star rating be determined if a school had 5 stars in all but one category where it earns a 1 star rating?.</p>

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>RIDE indicates it will use different method for P-2 schools only. <b>P35</b> P-2 schools will earn a star rating based on academic achievement and exceeds expectations to their feeder pattern (individual student mapping, school pairing, or LEA pairing) as well as the three PK-12 measures of Chronic Absenteeism, Student Suspension, and English language proficiency. Alternative schools, grade 9 only schools, SWD centers, were not addressed in this section.</p> <p>The state employs 3 common versions to link students in schools without testing grades to schools with assessments. It is a clear description of methodology and to whom it applies.</p>
<i>Strengths</i>	<p>RIDE has identified P-2 schools as those that are not included in the accountability system because students do not participate in the State testing program. All of the indicators that do not require test data are included in monitoring the progress of these schools.</p> <p>K-2 schools will be rated based on feeder patterns academic achievement and exceeds expectations scores.</p>
<i>Weaknesses</i>	<p>RIDE could strengthen its plan by providing the number of schools for which it cannot make an accountability determination, including how many fall into the individual student mapping, feeder school pairing, and feeder LEA pairing.</p> <p>Alternative schools, grade 9 only schools, SWD centers, were not addressed in this section.</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>RIDE must rate all schools. An explanation of how alternative schools, grade 9 only schools, schools with disabilities centers, must be addressed in this section</p>

#### 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>RIDE will identify the <u>lowest performing five percent of Title I schools</u> using all indicators and prioritizing ELA and Math achievement and growth. Of the one-star schools, <u>the lowest performing five percent of all schools</u> in terms of growth and achievement on ELA and math will be identified for CSI in 2018-19 based on 2017-18 ratings and 2016-17 graduation rates. Identification will be annual. <b>P36</b></p> <p>The State plans to identify schools in the 2018-19 school year that will allow for timely interventions. However, there are concerns about how the measure will be constructed and how Title I schools are incorporated into the ranking. In addition, as noted throughout this plan, the State is transitioning assessments and is still developing key indicators so complete data are not available to determine if the proposed method will yield the 5 percent of the lowest performing Title I schools.</p> <p>It is unclear from the narrative and corresponding graphic how CSI identification works. The narrative states RIDE will be “identifying the lowest performing five percent of all schools receiving Title I funds in the state will utilize all accountability indicators.” But then further explains that “Of the schools with a one-star rating, the lowest performing five percent of all schools in terms of growth and achievement in English language arts and mathematics state assessments will be identified.” The graphic represents only the Math Proficiency index results for all the schools. Further clarity is need on the method for CSI identification on whether all schools or just Title I will be identified, how the one-star rating factors into identification, how all indicators are used for identification and how specifically growth and achievement in ELA and Math are used to determine the lowest performing five percent of schools.</p> <p>Peers also make the following recommendations to improve the plan: RIDE’s plan would be strengthened by providing preliminary impact analysis to demonstrate that 5 percent of Title I schools are identified and articulating the method of identifying those schools.</p>
<i>Strengths</i>	Rhode Island plans to identify the first cohort of schools for comprehensive support and improvement in the 2018-19 school year. RIDE will identify schools for CSI on an annual basis for graduation rate.
<i>Weaknesses</i>	<p>RIDE does not articulate a fully developed plan for identifying CSI schools. While the scatterplot provided on page 36 illustrates the proposed approach to identifying the lowest performing Title I schools, it is not clear what data are included. Additionally, the data are presented only for mathematics. It is not clear how the State will combine the mathematics and English language arts data.</p> <p>It is not clear where the Title I variable enters the school rankings election. The plan states will sort schools with one star ratings but does not address if all one star rated schools are Title I schools or if RIDE intends to identify from all schools regardless of Title I status.</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>	RIDE must fully articulate and submit a plan that will identify at least the lowest performing 5% of Title I schools based on all indicators for CSI before the method can be applied to subgroups identification for TSI-LPS which in turn leads to CSI identification if the school meets the TSI-LPS criteria for four consecutive years.
--	--

