

STATE PLAN PEER REVIEW CRITERIA Peer Review Panel Notes Template

STATE: Vermont



U.S. Department of Education
April 5, 2017

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

A.1: Challenging State Academic Standards and Assessments

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

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

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA responded “no”. Vermont administers Smarter-Balanced assessments in grades 3-9 in ELA, and presumably math (but there appears to be a copy/paste error on page 8 in the math assessment section restating that Vermont administers Smarter-Balanced assessments in 3-9 for reading) and does not administer EOCs. Not applicable. Peer reviewers agreed this is not applicable to Vermont’s application.
<i>Strengths</i>	
<i>Weaknesses</i>	Revise plan to clarify that Smarter-Balanced assessments are administered in math, not just ELA/reading.
<i>Did the SEA meet all</i>	<input type="checkbox"/> Yes (0 peer reviewers)

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

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

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

A.3.i: Definition

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The definition provided is “the minimum threshold for a required assessment in a language other than English at 10% of the testing population.” No languages currently meet this definition. The most populous language is Portuguese at .2%. Portuguese is not included using this definition.</p> <p>Vermont does not claim to take special consideration for specific populations of English learners or significant populations of English learners concentrated in one or more LEAs or by grade span.</p>
<i>Strengths</i>	<p>Allowance of single language glossaries are available.</p> <p>Smarter Balanced stacked Spanish assessments are available.</p> <p>The state sets a lower threshold than the recommendation by CSAI and offers a number of accommodations and</p>

	supports to English learners available through SBAC.
<i>Weaknesses</i>	The definition does not include Portuguese which is the most populous language – although quite low at .2%.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Vermont must include the most populous language in the definition of “languages other than English that are present to a significant extent in the participating student population”. Vermont must consider 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.

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>	As part of the Smarter Balanced Consortium, stacked Spanish assessments for English language arts and mathematics are available in all tested grades. Single-language and English-language glossaries are available for a variety of languages.
<i>Strengths</i>	Vermont participates in a consortium to provide support in this area.
<i>Weaknesses</i>	Although Portuguese is the most populous language, it is not included in the available glossaries. Vermont has twice as many Portuguese speakers but offers the assessment in Spanish only.
<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>	Since no language meets Vermont’s definition of significant extent, and the most popular language – Portuguese - is spoken by only 0.2% if the tested population, the state determined no additional assessments are needed.
<i>Strengths</i>	
<i>Weaknesses</i>	
<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>See comment under A.3.i (Vermont must include most populous language in the definition “languages other than English that are present to a significant extent in the participating student population”).</p> <p>Once the definition has been revised, Vermont must indicate whether any additional assessments are still unneeded in languages other than English. Vermont may consider additional factors such as instructional alignment and technical appropriateness when deciding any need for native assessments.</p>

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>	Vermont should revisit the definition in A.3.i. Since no language meets Vermont’s current definition of significant extent, the state determined no additional assessments are needed.
<i>Strengths</i>	
<i>Weaknesses</i>	There is no indication of how stakeholder input would be collected and considered.
<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>	See comment under A.3.i (Vermont must include most populous language in the definition “languages other than English that are present to a significant extent in the participating student population”). Once the definition has been revised, Vermont must indicate whether any additional assessments are needed in languages other than English. If Vermont intends to develop additional assessments in languages other than English, it must outline the process, timeline, and document stakeholder feedback in its application.

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>	Vermont clearly lists American Indian or Alaskan Native, Asian, Black, Hispanic, Native Hawaiian or other Pacific Islander, and White as the major racial and ethnic student groups that will be included in accountability.
<i>Strengths</i>	All groups are included in both reporting and accountability. The included table clearly indicates the rate to which each subgroup is present throughout the state.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA has included 2 additional subgroups: Historically Marginalized Students (historically underserved; members of one or more subgroup), and Historically Privileged Students</p> <p>The Historically Marginalized group includes any student with the characteristic of ethnic/racial minority, English learner, students with free and reduced price lunch, students with disabilities, and students who are migrant, foster, homeless. The Historically Privileged group includes any student without the any characteristics listed for the Historically Marginalized group.</p> <p>Vermont is using these two groups in addition to the stand-alone student groups because many schools have small student populations for the individual groups but will have these combined groups that meet the minimum N.</p>
<i>Strengths</i>	<p>These subgroups are an effort to increase transparency and to respond to Vermont’s small schools and the tendency for individual subgroups to be too small for reporting.</p> <p>All groups, stand-alone and combined, are being reported and included in accountability.</p> <p>Outcomes for migrant, foster, and homeless students can also be included despite the likelihood of low n-counts in schools and LEAs.</p>
<i>Weaknesses</i>	<p>The terms “Marginalized” and “Privileged” may be viewed as emotionally charged.</p> <p>Combined groups focus on characteristics rather than actual student academic need. Unlike subgroups based on demographic factors, subgroups based on student achievement identify those who, by definition, need more help reaching grade level proficiency.</p>

	Because the identified subgroups are not mutually exclusive, the state should ensure its accountability system fairly holds schools with high enrollment of “historically marginalized students” accountable.
<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>	The SEA chose the first option. Vermont will exclude EL students from testing on the state ELA assessment in year 1 under option 1111(b)(3)(A)(i), no further information is required. Peer reviewers agreed this is not applicable to Vermont’s application.
<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)
<i>If no, describe the specific information or clarification that an</i>	