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>	Rhode Island has made significant progress in increasing the graduation rate. Currently, 85 percent of high school students graduate and only students with disabilities meet the 1/3 threshold. The State indicated it would identify all public high schools that fail to graduate 1/3 or more of their students for comprehensive support and improvement. RIDE proposes to identify any high schools for CSI if the four-year adjusted cohort graduation rate for all students is not more than two-thirds. RIDE will identify high schools for CSI for the 2018-2019 school year based on 2016-17 data. Identification will be annual. <b>P37</b>
<i>Strengths</i>	The State indicated it would identify all public high schools that fail to graduate 1/3 or more of their students for comprehensive support and improvement. RIDE will use a four-year rate for CSI identification. The State will identify the first cohort of schools in 2018-19 based on data from the 2016-17 school years.
<i>Weaknesses</i>	The plan could be strengthened by indicating the number and percentage of schools that would be identified for comprehensive support and improvement based on the graduation rate. This implies the state will use a simple rate for this step while including a more complex calculation in the overall accountability system. While this is allowable, it does not give the appearance of a consistent system.
<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.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>	<p>RIDE will identify schools for CSI or not exiting additional targeted support if the school has two or more subgroups, or a single subgroup that represents 50% or more of the total school population, “causing the school to be identified” as TSI for four consecutive years. <b>P37</b></p> <p>The identification method is confounded by lack of clarity on CSI identification as the same method is applied to subgroups for all TSI identification.</p> <p>The system does not allow for subgroups to be classified as 1 star since 1 star may include having a failing subgroup/s. The state does not identify schools with 1 subgroup meeting the lowest 5% criteria unless the failing subgroup comprises 50% of a school’s population. The state implies that 2021 will be the first year of identifying schools under these criteria.</p> <p>Peers recommend the following to improve the plan: RIDE should remove the 50% threshold and the two subgroup requirement.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Throughout Rhode Island’s plan, the discussion on how subgroup performance would be monitored in the accountability system has been vague and continues to be vague on identifying school for additional targeted support.</p> <p>The State does not explain why a subgroup would need comprise at least 50% of the total school population to be identified (page 37). This high threshold could allow a large number of vulnerable students to fall through the cracks.</p> <p>RIDE requires two or more subgroups for CSI identification if one subgroup does not represent at least 50% of the total student population.</p> <p>The criteria for entry of CSI for not exiting TSI is meeting the TSI entry criteria for four consecutive years.</p> <p>RIDE does not make clear that additional targeted support for not exiting “comprehensive support and school improvement” status only applies here to schools receiving Title I, Part A funds.</p> <p>Four consecutive years is a long time to allow failure without requiring intervention.</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>	RIDE must fully articulate and submit a plan that will identify at least the lowest performing 5% of Title I schools based on all indicators for CSI before the method can be applied to subgroups identification for TSI-LPS which in turn leads to CSI identification if the school meets the TSI-LPS criteria for four consecutive years.
--	--

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>	RIDE will identify schools for CSI annually beginning in 2017-18 for the 2018-19 school year. <b>P37</b> RIDE will identify additional targeted support schools for CSI after four years of identification of TSI initially for the 2021-22 and annually from then. <b>P37-38</b>
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	Throughout Rhode Island’s plan, the discussion on how subgroup performance would be monitored in the accountability system has been vague and continues to be vague on identifying schools for with one or more consistently underperforming subgroups.  RIDE proposes to identify schools for TSI-CUS based on the method used for identifying CSI schools, but applied to the subgroup and not falling into the range for TSI-LPS (which also needs clarification), for identification in 2018-19 based on 2017-18 ratings. Frequency of rating is not addressed for TSI-

	<p>CUS. <b>P38</b> However, the CSI identification method has not been fully articulated.</p> <p>RIDE’s method to identify schools with one or more “consistently underperforming” subgroups of students, defining “consistently underperforming as earning only a one-star rating on RIDE’s statewide system of annual meaningful differentiation”; however, that subgroup does not fall into the range of performance for eligibility for additional targeted support and improvement with a low performing subgroup as described in the next section (A.4.vi.f).</p>
<i>Strengths</i>	The State will identify targeted support and improvement for a low performing subgroup (TSI-LPS) on an annual basis beginning in school year 2018-19.
<i>Weaknesses</i>	<p>RIDE does not articulate a fully developed plan for identifying CSI schools which is needed before the method can be applied to subgroup identification for TSI-CUS (and TSI-LPS, for which TSI-CUS identification is also needed for making identification determinations).</p> <p>RIDE should make clear that this process will be conducted annually.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>RIDE must fully articulate and submit a plan that will identify at least the lowest performing 5% of Title I schools based on all indicators for CSI before the method can be applied to subgroup identification for TSI-CUS.</p> <p>RIDE should provide clarity on how all indicators and growth and achievement for ELA and math will be used in conjunction for identification of one-star schools for CSI before the method can be applied to subgroup identification for TSI-CUS (and TSI-LPS, for which TSI-CUS identification is also needed for making identification determinations).</p> <p>RIDE must make clear that the described process is conducted on an annual basis</p>

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>	RIDE proposes to identify schools for TSI-LPS based on the method used for identifying CSI schools, but applied to the subgroup, for identification in 2018-19 based on 2017-18 ratings and annually thereafter. <b>P38-39</b> However, the CSI identification method has not been fully articulated.  RIDE will start identifying eligible schools (those with low performing subgroup[s] receiving targeted support and improvement) for the 2018-19 school year and continue to do so on an annual basis. RIDE also describes exit criteria.
<i>Strengths</i>	RIDE will identify schools for TSI implementation for 2018-19 based on 2017-18 ratings. RIDE will identify schools for TSI on an annual basis for graduation rate.
<i>Weaknesses</i>	RIDE does not articulate a fully developed plan for identifying CSI schools which is needed before the method can be applied to subgroup identification for TSI-LPS.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Yes responses are contingent upon CSI identification clarification.  RI must fully articulate and submit a plan that will identify at least the lowest performing 5% of Title I schools based on all indicators for CSI before the method can be applied to subgroup identification for TSI-LPS.  RI should provide clarity on how all indicators and growth and achievement for ELA and math will be used in conjunction for identification of one-star schools for CSI before the method can be applied to subgroup identification for TSI-LPS.