<i>SEA must provide to fully meet this requirement</i>	
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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>	<p>Vermont has set the minimum N size at 25 students enrolled over three consecutive years for accountability purposes. Vermont further explains this would mean that schools would need to have roughly 8 students per year in any group to be analyzed for school accountability. It is unclear if the minimum N-Size is 25 unique students identified over three consecutive years for accountability purposes and whether this will be applied to all students and each student group in a consistent manner. This could mean that the minimum N is the same for all students and groups and/or that the same method over three consecutive years will be used for identifying the students.</p> <p>In response to small school sizes, the SEA is including a “Second Tier of Accountability” at the “Supervisory Union/Supervisory District”.</p> <p>Vermont requires at least 25 unique students, identified over three consecutive years, for accountability purposes. Vermont suggests this equates to roughly eight students per year. Vermont will use this threshold to apply to all students and each subgroup of students.</p>
<i>Strengths</i>	<p>The SEA is making efforts to respond to small school sizes throughout the state which could lead to small N sizes therefore leading to the prohibition of the release of much of their assessment data. By using the District strategy, 98% of communities will be able to produce accountability results in the first year for the “all student group”. Subgroups will be visible as well.</p>
<i>Weaknesses</i>	<p>Vermont stakeholder input was split on N size over multiple meetings and requests for input. Because Vermont is a small state, and many schools and nearly all groups will be excluded from accountability with a minimum N of 25,</p>

	<p>and because the stakeholder debate in Vermont was split on minimum N, Vermont should consider a lower minimum N.</p> <p>It will be necessary for the districts to “drill down” to insure that schools are able and required to develop improvement measures specifically for their students.</p> <p>Vermont has mainly small schools and a homogenous population per plan narrative and data provided. Thus, Vermont should consider a smaller minimum N size.</p> <p>If minimum N is determined for all schools and groups over three consecutive years, the trends in performance will be masked by the two prior years of data resulting in less immediate response opportunities for positive and negative trends. Vermont even cites that achieving the minimum N over multiple years will reduce the effect of any cohort of students (p17).</p> <p>An N size at 25, with one year of data, only 42% of elementary and 67% of secondary school will be accountable for all students. After three years, this jumps to 85.6% and 100% respectively. Vermont should clarify if the first year of accountability will look back at the prior two years for inclusion in accountability or will only look forward in that schools will be added after two and three years of student accumulate.</p> <p>Vermont did not provide inclusion rates for different minimum N sizes.</p> <p>Multiple years of data can mask positive or negative trends. Vermont should consider using up to three (instead of three) years of data in order to generate the minimum n-count needed. It is not clear what percentage of schools will meet the n-count in a single year, after pooling current and prior year, or current and two prior years. Also, Vermont has selected an n-size of 25 despite its incredibly small, homogeneous population.</p>
<p><i>Did the SEA meet all requirements?</i></p>	<p><input checked="" type="checkbox"/> Yes (3 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (1 peer reviewer)</p>
<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>Vermont must clarify if the minimum n-size used will occur over three years for all schools or those with less than 25 unique students in the current year only.</p>

A.4.ii.b: Statistical Soundness of Minimum N-Size (ESEA section 1111(c)(3)(A)(i))

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Vermont cites that the N size is statistically sound at 25, but would not be at a lower number, but does not explain why or provide examples of how this is true. The state “believes” a smaller n-count may lead to misinterpretations regarding school performance due to possible outlier data. However, it offers no data or evidence to suggest that an n-count of 25 avoids this issue or increases the reliability of school accountability determinations. In order to know if 25 can be statistically sound, Vermont should indicate the average size and standard deviation of all schools as well as the average and standard deviation of each subgroup.</p> <p>Vermont’s implied sampling perspective supports its use of a minimum of 25 students in a single year or across three years. The state identifies the number of schools that fail to meet an n-count of 25 due to Vermont’s exceptionally small size but it is unclear if this is in a single year.</p>
<i>Strengths</i>	<p>The SEA is trying to respond to small school sizes throughout the state.</p> <p>The SEA provides a detailed, thorough response supported with data.</p>
<i>Weaknesses</i>	<p>The fact that the 25 will be comprised of 25 unique students over 3 years may slow the ability to hold schools accountable in a timely fashion.</p> <p>The only calculation that uses a statistical procedure is the SGP calculation for the other academic indicator of growth. And, the SGP model also uses three years of student level data and is run statewide. Information from the statewide model informs the school level indicator. The SGP model is not run at the school or group level so minimum N should not be a concern with growth. The other indicators are mathematical with no procedural error that must be accounted for, and the other indicators include the universe of students at the school and group level. So, statistical reliability should not factor not the decision on N size in Vermont.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (2 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (2 peer reviewers)</p>

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

<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>Vermont must describe evidence of statistical soundness of its N size.</p>
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A.4.ii.c: How the SEA Determined Minimum N-Size (ESEA section 1111(c)(3)(A)(ii))

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	<p>The SEA described how it wrestled with the issue of small school sizes. Vermont determined the minimum N based on Field Team Input (FIT), which was comprised of diverse stakeholders to develop the state plan. The FIT team recommended putting the minimum N size discussion out for further stakeholder input, which was split, and then for public comment, which was also split on the decision. They weighed having a large enough N to maintain reliability but small enough to be capture data from small schools (i.e. privacy issues).</p> <p>The Vermont department made the decision based on statistical reliability, but does not explain why or how it impacts statistical reliability in the model or indicators.</p> <p>Vermont cited student privacy as a reason for the Minimum N be set at 25. However, the Vermont state board or education set minimum N at 11 for suppression rules back in 2008 informed by the Institute of Educational Sciences guidance indicating that student privacy was protected.</p>
<i>Strengths</i>	<p>The SEA balanced issue related to their unique small school sizes throughout the state.</p> <p>Stakeholders were consulted over multiple opportunities. The SEA’s response indicates it collected (and applied) significant stakeholder feedback.</p>
<i>Weaknesses</i>	<p>Explanation for the actual determination of the minimum was not provided, only detail on the process.</p> <p>It is not clear if stakeholders were provided information or data regarding how many more subgroups and schools would be included in the state’s accountability system given various smaller n-sizes.</p>
<i>Did the SEA meet all</i>	<p><input checked="" type="checkbox"/> Yes (4 peer reviewers)</p>

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	State policy exists that reflects guidance issued by the Institute of Educational Sciences. Vermont’s minimum N of 25 should provide student privacy, as an unrelated discussion of a Vermont SBE policy passed in 2008 suppresses student data for elements with less than 11 students, was demonstrated to be sufficient for protecting student privacy at less than half the number of students. The minimum N of 11 used for the SBE policy is supported by the guidance provided by the Institute of Educational Sciences for reporting and student privacy.
<i>Strengths</i>	The SEA has responded to the challenges small school size presents in regards to balancing transparency with confidentiality and privacy.
<i>Weaknesses</i>	Vermont should ensure its privacy techniques address masking percentages that could lead to the identification of all students (100%) or no students (0 or 0%) meeting certain conditions.
<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>	

³ See footnote 5 above for further guidance.