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>	<b>Not Applicable.</b>
<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.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>	<p>RIDE’s participation in state testing can, and will, be disaggregated for each group. <b>P39-40</b></p> <p>RIDE will clearly indicate on the state report card any school and subgroup that does not meeting the 95% tested requirement. <b>P40</b></p> <p>RIDE schools will not be able to earn a five-star rating if participation for all students falls below 95%. <b>P40</b></p> <p>RIDE LEAs will be required to submit a plan to engage their community to build understanding of and support for participating in the state testing if participation falls below 95%. <b>P40</b></p> <p>The 95 percent tested requirement will be applied to the Academic Achievement Indicator for all students and each subgroup by using the number of tested students or 95 percent of students that should be tested, as the denominator, whichever is greater. <b>P24</b></p> <p>RIDE does not indicate if participation is reported separately for ELA and math.</p> <p>RIDE explains that school report cards will clearly indicate when participation falls below 95% for all students or for any subgroup. In that case, LEAs must submit a plan to build community understanding and support for participation in state testing.</p> <p>RIDE identifies various measures/penalties intended to motivate LEAs and schools to ensure at least 95% participation in ELA and mathematics assessments. Of particular note, the denominator in calculating the Academic Proficiency Index will be the number of students participating in the state assessments OR 95% of the full academic year enrollment—whichever is greater, thus penalizing schools with insufficient participation.</p>
<i>Strengths</i>	<p>RIDE accounts for participation in multiple ways, state report card transparency, adjusted academic achievement denominator, and for schools with less than 95% tested, no five-star rating eligibility and required LEA plans to emphasize the importance of participating in state testing.</p> <p>Specific consequences and inducements are identified to encourage participation.</p> <p>RIDE will proactively require LEAs to submit an action plan to engage the</p>

	community if their schools fail to ensure a 95 percent participation rate in the statewide assessments
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>RIDE indicates that school can exit comprehensive support and improvement status once they meet growth and/or achievement parameters. There are several areas of concern with the State’s approach. First, the State does not provide the parameters for exiting so there is no assurance that schools will exit at a level high enough to sustain meaningful change. Second, schools can exit on achievement and/or growth. This suggests that the exit determination could be made on growth alone and students may be far from achieving the State’s proficiency standard. Third, RIDE is offering LEAs to request a waiver from being classified as a one starred school if certain conditions are met. These conditions include an assessment that the schools are on track to meet criteria. However, the State provides no evidence that schools meeting these conditions have been successful in meeting the exiting criteria. As an outsider looking in, this appears to be a loophole designed more for public relations than improving the education of vulnerable students. (page 41)</p> <p>Peers also make the following recommendation: RIDE should not provide a waiver from publicly reporting a school as a one-star rated school.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	RIDE indicates that school can exit comprehensive support and improvement



	<p>status once they meet growth and/or achievement parameters. There are several areas of concern with the State’s approach.</p> <p>The State does not provide the parameters for exiting so there is no assurance that schools will exit at a level high enough to sustain meaningful change. Schools can exit on achievement and/or growth. This suggests that the exit determination could be made on growth alone and students may be far from achieving the State’s proficiency standard.</p> <p>(page 41)</p> <p>Exit criteria are contingent on ‘identified parameters’ for achievement and growth performance which are not specified.</p> <p>Schools are not required to participate in CSI for a designated number of years before they are eligible to meet the exit criteria.</p> <p>The exit criteria appear to be normative and which does not ensure continued progress to improve student academic achievement and school success.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>RI must include in its CSI exit criteria the expectation of schools improving student achievement or meeting goals, rather than just not meeting the entry criteria. If these are the ‘identified parameters’ then RI must clearly articulate them.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>RIDE schools will exit TSI if the subgroup for which they were identified for TSI makes greater ‘annual change in statewide performance for that subgroup’ statewide. <b>P41</b></p> <p>The exit criteria do not ensure continued progress to improve student academic achievement or closing proficiency gaps. The narrative’s wording ‘annual change in statewide performance for that subgroup’ provides no assurance that student achievement for a given subgroup must improve to exit TSI. If the</p>

	state subgroup performance goes down by 11 points, and the same subgroup at the school goes down by 10 points, it reads as if the school will exit TSI even with decreased student achievement. The criteria do not comply with statute since it is based on performance relative to the state, not necessarily improvement of the subgroups.
<i>Strengths</i>	
<i>Weaknesses</i>	<p>There is concern that students could exit additional targeted support status with little change in achievement or other learning outcomes. Students could exit that status with any change in subgroups greater than the statewide average. This could be a low bar and not allow for sustained change in achievement.</p> <p>Schools are not required to participate in TSI for a designated number of years before they are eligible to meet the exit criteria.</p> <p>The exit criteria do not ensure continued progress to improve student academic achievement and school success.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>RI must include in its TSI exit criteria the expectation of schools improving student achievement or meeting goals, rather than just not besting the ‘annual change in statewide performance for that subgroup.’ The exit criteria must be based on improved performance, not merely doing better than the state average.</p> <p>RI must clarify whether change in performance of subgroups applies to both growth and proficiency, when that change in performance of all subgroups for which a school has been classified as in need of additional targeted support and improvement is compared to the annual change in statewide performance for that subgroup.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Rhode Island provided an honest assessment with its challenges with school improvement. The State indicates that it has studied lessons learned from its experiences with Priority and Focus schools and is moving forward with a School Redesign approach that focuses on authentic engagement with stakeholders. Rhode Island presented evidence that it consulted a wide research based and authentically engaged a range of stakeholders to inform its approach to School Redesign.</p> <p>RIDE CSI schools that do not exit within 4 years will be subject to one of five LEA selected school redesign models: 1. Empowerment – alternative governance, empowered leader, autonomies and performance targets agreed to</p>