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>	<p>For annual reporting, the minimum number is 11 which reflects state policy and guidelines issues by the IES. Vermont cited a 2008 Vermont SBE decision for suppression of data for less than 11 students.</p> <p>The state’s minimum number for reporting is less than the minimum number of students it will use for accountability.</p>
<i>Strengths</i>	<p>Responds to the need to balance privacy with transparency and reflects best practices cited by IES.</p> <p>Vermont SBE policy on minimum N size of 11 will provide greater transparency for student performance as compared to the proposed minimum N of 25 used for accountability.</p>
<i>Weaknesses</i>	<p>This N-size for reporting, which differs from the n size used for accountability, could make it more difficult for stakeholders to link reported results directly to school accountability ratings.</p> <p>Vermont SBE suppression rules with minimum N of 11 seemed contradictory to the determination of minimum N at 25.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (3 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (1 peer reviewer)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>Vermont must provide data to demonstrate its selected n-count of 11 is statistically reliable for the purposes of reporting. The data provided should support why this n-count is statistically reliable for the purposes of reporting but not for accountability.</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>The SEA provides long term goals for all students and subgroups. The goal is that by 2025 100% of schools will show an average scale score that is at the mid-point of the proficiency range for each grade level they serve for both ELA and math (Grades 3-9). This goal applies to all subgroups as well. Baseline data is provided for all students and for each subgroup. A timeline is included with differentiated interim targets for the various subgroups based upon baseline data.</p> <p>The most recent 2016 data, nor trend data was provided. Understanding the distribution of schools after a year of improvement (2015 to 2016) would assist in understanding if the goals are aspiration and attainable.</p> <p>Vermont provides 2016 average scale scores for all students in the state, but this is not the goal. Vermont’s long-term goals are not ambitious for all students. Within the next seven to eight years, all schools are expected to have an “average” scale score at the midpoint of the proficient mark. Assuming a normal distribution of scale scores statewide, this means that almost half of students may not meet the midway proficiency benchmark.</p>
<i>Strengths</i>	<p>The goal of a scale score at the midpoint of proficiency is aspirational for some subgroups and some grade levels.</p> <p>The same endpoint is used for all student and groups; requiring greater improvement for groups further behind.</p>
<i>Weaknesses</i>	<p>Ninth grade ELA and math tests are under development. Therefore, the current targets are based upon average performance of grades 3-8 only. It is not clear how many schools are in each of the accountability level for each of the subgroups.</p> <p>The use of averages will mask the scores of low performing students with higher performing student scale scores in</p>

	<p>the school and group.</p> <p>Most Vermont schools already meet the 2025 goals in ELA for all grades and grade 3 in Math.</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>Vermont must explain how the average scale score measures grade level proficiency for all students. Vermont should explain how increases in average scale score can be used to ensure all students are improving academic achievement since an average can be improved when only top performers increase and lower performers remain left behind.</p> <p>Vermont should provide evidence on how these goals are ambitious if most schools already meet the 2025 goals in ELA for all grades and grade 3 math.</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>Vermont set average scale scores interim progress goals every three years. Interim goals are different for all students and each group because of different baselines, but all groups have the same long-term goal.</p> <p>Vermont provides baseline data and interim targets as average scale scores of students. However, Vermont's interim goals are unclear about whether 100% of schools are expected to reach the average scale score identified by the state at each interim target.</p> <p>It is possible for Vermont to demonstrate a statewide average scale score increase at each interim without increasing the percentage of schools whose average scale score meets the state's long term goal.</p>
<i>Strengths</i>	Interim goals expect groups further behind to make more progress each three-year period.
<i>Weaknesses</i>	<p>Interim goals are average scale scores allowing for higher performing students to improve while lower performing students are left behind while the school gets credit meetings the interim goals.</p> <p>Vermont does not indicate there will be annual reviews/reporting of progress; waiting three years to determine if a school is on track to meet the long-term goals may prevent early interventions to get the school back on track.</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)

<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>Vermont must provide interim progress targets aligned to the state’s long term goal identified in A.4.iii.a.1</p>
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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>While Vermont goals expect the same long-term average scale score, the measure is still relying on averages. These averages allow for potentially great disparity in achievement within the school and within groups. With no precise measure of proficiency, measuring achievement gaps, and closure of achievement gaps is problematic.</p> <p>Vermont does not provide disaggregated subgroup achievement data (grade level proficiency rates) so it is unclear whether its goals take into account improvement necessary to close potential achievement gaps. It is not clear if the state actually intends for average scale score among all students in the state to meet interim scale score targets or whether Vermont will measure the percentage of schools meeting the average target score at each interim benchmark.</p>
<i>Strengths</i>	<p>Long term goals are the same for all subgroups.</p>
<i>Weaknesses</i>	<p>Averages do not directly measure grade level proficiency. Measuring gaps in averages confounds the ability to determine gaps and performance. Simply because the average scale score difference between all students and a student group is smaller than in prior years, this does not mean more students are achieving grade level proficiency, it could mean that a few higher performing students are performing even higher than in the past.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewers) <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</i>	<p>Vermont measures interim progress using scale score averages. Vermont must demonstrate their metric will 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. For example, Vermont could provide data on the percent of students proficient to demonstrate achievement gaps for 2015 and 2016 and relate these percentages</p>

<i>requirement</i>	to the changes in scale score averages to show how the scale score averages will measure proficiency gaps and track the ability to close those gaps.
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A.4.iii.b: Graduation Rate (ESEA section 1111(c)(4)(A)(i)(I)(bb))

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

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	<p>The long-term goal for all students as well as subgroups are that by 2025, 100% of schools will have 90% of their students graduate within 4 years. Baseline data is include indicating that only a small number of schools (6) are not within striking distance already of the goal. 11 schools have already met the goal.</p> <p>Vermont sets the four-year long-term graduation goal at 90% within Table 40, but discusses a goal of 100% on page 33 under Table 12 of the application.</p> <p>All but six schools have already met the long-term goal in 2015; therefore, a peer is concerned that this long-term goal is not ambitious. It appears these goals are only ambitious for some subgroups.</p> <p>By 2025, 100% of schools will have 90% of their students graduate within 4 years. The state does not provide disaggregated baseline data. The long-term goals are not ambitious for many of the student groups with graduation rates just under the 90% goal. The state does not provide trend data to suggest the increase of 2.4% over 7 years qualifies as ambitious improvement. A goal of 90% is not “ambitious” for student groups that graduate 100% or even 88.8% of students currently.</p>
<i>Strengths</i>	<p>The SEA has worked within the New England Secondary School Consortium to determine this goal.</p> <p>The same long term goal is set for all students and each group.</p>
<i>Weaknesses</i>	<p>This goal leaves 10% of Vermont’s students not graduating within 4 years. While there is an additional target of 100% of students graduating within 6 years (see A.4.iii.b.2), the plan does not indicate specifics as to how this 10% of students would be supported during the additional two years.</p>

	<p>Based on the state’s demonstration data, the long-term goal was met by 55 schools in 2015; only six schools did not meet the long-term goal of 90% making this an attainable but unambitious goal.</p> <p>The rationale provided to setting this unambitious goal was concern from stakeholders artificially promoting students who have not met the standards under the ‘proficiency-based graduation system.’ However, this was not cited as a concern with the six-year rate set at 100%.</p> <p>Vermont did not provide 2016 data or trend data to understand its graduation rate goal setting context. If graduation rate has been trending downward, perhaps 90% is ambitious; currently, graduation rate goals for all students statewide are set only slightly above the state’s current graduation rate for all students statewide.</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>	Vermont should demonstrate how its long term goals are sufficiently ambitious for all students and each subgroup of students given those subgroups whose graduation rates nearly meet or exceed the state’s targets in the baseline year.

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>	By 2025, 100% of schools will have 100% of their students meet graduation proficiencies within 6 years. This applies to all students and all subgroups, and baseline data is provided. A timeline is included, and the same long-

	<p>term goal is used for all subgroups. In that this goal indicates 100% graduation rate for the 6 year cohort, it is ambitious and is more rigorous than the long-term goal for the 4-year cohort.</p> <p>Regardless of the level of measurement, 100% is required for both the percentage of schools and percentage of students expected to meet goals.</p>
<i>Strengths</i>	The goal includes 100% of students. The goal expects all kids to graduate within six years, which is more rigorous than the 90% four-year graduation rate goal.
<i>Weaknesses</i>	<p>The plan does not indicate specifics as to how this 10% of students (remaining students not expected to graduate within four years) would be supported during the additional two years.</p> <p>This goal may not be very ambitious for multiple subgroups in most schools which already meet the 2025 goal in 2015. Only five schools do not meet the 2025 long-term six-year graduation rate goal.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.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>Measurements of interim progress toward the long-term goals are included for both the 4 year and 6 year cohorts for all students and for all subgroups.</p> <p>Vermont sets interim goals at three year intervals separately for all students and each group until 2025 where goals are the same for all students and groups.</p>

	Vermont provides baseline data and identifies interim progress targets for the four-year adjusted cohort graduation rate and the six-year adjusted cohort graduation rate.
<i>Strengths</i>	Student groups that are further behind require more improvement to meet the interim and long-term goals.
<i>Weaknesses</i>	Interim goals are not very rigorous as only five and six schools do not meet the long-term goals for the four- and six-year graduation rate in 2015.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The long-term goals require greater rates of improvement for subgroups who currently graduate from high school at lower rates.</p> <p>Vermont provides the table of interim goals and long-term goals demonstrating that all students and each group have different baselines and different interim goals, but the same endpoint for the long-term goals, which if reached, will close the gap.</p> <p>The state’s identified long-term goal confuses the percentage of students graduating statewide with the percentage of schools on-track to meet the state’s graduation expectations within four and six years.</p>
<i>Strengths</i>	Student groups that are further behind require more improvement to meet the interim and long-term goals.
<i>Weaknesses</i>	The Native Hawaiian or Pacific Islander group has already surpassed their long-term goal and White students are one percentage point away from their 2025 long-term goal.
<i>Did the SEA meet all</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers)

<i>requirements?</i>	<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>	If the state's unit of measurement is the percentage of schools with a 90% 4-year graduation rate or 100% 6-year graduation rate, the state must provide data to ensure increases in the percentage of schools which meet targets can actually close subgroup graduation rate gaps among all student groups. Specifically, when measuring the percentage of schools meeting the graduation rate target, there should be an accounting for whether subgroup gaps decrease, increase, or are maintained.

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>The SEA identifies the timeline for students to gain proficiency based upon their initial level of English proficiency; students entering at a lower level will have longer to attain proficiency. Interim targets and a long-term goal are identified (100% of LEP students attaining ELP on time by 2025.) Because Vermont's current NCLB framework does not mandate minimum/maximum years for students to become proficient, baseline data was calculated by examining the percentage of Vermont students taking the ACCESS in 2009-2010 and attaining proficiency within the number of years associated with that ACCESS score using the state's proposed timeline. 48 schools had data that was included in this calculation.</p> <p>Vermont expects ELs to exit the program within five year setting the long-term goal at 100% of student attaining English proficiency by 2025. Proficiency attainment expectations are determined by student entry level with the lowest level 1 having five years to attain proficiency and the highest levels 5 and 6 being already determined English proficient.</p> <p>Based on 2015 data, currently 55% of students are attaining English proficiency on these timelines.</p>
<i>Strengths</i>	Based upon a starting point of 55%, reaching 100% is ambitious. Thirty two schools do not meet the 2025 target, while 16 schools meet the target and no schools hits the bull's eye rating.