	<p>by school, LEA and state 2. Restart - CMO/EMO/other state approved operating entity 3. Small Schools of Choice – reorganize into one or more small schools emphasizing personalized learning, relationships between adults and students, well defined and longer instructional blocks and focused post-secondary prep 4. LEA Proposed Redesign – new leader, new school model, and significant school autonomy 5. Closure. <b>P43</b></p> <p>Schools will not be directly assisted by the state, but rather the LEA will be the entity driving change.</p> <p>Using the same mechanisms that were not effective in getting school to exit CSI initially will not be effective in providing intensive interventions. Redesign plans must be approved by the RIDE Council for Elementary and Secondary Education. The first year of the redesign may be used for planning. After three years of redesign, not including the planning year, the Council may take additional state determined actions.</p> <p>Although peers agreed the state met the requirement they offer the following suggestions:</p> <p>RIDE should think more creatively about the role of the state, more specific state required interventions, and better strategies for LEA capacity building that focus on student outcomes and not just planning process if schools remain in CSI. These low performing schools have been under LEA direction to this point and have not successfully improved.</p> <p>RIDE should rethink the timeline before state interventions. Ten years is an extraordinarily long time for students, multiple cohorts of students, to be stuck in the state’s lowest performing schools.</p> <p>RIDE should consider options for students to exit these lowest performing schools in their first year of CSI identification.</p>
<p><i>Strengths</i></p>	<p>RIDE is focused on LEA decision making and developing school redesign plans.</p> <p>RIDE grounds their state policies and procedures for dealing with schools failing to meet exit criteria in past experiences with Priority and Focus schools, including their recognition of the importance of community engagement (citing a 2012 report on that topic).</p> <p>This is a well-designed menu of options with a high chance of success if the interventions are implemented.</p>
<p><i>Weaknesses</i></p>	<p>The State mentions it has authority of RI 16-7.1-5, but does not describe specific actions it could if schools continue to fail after three years of implementing a School Redesign Model.</p> <p>RIDE strategy of LEA Proposed Redesign for intensive interventions could be a loophole for allowing schools modest changes for four more years of operation.</p>

	Schools can be among the lowest performing in the state for 10 years before the state intervenes! One year for the school to be identified (actually two, because two years of data are proposed for each indicator), four years to exit identification, 1 year of planning for the redesign and three years of implementing redesign before the Council <b>may</b> elect to implement additional state determined action.
<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>	Rhode Island provides an assurance that it will review resource allocations. RIDE will conduct an annual comprehensive review of local, state, and federal funding sources for Titles I, II, III, and IV for alignment to LEA and CSI plans( <b>P43</b> ). However, the RIDE’s narrative was lacking in specificity on how it would approach the review.
<i>Strengths</i>	The State’s annual review of federal allocations will be aligned with LEA and school needs assessment, which should help target and leverage resources in the early stages of intervention. Rhode Island will undertake this review annually as part of ongoing monitoring and support efforts.
<i>Weaknesses</i>	Rhode Island does not define LEAs serving a <b>significant</b> percentage of schools identified for comprehensive or targeted support and improvement. RIDE provides limited detail on how it will work annually review resource allocation, work with LEAs and what will result in the review processes beyond supplementing the needs assessment and informing the school improvement planning process. The State does not discuss what actions it would take if it identified a misalignment of funds to school and LEA needs.  RIDE does not provide or explain how it will review resource allocation, only it will, and no actions or consequences are listed based on review findings to support CSI and TSI schools and districts.
<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>	RIDE must 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, describe the possible supports for LEAs in need of

<i>provide to fully meet this requirement</i>	<p>assistance, and the consequences for LEAs who fail to comply.</p> <p>RIDE should describe how the State will identify LEA serving a significant percentage of schools identified for comprehensive or targeted support and improvement.</p> <p>RIDE should discuss how the State would support an LEA in aligning funds to needs.</p>
---	--

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Rhode Island presents a well-developed technical assistance plan that is likely to serve a significant number of schools in need of support that ultimately will lead to improved student outcomes. The State articulates its vision of support in its ESSA Plan, Strategic Plan, and the Creating Pathways to Opportunity in Rhode Island ESSA companion document. Collectively, these documents set system-wide expectations for excellence and delineates roles and responsibilities for implementing comprehensive reform strategies. The State’s role is largely supportive on building LEA capacity focusing on identifying and disseminating evidence-based school improvement strategies, fostering stakeholder engagement, monitoring LEA progress, and encouraging innovation through new fiscal practices.</p> <p>RIDE has identified the technical assistance that it will provide to Title I LEAs with CSI and TSI schools.</p> <p>RIDE will provide Evidence Based Strategies for LEAs to select and implement, Tools and Resources such as methods for needs assessments, school improvement planning strategies and rubrics to review resource allocation and School Support Partners, actual human partners contracted via RFI to collaborate with low performing schools. Community Advisory Boards to engage community stakeholders for which the schools serve to support local school efforts. <b>P44</b></p> <p>LEAs must conduct needs assessments and develop school improvement plan that will be approved, monitored and reported on by RIDE. <b>P46-47</b> Funding to support school improvement is shifting from input-based to outcome focused and use Transformation Support grants to incentivize evidenced based practices. <b>P48-49</b></p> <p>RIDE provides a detailed description of vehicles for providing technical assistance to LEAs serving a significant number or percentage of schools</p>

	<p>identified for comprehensive or targeted support and improvement. One, the School Improvement Resource Hub, consists of three types of resources (Evidence-Based Strategies, Tools and Resources, and School Support Partners), each is described and two are explicitly linked to requirements under ESSA. RIDE plans to continuously update the hub as new strategies, resources, and partners (local and national organizations, other LEAs, etc.) with a proven track record for school improvement strategies are identified.</p> <p>Under the heading of Plan Development, RIDE lists requirements for school improvement plans for all schools identified as in need of comprehensive support and improvement, and proposes a timeline for planning and implementation. The processes of Plan Approval and Routine Monitoring and Reporting are also addressed by the State.</p> <p>A considerable part of RIDE’s response in this section deals with the State’s plans for allocation of the seven percent of Title I funding reserved for school improvement activities. Those plans provide a balance between allocation on a formulaic basis to support school improvement initiatives in all schools identified as in need of comprehensive support and improvement and allocation to support innovating practices, School Redesign, and dissemination of best practices. RIDE provides considerable detail on both Formulaic and Competitive School Improvement Funds.</p>
<p><i>Strengths</i></p>	<p>Rhode Island will support LEAs on identifying and disseminating evidence-based school improvement strategies through its School Improvement Hub. RIDE will also provide tools based on these strategies for school and district to use that will reduce their burden on conducting the research scans. RIDE plans to collaborate with a 3<sup>rd</sup> party with demonstrated school improvement experience to support the Hub and has set aside funds for the contract. (page 45)</p> <p>As part of the State’s vision for collective responsibility and empowerment for school improvement, Rhode Island will require LEAs to establish Community Advisory Boards (CABs) to provide broad stakeholder voice. Recognizing the State’s diversity, LEAs will have the flexibility to form their boards that in a way that best represents their communities. The CABs will be instrumental in providing community feedback on the LEA school improvement plans. RIDE will provide support to LEAs in establishing their CABs that will help ensure that they are formed with critical stakeholders.</p> <p>Rhode Island will provide continuous support to LEAs from the school improvement planning phase through full implementation. RIDE will provide model tools and frameworks for the LEA needs assessment, assist LEAs in developing their school improvement plans, approve plans, and monitor progress throughout the implementation phase. While there are elements of compliance built into the State’s role, it appears that it is facilitating a partnership among the State, LEAs, schools, and stakeholders to engage in school improvement.</p> <p>Rhode Island plans to change its approach to funding struggling schools. Unlike its past work with the Student Improvement Grants (SIG), the State</p>

	<p>will not require LEAs to select a school improvement model upfront. Instead the State will support LEAs in researching and sharing best practices to determine how best to meet the needs of their communities. Rhode Island will use half of its 7 percent of funds reserved for school improvement on school improvement formula and the other half for competitive grants. This approach balances fiscal capacity building with sparking innovations in schools in need of comprehensive support and improvement.</p> <p>Technical assistance provided by RIDE in the School Support Partners, actual human partners contracted via RFI to collaborate with low performing schools.</p> <p>Shift of funding from input based to outcome focused in the school transformation grants to incentivize evidence based strategies.</p> <p>More detail and strategy was provided in this section of the narrative than any other section.</p> <p>RIDE’s requirement for Community Advisory Boards for all schools identified as in need of comprehensive support and improvement is innovative and timely—and their recognition of the need for community stakeholders to have “a seat at the table” is commendable.</p> <p>High likelihood of success if implemented.</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.viii.f: If Applicable, Additional Optional Action

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>RIDE will permit LEAs to submit a single school improvement plan for multiple schools in the LEA and a single School Redesign effort/plan for multiple schools. <b>P50-51</b></p> <p>RIDE identifies as an Additional Optional Action the choice that LEAs with significant numbers of schools identified as in need of comprehensive support and improvement have to: 1) develop and submit a single improvement plan to</p>

	<p>the State as long as it fulfills the minimum requirements of comprehensive support and improvement plans; and 2) if applicable, pursue a single School Redesign effort inclusive of multiple schools rather than individual efforts.</p> <p>The actions described here are the same as the previous interventions with the addition of allowing LEAs to submit comprehensive plans that address multiple schools rather than individual plans for individual schools.</p>
<i>Strengths</i>	<p>LEAs 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 any LEA with a significant number or percentage of schools implementing targeted support and improvement plans will be allowed to submit a consolidated plan for school improvement. The LEAs would have additional flexibility on school funding under the single plan.</p> <p>The proposed strategy reduces LEA and school paperwork and creates efficiencies when developing improvement plans and implementing the same strategies in multiple schools, so long as the interventions are relevant in all schools.</p> <p>High likelihood of success if faithfully implemented.</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.5: Disproportionate Rates of Access to Educators (ESEA section 1111(g)(1)(B))**

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



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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Rhode Island’s response to this section was lacking in detail and disappointing given the State’s Race to the Top and other investments in supporting educators and ensuring that low income and minority students do not have disproportionate rates of access to quality teachers. Although the State met several requirements including defining and measuring ineffective, out-of-field, or inexperienced teachers, the plan falls short in not providing current data on the status of equitable access across the State.</p> <p>RIDE’s equity plan did not explicitly address Title I schools.</p> <p>RIDE identifies and defines teachers as - Inexperienced: zero to three years of experience; Out of Field: does not hold the appropriate Initial, Professional, or Advanced Certificate for the assignment. Ineffective: not performing at a consistently high level as evidenced by a Final Effectiveness Rating of Ineffective within the last three years. Chronically Absent Teacher: absent more than ten percent of the school year. <b>P52</b></p> <p>RIDE’s highest poverty and minority schools are more likely to have inexperienced teachers, support professionals, and leaders and unqualified and out-of-field teachers and administrators compared to the lower poverty/lowest minority schools. <b>P52</b></p> <p>Rates at which students are taught by an inexperienced, out-of-field, ineffective, chronically absent teachers are clearly defined in the <i>Ensuring Equitable Access to Excellent Educators - Rhode Island’s Equity Plan</i> <b>P21.</b></p> <p>RIDE has is committed to address equity issues and plans to report on key equity issues in the school, LEA, and state report cards. <b>P53-54</b></p> <p>RIDE provides clear definitions relevant to discussion of equitable access: Inexperienced, Out of Field, Ineffective, and Chronically Absent Teacher. Recognizing that systems to address different root causes are managed by different funding streams and so are challenging address strategically, RIDE is in the process of developing a coherent and comprehensive system to address these (p. 53). Besides this more specific measure to evaluate progress with respect to disproportionate rates of access to educators, RIDE adds only a general statement about plans to report on key equity indicators in school,</p>