	<p>For long-term EL goal setting, Vermont used the minimum N at 4, but it remains at 25 for accountability.</p> <p>Vermont sets expectations for EL proficiency based on the extent of each students' EL need at the time of identification.</p>
<i>Weaknesses</i>	<p>Only a relatively small amount of schools had data on which to develop baseline data. However, this must be considered in the context of the state's low ELL percentages overall.</p> <p>Given the limited EL population in Vermont, consideration should be given to partnering with other states or the WIDA consortium to understand data trends and performance on ACCESS (as well as instructional strategies) to best serve EL's in Vermont.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.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>	Interim targets are provided. Vermont set interim progress goals every three years, evenly splitting the difference between 55% and 100% over the three intervals to arrive at 100% English proficient in 2025 (increasing by 15 percentage points each three-year period).
<i>Strengths</i>	
<i>Weaknesses</i>	Vermont should consider an annual 'check-in' on progress to ensure schools are making progress towards the three year interim goals.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the</i>	

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

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

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

A.4.iv.a: Academic Achievement

- Does the SEA describe the Academic Achievement indicator used in its statewide accountability system, including that the SEA uses the same indicator for all schools in all LEAs across the State?
- Does the description include how the SEA calculates the indicator, including: 1) that the calculation is consistent for all schools, in all LEAs, across the State; 2) a description of the weighting of reading/language arts achievement relative to mathematics achievement; 3) if the State uses one, a description of the performance index; 4) if, at the high school level, the indicator includes a measure of student growth, a description of the growth measure (*e.g.*, a growth model); and 5) if the State averages data, a description of how it averages data across years and/or grades (*e.g.*, does the State use a uniform averaging procedure across all schools)?
- Is the indicator valid and reliable?
- Is the indicator based on the SEA’s long-term goals?
- Can the indicator be disaggregated for each subgroup of students?
- Is the indicator measured by grade-level proficiency on the annual statewide reading/language arts and mathematics assessments?
- Does the indicator measure the performance of at least 95 percent of all students and 95 percent of all students in each subgroup?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The same indicator is used for all schools across the state. The Smarter Balanced Assessments will be utilized. Vermont will use average scale scores in lieu of proficiency rates as a measure of academic achievement. The state provides no impact data to suggest that schools that are on-target have higher percentages of students performing on-grade level than schools that are off or near target.</p> <p>Average scale scores are used in long-term academic achievement performance goals; however, it is still unclear as to whether the state’s goal intends to increase the percentage of schools meeting the average scale score goal or increasing average scale scores statewide.</p>

	<p>The plan states Vermont will use a ‘simple’ mean when combining multiple grades at the school. However, there is no explanation of the ‘simple’ mean calculation. A ‘simple’ mean could be computed where each student score weight equally in the calculation or where each grade level weight equally. Vermont should explain how the ‘simple’ mean will be computed as well as the use of multiple years of data.</p> <p>Academic achievement indicator will be calculated separately for ELA and math, each earning a rating of off-target, near target, on-target, and bull’s eye. The academic achievement indicator will count 20% of the summative rating, each subject will account for 10%.</p> <p>While scale scores are valid and reliable for the purpose of measuring student mastery of standards, the averaging of scale scores for the academic achievement indicator does not accurately represent grade-level proficiency for all students. The averaging masks individual student performance and the average scale score does not equate to student proficiency.</p> <p>While Vermont assures 95% of students will be tested, the plan does not explain how a school’s academic achievement indicator will be specifically impacted if 95% of students are not tested. This is a requirement of the statute although states may additionally use low test participation rates in its system of annual meaningful differentiation in the way Vermont describes.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Rationale for using average scale score is not compelling or supported by evidence. It is unclear whether this approach is valid or reliable for differentiating among schools based on the achievement of all students and each subgroup of students. According to the state, a focus on proficiency has had the “unintended consequence of narrowing school-level focus to support the students most near the proficiency-cut score.” This new focus on average scale scores allows improved scale scores among higher achieving students to mask the lack of proficiency or progress among non-proficient students. There are serious concerns about using average scale scores given the impact of outliers on small sample sizes. For example, using Vermont’s minimum n-size of 25, the average scale score might still be on target if one student out of 25 makes the “bull’s eye” while all others score just below proficient.</p> <p>It is understandable that Vermont has suppressed data for student groups being at 100% and 0% proficiency, but that should not be the driving rationale for using scale score averages as this confounds the transparency of data even further. The second rationale for scale score is the concern about focusing only on students close the proficiency bar, Vermont provided commentary, but no evidence that this occurs.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)

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

In reference to A.4.iii.a.1 if Vermont should make any changes to its long term goals it should revisit how it addresses this criteria (i.e. the indicator is based on long-term goals).

Vermont must provide data to indicate its use of average scale scores is valid and reliable for the purposes of differentiating among schools based on students achieving grade-level expectations. Vermont should provide evidence that average scale scores do not mask proficiency, measure grade level mastery, and reduce achievement gaps. Averaging, combined with a minimum N of 25, and very few students in the individual groups leads to concerns about leaving traditionally low performing students behind. Vermont should demonstrate, with data, how the ratings for academic achievement compare using average scale score versus percent proficient for understanding grade level proficiency and achievement gaps.

The state does not take into account low test participation rates into its academic achievement indicator. Vermont must explain how schools will be accountable in the academic achievement indicator for testing 95% of students and groups. While test participation rates below 95% impact a school's summative score, Vermont's measure of academic achievement must include the greater of at least 95% of all students or the number of students tested.

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>	Student growth in both ELA and math will be measured using the Student Growth Percentile method requiring 3 years of data. Cut scores for the four levels of performance have not yet been determined – this process will be

	<p>completed by Dec 2017. The SEA indicates the indicator can be disaggregated.</p> <p>Growth will be calculated for students in grades 5-9 using three years of student data and disaggregated by subgroup.</p> <p>Vermont intends to use student growth percentiles in ELA and Mathematics for grades 5-9 only. Vermont does not state if they use any additional factors, aside from two prior test scores, to create a growth model for the SGP calculation.</p> <p>It is unclear whether Vermont plans to operationalize SGP using a median score or some other quantification method for determining to what extent schools are growing their students.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The SGP model, while valid and reliable, is not meaningful to students in the context of meeting grade-level proficiency. Vermont is using strictly normative growth, which does not measure student progress towards mastery of the standards and does not ensure that a student making growth each year will eventually achieve grade-level proficiency. Measuring growth only compared to peers is not meaningful to students for knowing if they are on track to be grade-level proficient or college and career ready.</p> <p>This growth measure will not capture growth after the first year of high school as it is based upon scores from grades 5-9 only.</p> <p>The indicator of average scale score in the academic achievement combined with a normative growth model compounds the inability to measure the student performance against grade level proficiency. The state should ensure that schools with growth scores above the 50th percentile are truly progressing with students rather than regressing at slower rates than academic peers. The way the calculation is described in the plan, only half of the students in the state will be able to demonstrate growth in any given year. Academic performance could go through the roof in Vermont with every kid improving an achievement level, but because of the normative nature of the model, half of the students would not be considered to have made growth. Additionally, improvements of progress on growth statewide cannot be compared annually because the distribution will remain constant.</p> <p>Vermont will not calculate student growth scores for students tested on SBAC in both 3rd and 4th grade.</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</i>	

<i>SEA must provide to fully meet this requirement</i>	
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A.4.iv.c: Graduation Rate

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The graduation rate indicator is described and is the same for all public high schools in Vermont. Vermont will use both 4 and 6 year graduation rates in its accountability system. A description of the calculation is included. The indicator is an average of the 4 year and 6 year adjusted cohort rates. An alternative diploma is not utilized. The indicator can be disaggregated.</p> <p>Vermont will use a ‘simple’ mean of the four- and six- year graduation rates for all schools with grade 12. It is not clear if each student will weigh equally in the calculation or if the four- and six- year rates will get equal weighting in the calculation. Vermont should explain the ‘simple’ mean using an example.</p> <p>Although Vermont describes its process to assign performance categories (pg. 43) to each of the 4 and 6 year graduation rates, it is clearly articulated on Appendix B’s “worked example” if each of these rates will receive the average of the performance category scores. The only “worked example” in Vermont’s plan applies to middle school grades only.</p>

<i>Strengths</i>	
<i>Weaknesses</i>	<p>Based upon the 4 tier levels of performance, the “Bull’s Eye” target can be reached while 10% of students do not graduate in 4 years and 6% of students do not graduate in 6 years.</p> <p>The four-year cohort rate only counts for half of the indicator.</p> <p>The bull’s eye rating expectation of 90% and on-target rating of 80% has already been met by all but six schools. Vermont sets low expectations for the highest ratings. The average graduation rate in 2015 was 87.6% which is 7.6 percentage points higher than the 80% required for an on-target rating.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Vermont must clearly demonstrate how it will combine both 4-year and 6-year graduation rate ratings to assign points in its overall system (e.g. provide a “worked example” for K-12 or high schools)

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>Acceptable progress is determined using an Annual Growth to Target formula. The use of ACCESS suggests reliability and validity. The indicator is determined consistently across schools and LEA’s and allow for disaggregation.</p> <p>Vermont includes EL progress and proficiency on ACCESS. The time given to reach English proficiency differs</p>

	<p>based on initial scores. The scores and length of time for the indicator calculation differ from the long-term goals score and length of time. Six years is given in the EL indicator while the long-term goal was based off a five-year time frame for ELs who entered at level 1. Likewise, ELs entering at level 5 on the long-term goals are considered proficient while in the EL indicator these level 5 ELs have two years to attain English proficiency. Vermont must clearly define the state determined proficiency level on ACCESS. Vermont should also explain the reason for this difference in the number of years to achieve English proficiency in the long-term goals and exit criteria which use level 5 and the EL indicator which uses level 6.</p> <p>Vermont will be using scale scores to determine the expected growth and whether the student met expected growth for the EL indicator. Vermont computes the observed scale score gain by Target score – current score /number of years = observed scale score gain. However, the plan does not provide an explanation of how the observed scale score gains are going to be aggregated and rated for the school. Vermont does not specify which grade levels will be included in the EL indicator.</p>
<i>Strengths</i>	<p>An attempt has been made to individualize this indicator based upon the expected growth target being reset each year for each student.</p> <p>Students with higher levels of English ability at initial identification are expected to attain English more quickly.</p>
<i>Weaknesses</i>	<p>As previously stated, the state does not take into account the student’s grade level or years left of a FAPE in setting EL proficiency expectations.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (0 peer reviewer(s))</p> <p><input checked="" type="checkbox"/> No (4 peer reviewer(s))</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>In reference to the discrepancy on pages 34 and 44, Vermont must align progress in achieving English language proficiency with the state determined timeline as described in A.4.iii.c.1.</p> <p>Vermont must explain how the observed scale score gains derived from the annual growth to target formula will be used in the school rating. Vermont must clarify which ACCESS-tested grades are included in the EL progress and proficiency metrics.</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>Science will be included using average scale score the same way it is computed for ELA and math and applies to all schools and could be disaggregated by group. The new test is not yet developed; proposed scale score cuts are currently based on the current NECAP performance levels. The long term goal is the same as for ELA and math. Grades: 4,8,11.</p> <p>Physical education will be included for all schools. While Vermont has not selected an assessment, it will be administered at least one grade level in elementary, middle, and high and will assess whether kids are within or progressing towards the ‘healthy zone’ on the Presidential Youth Fitness program. The indicator is based upon stakeholder input as well as standards developed at the state level. A vendor for development of the assessment has not yet been identified. Anticipate focusing on one grade per level (elem, middle, high). Vermont anticipates utilizing the Presidential Youth Fitness Program-aligned “healthy zone” and would use the same 4 levels of performance as other indicators. Long term goal – by 2025 100% of schools will have 100% of students in the healthy zone, or making progress towards the healthy zone. The indicator can be disaggregated and should differentiate, but data is not yet available to demonstrate differentiation.</p> <p>College and career readiness will be measured in high schools by <u>graduates</u> (consider using the 9th grade cohort as the denominator to ensure inclusion of all students) have earned passing/college ready scores on ACT/SAT, AP, IB, dual enrollment, CLEP, ASVAB, and industry certifications. The indicator can be disaggregated and should differentiate, but data is not yet available to demonstrate differentiation.</p> <p>College and career readiness will also be measured in high schools by the percent of <u>graduates</u> (consider using the 9th grade cohort as the denominator to ensure inclusion of all students) who enroll in college or trade school, enter the workforce, or enlist in the military within 16 months after graduation. The indicator can be disaggregated and should differentiate, but data is not yet available to demonstrate differentiation.</p>