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

	<p>LEA, and state report cards. Although RIDE notes that other examples of related initiatives can be found in the State’s <u>Companion Guide to this ESSA State Plan</u> (to which a link is provided), no page references were given, making it challenging to locate specific information on this topic.</p> <p>RIDE’s description of the extent to which low income and minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers is very general, however.</p> <p>The state employed a root cause analysis to understand the disproportionate rates of access to educators and, in the process, defined the given terms – after establishing the extent that minority and low-income students are served by these ineffective teachers. The state identified specific areas to address these problems and the conflict created by different funding sources. It is developing supports for LEA personnel departments.</p>
<i>Strengths</i>	<p>The State provided clear and reasonable definitions and measures for ineffective, out-of-field, or inexperienced teachers.</p> <p>Rhode Island built on its equity plan that it submitted to the Department by engaging stakeholders across the State on examining root causes of educator inequities. Root causes included: 1) educator preparation and identification; 2) teacher and leaders supports; 3) recruitment, hiring, assignment; and 4) teaching and learning conditions, including lack of strategic funding.</p> <p>In addition to the indicators discussed above, the State is adding a “chronically absent teacher” measure to its equity data set. This shows a good connection between the accountability systems and the work on effective educators.</p> <p>RIDE acknowledged that students attending high-poverty, high-minority schools are more likely to be taught by inexperienced, out-of-field, ineffective teachers than students in low-poverty and low-minority schools.</p> <p>RIDE has identified multiple root causes for the disproportionate access and has developed several strategies to remedy it.</p> <p>RIDE identifies and provides links to resources related to the state’s equity plan, as well as a clear and useful graphic (p. 53) on key root causes of disproportionate access to educators.</p> <p>Beyond the required identifying and reporting, the state is addressing the problem.</p>
<i>Weaknesses</i>	<p>Although the State provided definitions required under this section, the plan falls short in providing information on the current status of equitable access across the State. Rhode Island invested considerable resources in improving educator quality and equitable access including using Race to the Top funds. In its plan, the State pointed to data from the equity plan it submitted to the Department in July 2015 based on data from earlier years. One would assume that given the development of data systems to support the State’s educator workforce initiatives, Rhode Island could have provided updated information on the status of equitable access in its plan</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the</i>	RIDE should explicitly provide information related to Title I, Part A schools.

<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>The equity plan provides high poverty data. RIDE must provide Title I, Part A data.</p> <p>The plan could be strengthened by providing current data on ineffective, out-of-field, or inexperienced teachers including an analysis of disproportionate access.</p>
--	--

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Rhode Island’s ESSA plan for supporting school, including those receiving Title I, Part A funds, shows a good alignment with current State vision and policy for providing safe and healthy schools. The State is investing in Social and Emotional Learning (SEL) to promote positive school conditions including reducing the incidences of bullying and harassment. Rhode Island is receiving support from and contributing to developing SEL standards through the Collaborative for Academic, Social, and Emotional Learning (CASEL) which should advance the its commitment to implementing SEL standards and strategies across the State. The State dedicated to ensuring that all students, including LGBTQ students, can thrive in a healthy school setting.</p> <p>RIDE is committed to improving school conditions as part of the Rhode Island Basic Education Plan (Chapter 14) and the Rhode Island 2015-20 Strategic Plan for Public Education. <b>P54</b></p> <p>RIDE’s plan narrative outlines numerous supports and assistance provide to LEAs and schools on Health and Safety, bullying, suspension, Positive Behavior Interventions and Supports as well as strategies for a Multi-Tiered System of Support to improve conditions for learning. <b>P54-56</b></p> <p>RIDE specifically has strategies to reduce bullying under a statewide policy adopted in 2012 and limiting physical restraints. <b>P55-56</b></p> <p>RIDE is developing standards for social emotional learning and joined the Collaborative States Initiative of the Collaborative for Academic, Social, and Emotional Learning (CASEL) to support the development and implementation of these standards. <b>P54</b></p> <p>RIDE refers to past approaches to the non-academic conditions in schools that contribute to a safe and nurturing environment, and provides links to relevant documents. With that foundation, RIDE indicates that it is implementing a</p>