	<p>The college and career readiness indicators will be averaged together to for a single indicator. It is unclear for the indicator if the four- or six-year graduate will be use and if it is 16 months after the four- or six- year graduation date. Vermont should clarify the inclusion and calculation. Also, students enlisting in the military have entered the work force in most states as the Department of Labor will have record of these students earning wages in a labor sector. Vermont should also clarify what workforce participation qualifies as success, any job, or a livable wage job. If any job, then that is not college/career ready.</p> <p>It is assumed the college and career readiness indicators will be lagged data. Vermont should explain the timeline for inclusion of the data based in accountability year and the graduation/college and career ready year included for accountability.</p>
<i>Strengths</i>	<p>Vermont’s SQSS indicators focus on the whole child and utilize the same 4 level performance reporting system.</p> <p>Vermont’s SQSS indicators are outcome-based indicators focusing on science assessment results, physical fitness outcomes, results from ACT/SAT, AP, IB, dual enrollment, CLEP, ASVAB, and industry certifications, and postsecondary enrollment or career placement within 16 months.</p>
<i>Weaknesses</i>	<p>Assessments are not yet developed – difficult to determine validity and reliability. Lack of baseline data – particularly for PE and college/career readiness indicators.</p> <p>Science should meaningfully differentiate schools as impact ratings from 2015 are provided showing no schools meeting the bull’s eye rating and spread through the other three target ratings only. Use of average scale scores for science outcomes.</p> <p>Vermont asserts students’ college going rates serve as a valid indicator of college and career readiness; however, Vermont does not indicate whether it will take students’ rate of postsecondary remediation into account. National Clearinghouse data may indicate students’ successful enrollment into postsecondary institutions; however, some students may not be ready to enroll in college-level coursework. Inability to differentiate among students limited to remedial coursework versus those successfully engaged in postsecondary coursework seriously threatens the validity of this indicator as a measure of students’ readiness.</p> <p>Vermont will use only high school graduates in calculating the college-going rates of schools. Excluding the students that struggle to complete high school alongside their peers limits the accountability for college and career readiness to only those students who high schools successfully graduate.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewers) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the</i>	Once the PE indicator is fully developed, Vermont must demonstrate its PE indicator allows for meaningful

<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>differentiation in school performance, is valid, reliable, comparable, used statewide in all schools (for the grade span to which it applies), and calculated in a consistent way. Vermont should explain the method that will be used for calculating the physical education indicator once the test has been selected. Vermont should also provide more detail about how the PYFP will be administered and how it is accessible to all students.</p> <p>Vermont should further explain the inclusion of students and calculation of the college and career ready measures, including workforce participation success.</p>
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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>Vermont will rate schools using summative ratings of off-target, near target, on-target, and bull’s eye. To calculate the summative rating, the rating from each of the indicators is translated to points, 1 for off-target, 2 for near target, 3 for on-target, and 4 for bull’s eye. These points will be weighted equally and averaged to get the summative score. The summative score will range from 1-4. If the school has less than 95% tested, the summative score will be multiplied by the percent of eligible students tested to earn a new, lower, summative rating.</p> <p>Most of the Vermont indicators will meaningfully differentiate schools based on the provided impact except for graduation rate where nearly all schools were already on-target or bull’s eye. Some indicators did not have data available so it is unclear if their inclusion will allow for meaningful differentiation.</p> <p>Vermont’s four levels of targets will assess current and year-to-year change of All students and an Equity Index. Vermont’s system includes all indicators described and all subgroups once all school quality/student success indicators such as Science and physical education are piloted.</p> <p>While Vermont includes all required indicators in Table 28, it does not include an indicator of School Quality or Student Success in its first year of implementing this accountability system (in Table 29).</p>
<i>Strengths</i>	<p>Vermont uses strong student outcome based indicators for school quality/student success.</p>

	The SEA indicates that the report card will allow the public to drill down to each performance indicator and to access data for all student groups.
<i>Weaknesses</i>	It is difficult to understand how all performance indicators will factor into the four indicators that will be on the report card. Graduation rate does not differentiate schools based on impact data provided in the plan.
<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>	Vermont must include all indicators (specifically at least one indicator of School Quality or Student Success) in its accountability system beginning in 2017-2018. Table 28 and 29 suggest Vermont will not include any indicators of SQSS until after the 2017-2018 school year. Vermont’s system of meaningful differentiation includes multiple measures currently used in academic achievement, other academic indicators (i.e. growth of high needs subgroup), and graduation rates (i.e. graduation rate of high needs subgroup) that it could explore as measures of school quality or student success until proposed SQSS measures are ready for inclusion.

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>	Vermont substantially weights each indicator and the academic and EL indicators, in aggregate, are much greater weight than the school quality/student success indicator. Vermont includes all required indicators at seemingly appropriate weights in Table 28; however, Table 29 does not include an indicator of School Quality or Student Success resulting in zero weight in the first year of implementing this accountability system. Vermont describes a method for adjusting the weighting of indicators not present in a school or when the N is too low.