	<p>number of strategies to address health and safety. Most relevant among those described are RIDE’s participation in the Collaborative for Academic, Social, and Emotional Learning (CASEL) to support development and implementation of standards for social emotional learning. Guided by SEL standards and expectations, LEAs and schools will endeavor to reduce incidences of bullying and harassment and reduce the need for—and use of—all discipline practices including those that remove students from class and/or compromise student health and safety.</p> <p>Other strategies include (but are not limited to) efforts by members of a SEL Community of Practice to share emerging practices and support suitable strategies to reduce bullying and harassment; development of means of collecting and reporting improvements in school climate; implementation in schools of Data Based Individualization (DBI) practices that apply to social and emotional performance.</p>
<i>Strengths</i>	<p>The State has invested in data systems to identify adverse school climate incidents and conditions. Of particular merit, Rhode Island launched a new Survey Works school environment survey that is user-friendly for parents, students, and educators. Because of the new platform, the State was able to significantly increase response rates. This may be a promising practice for other States to consider.</p> <p>The planned guidance documents cover the appropriate topics for improving school conditions for student learning. RIDE is prepared to promote and improve positive school conditions.</p> <p>RIDE provides links to a number of relevant documents including the state’s Bullying and School Violence webpage, RIDE’s Limiting Physical Restraint webpage and <u>Guidance for Rhode Island Schools on Transgender and Gender Nonconforming Students – Creating Safe and Supportive School Environments</u>.</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.7: School Transitions (ESEA 1111(g)(1)(D))**

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

	<i>Peer Response</i>
--	----------------------

<p><i>Peer Analysis</i></p>	<p>As general practice for all schools, RIDE works with LEAs to ensure that there are supports and resources for students and families to facilitate key transitions and reduce the dropout rate. Although the State did not provide its framework for LEAs to support students as they transition throughout their education, it provided compelling information it meets this requirement. In particular, The State’s Early Warning System and Individual Learning Plan (ILP) process appears promising to help students in grades six through 12 successfully transition. Schools use data to determine whether students are at risk of failing and dropping out. Schools notify parents and a team puts together the ILP for the student, which includes goals and alternative learning experiences including a personalized instructional program. This initiative dovetails with the State’s vision regarding engagement and personalized learning.</p> <p>RIDE mainly leaves school transitions to LEAs, but provides regulation and policy frameworks with associated guidance and resources. <b>P56</b></p> <p>RIDE has an early warning system to help with dropout prevention focused on grade 6-12 with accompanying Individual Learning Plans to develop methods for meeting student needs and providing effective transitions, but leaves most work up to the LEAs. <b>P56-57</b></p> <p>RIDE has agreements with the Department of Children, Youth and Families to help with stability in school if student is placed in state care. <b>P56</b></p> <p>RIDE has not made explicit how these or other strategies will support LEAs, receiving assistance under Title I, Part A, in meeting the needs of students at all levels of schooling.</p> <p>Developing these plans and monitoring their progress involves extensive investment of school resources.</p>
<p><i>Strengths</i></p>	<p>Interagency collaboration between RIDE and the Department of Children, Youth, and Families to support children and youth in foster care in having stable school experience is a strength of plan.</p> <p>The State’s approach to supporting students at risk of dropping out through the Early Warning System and Individual Learning Plan (ILP) appears promising to help students in grades six through 12 successfully transition. Schools use data to determine whether students are at risk of failing and dropping out. Schools notify parents and a team puts together the ILP. This dovetails with the State’s vision regarding engagement and personalized learning.</p> <p>Early Education to Elementary school transitions are included, but mainly focuses on 6-12 years.</p> <p>Reliance on LEAs to bring it all together with extensive State support.</p>
<p><i>Weaknesses</i></p>	<p>Rhode Island notes that it has developed a regulation and policy framework to support the LEAs, including those receiving Title I funds in providing effective transitions. The State could strengthen its plan by providing a description of or link to this framework.</p> <p>Rhode Island could enhance its plan by providing data on the effectiveness of the Early Warning System and ILP including the impact of retention and dropout rates.</p>

	<p>It is not clear how RIDE will monitor the effectiveness of its strategies or will support the implementation of these activities in LEAs throughout the state. RIDE should ensure its transition supports focus on students in high need schools.</p> <p>Information appears to apply across the board to all schools in all LEAs, and not specifically to LEAs receiving assistance under Title I, Part A.</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>	<p>RIDE must explicitly address how the State will support LEAs receiving assistance under Title I, Part A to provide/facilitate effective transitions of students, particularly from middle to high school, to reduce the risk of students dropping out. If the State’s practices apply to all LEAS (and thus are no different/additional for schools in LEAS receiving assistance under Title I, Part A), this should be made clear.</p>

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>RIDE thoroughly described the entrance and exit procedures for English learners in the narrative and three associated regulation and guidance documents. All English learners will be identified upon enrollment and screened within 20 days. <b>P67</b></p> <p>RIDE state entry procedures require:</p> <ol style="list-style-type: none"> <li>1. Home Language Survey</li> <li>2. completing and reviewing the family interview form,</li> <li>3. review student records to identify potential English learner (EL) needs</li> <li>4. results of the WIDA W-APT (WIDA Access Placement Test) screening tool</li> <li>5. screened for native language proficiency p. 67</li> </ol> <p>RIDE state exit procedures require:</p> <p>Proficient outcomes on ACCESS for ELLs 2.0 assessment - Composite</p>

	<p>Literacy Score above 4.5 and Composite Comprehension Score above 5.0 and meeting key academic criteria including teacher recommendations, writing samples, and passing grades in all classes. P 68</p> <p>RIDE’s response includes additional specific detail on the use of the W-APT and an indication that state guidance on entrance will be revised when the new WIDA screening assessment (WIDA Screener) replaces the W-APT. Exit criteria will be revised to meet new WIDA ACCESS scaled scores. Exit criteria are defined in state guidance as well; these criteria were developed by a committee of EL and bilingual education professionals from across the state, in collaboration with various offices of RIDE. The state has existing requirements to address English acquisition and enhancement in the form of Regulations Governing the Education of English Language Learners that addresses the items in this section. Assessment is required within 20 days of enrollment.</p>
<i>Strengths</i>	<p>The State is using a Home Language Survey to determine if students need to be assessed for English proficiency. If parents speak a language other than English, schools use a screener (the State is transitioning from the W-APT to the WIDA screener) to determine proficiency.</p> <p>If a student has an IEP, special educators are included in the identification process.</p> <p>Students are quickly identified within 20 days of enrollment. Consistent regulation and guidance documents outlining entry and exit procedures are used across the state.</p> <p>RIDE provides links to relevant legislation and other documents related to EL entrance and exit procedures.</p> <p>As another useful source of information, RIDE requires that students be screened for native language proficiency when tools to do so are available.</p> <p>RIDE’s approach is based on existing practices.</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>	<p>Rhode Island plans to use the goals set for English learner proficiency in its accountability system monitor English learner progress. In addition, educators will have access to ACCESS for ELLs 2.0 data to measure student progress. Rhode Island has aligned the WIDA assessments with the State’s Common Core State Standards, which should provide challenging standards for English learners.</p> <p>RIDE provides a high-level response stating that ELs will be supported through WIDA Summative English Language Proficiency State Standards, the ACCESS 2.0 annual administration, and established school accountability system. <b>P68</b></p> <p>A statewide English language proficiency assessment WIDA ACCESS 2.0 is used to determine and measure the long-term goal and interim goals. RIDE uses criterion based growth to measure the progress of EL on English language proficiency for purposes of accountability.</p> <p>RIDE’s plan does not provide an explanation of how the state will actually assist eligible entities in meeting the standards, seemingly leaving this responsibility up to the LEAs.</p> <p>The state has been and continues to be intimately involved with the development of high quality assessments and instructional materials and offers extensive support to LEAs.</p>
<i>Strengths</i>	Rhode Island has aligned the WIDA assessments with the State’s Common Core State Standards, which should provide challenging standards for English learners.
<i>Weaknesses</i>	<p>Development of goals and targets does not necessarily equate with helping LEA’s ensure that English learners meet challenging state academic standards.</p> <p>Minimal information on ways RIDE will ensure that ELs meet challenging State academic standards was provided.</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>	RIDE should describe actual support, not just standards and assessments, that will support ELs in meeting language proficiency.

### 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>	<p>RIDE will monitor EL performance through annual online performance reports reviewed in the fall and Consolidated Resource plans reviewed in the spring to ensure compliance and appropriate use of funds. RIDE will conduct online monitoring to examine risk, and based on risk results will conduct 3-5 onsite LEA reviews each year. <b>P69</b></p> <p>RIDE describes technical assistance will mainly be provided through contracted services from the WIDA consortium and monthly EL directors meetings. <b>P69</b></p> <p>RIDE is also committed to build educator capacity by increasing access to EL/Dual language certification, developing a five-module professional development course and Learner Toolkits to assist in building capacity for the core curriculum in the General Ed classroom, expanding dual language programs, and introducing a seal of biliteracy. <b>P69</b></p> <p>RIRIDE describes an adequate plan for monitoring the performance of ELs.</p> <p>The state reviews compliance with state regulations and Title III funding requirement along with monitoring student success on state assessments. This oversight triggers onsite reviews of 3 to 5 LEAs per year. These visits along with communication with LEA directors identify high-need learning topics for designing technical assistance. The state lists and provides multiple resources to assist with classroom instruction.</p>
<i>Strengths</i>	<p>Rhode Island will monitor progress for entities receiving a Title III, Part A subgrant in helping English learners achieve English language proficiency through compliance and technical support. On the compliance side, LEAs must complete and submit to RIDE an online performance report addressing State and federal Title III requirements that the State approves. Using data from this report and the Consolidated Resource Plan, the RIDE has developed a risk management plan to determining if LEAs are out of compliance or need additional supports. On the technical assistance side, the State provides resources to LEAs on implementing effective strategies for English learners.</p> <p>The State conducts an annual needs assessment of English learner services directors that aid it in planning technical assistance and professional development activities.</p> <p>Rhode Island has dedicated financial resources to contract with WIDA to provide technical assistance and professional development services to LEAs throughout the year.</p> <p>The State is committed to viewing dual language as an asset rather than a deficit. Currently the State is offering teachers the opportunity to receive</p>

	<p>English Learner/Dual Language Certification through several educator preparation programs and is planning to offer students a State Seal of Biliteracy beginning in 2021.</p> <p>Online and onsite reviews are conducted for compliance. A variety of support formats are included.</p> <p>Participation in the WIDA Consortium gives RIDE access to a wide array of resources (e.g., professional learning units, opportunities for directors of EL services to meet with colleagues) that help them serve ELs in the state.</p> <p>Beyond monitoring progress and providing technical assistance, RIDE has taken the initiative to create and implement additional strategies to develop educator skills in teaching ELs, with a focus on dual language (for both teachers and students) and supporting ELs in accessing core curriculum in a general education setting (again, with a focus on both teachers and students).</p> <p>Extensive supports for classrooms.</p>
<i>Weaknesses</i>	<p>There is a skeletal description of monitoring is in the context of EL students with the responsibility for improvement, monitoring, and technical assistance relying heavily on LEAs, with the Title III Regional County Offices. LEA plans and requirements are not clearly delineated in the state plan and there is not an explanation of LEA requirements specifically related to Title III, Part A.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (4 peer reviewers) <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>	