	<p>If a school does not have the EL component the weighting will be distributed across the other indicators to maintain the relative weights. Vermont should consider redistributing the weight only to the academic indicators rather than across all indicators.</p> <p>If college and career readiness is not available at a school, those points are redistributed too. Assuming, though not explicitly stated, that a K-4 school would be graded only on achievement in ELA and math since no growth is included until grade and science is not tested until grade 5 and the PE has not determined tested grades yet. Or a grade 10-12 school with only graduation rate and college and career ready data would be graded on just those two components and no test data.</p>
<i>Strengths</i>	<p>In aggregate, indicators for academic achievement, graduation rate, other academic and LEP receive much greater weight than school quality or student success indicators.</p> <p>Strong student outcome indicators are used for school quality/student success indicators.</p> <p>The state places a large emphasis on student outcomes and performance.</p> <p>Vermont includes all required indicators at seemingly appropriate weights in Table 28.</p>
<i>Weaknesses</i>	<p>Ten percent of the overall rating is on the six-year graduation rate cohort.</p> <p>In 2017-2018, Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators each receive substantial weight individually. In 2017-2018, these indicators receives the entirety of the weight. Table 29 does not include an indicator of School Quality or Student Success resulting in zero weight in the first year of implementing this accountability system.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (2 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (2 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>As described previously in A.4.v.a, Vermont must include all indicators (specifically at least one indicator of School Quality or Student Success) in its accountability system beginning in 2017-2018.</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>Methodologies for small schools, special population schools, and newly opened schools (or merged schools) are included and described, including the types of schools to which each situation applies.</p> <p>Vermont proposes a second tier of accountability at the district level (school level accountability at the district level) to capture all small schools in accountability and to review the schools’ performance within the district to determine the need for CSI or TSI.</p> <p>Vermont does not have schools that serve special populations. Students the leave the state to attend a school serving special populations are required to that the Vermont state assessment and those results are credited back to the district for second tier accountability.</p> <p>New schools will also be accountability under the rating system. Vermont is experiencing declining enrollment and not opening new schools, but mainly merging schools to create new schools. When a new school is created by merging two schools, the TSI or CSI status of the bigger school is adopted. This is an okay strategy, but concerning to remove services from kids in the new school, Vermont should consider continuing services at the school until the next rating cycle.</p> <p>P-2 schools are not specifically addressed, but presumably fall under small schools, and be included in second tier accountability for identification of CSI and TSI.</p>
<i>Strengths</i>	<p>The SEA has considered special situations Vermont is likely to encounter, such as merged schools.</p> <p>District level accountability for small schools allows all students’ to be included in the state’s accountability system. Students who attend specialized schools will be included in the accountability system via state assessments attributed to their home supervisory union. Vermont has a plan in place for supporting newly reconstructed schools – as opposed to newly opened schools – due to declining enrollment.</p>
<i>Weaknesses</i>	<p>The state should clarify what supports would be available to schools/districts in need of support but possibly ineligible for Title I funds due to size.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (3 peer reviewers)</p> <p><input checked="" type="checkbox"/> No (1 peer reviewers)</p>

<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>Vermont must describe its methodology for small schools (i.e. second tier accountability at the Supervisory Union/Supervisory District level and/or when it will use multiple years of data included) and how it will be used to identify schools for comprehensive and targeted support and improvement.</p>
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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>Vermont describes its methodology to identify the 12 lowest performing schools based on their “priority” status, priority points, and number of students enrolled. Vermont will support at least 12 schools (or 5%) based on the most need beginning in the 2018-2019 school year.</p> <p>The lowest performing schools, off-target, with no improvement would be Priority 1 schools. Priority 3 schools would be near target or off-target schools that made some improvement, etc. Vermont will identify the lowest 5% of TI schools, 12 total schools for CSI. Priority 1 schools will be first identified, then Priority 2, etc. until 12 TI schools are identified. If there are more than 12 schools identified by Priority status, points will be reviewed and number of students to determine which schools will be served.</p> <p>Comprehensive support schools will be identified every three years.</p>
<i>Strengths</i>	<p>Identification based on current year rating plus improvement over prior year.</p> <p>Schools’ annual improvement trajectory is used as a factor in identifying schools for comprehensive support.</p> <p>The state presents a thorough response, particularly to address the potential >5% identification of schools.</p>

<i>Weaknesses</i>	By not using a summative score on the state’s accountability system, it will be possible for over 12 schools to be included in Priority 1 indicating a more significant need than Vermont’s resources allow.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	After identifying the lowest performing five percent of schools, Vermont will add high schools not yet identified that have less than 67% graduation rate to the comprehensive support list. These schools will be identified every three years beginning with identification for services in 2018-19.
<i>Strengths</i>	Identifying schools based on the four-year cohort rate.
<i>Weaknesses</i>	Based on data provided in the plan, no school or group falls below the comprehensive support 67% graduation rate threshold for the four-year rate. This indicates a possible weakness in that previously stated that graduation goals should be reviewed for rigor.
<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</i>	

<i>SEA must provide to fully meet this requirement</i>	
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A.4.vi.c: Comprehensive Support and Improvement Schools—Additional Targeted Support Not Exiting Such Status

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	Vermont provides a timeline for how it will annually identify targeted support schools for comprehensive support after at least three years of targeted support status. Schools will first be identified for Targeted Support and Improvements in the 2018-19 school year with the first round of comprehensive support identification following three years later. These schools will continue to be identified annually since targeted schools are identified annually the three years will be on a rolling basis.
<i>Strengths</i>	The equity score will illustrate the extent to which the school is closing achievement gaps. The equity score looks at both current scores and change from one year to the next.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>Vermont must demonstrate how its targeted support criteria results in the identification of schools whose subgroups perform similarly to those in the lowest 5% regardless of their current year change.</p> <p>Vermont must clarify how schools will be identified for targeted support in the 2018-19 school year using its definition of “consistently underperforming” subgroups.</p> <p>Vermont should provide more detail about the equity index and explain how decreases in historically advantaged groups will impact the ability to identify and support struggling subgroups using its equity index.</p>

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>	<p>The frequency of identification for comprehensive support id (every 3 years) is identified. They will be identified for the first time in 2017-2018.</p> <p>Vermont will identify schools every three years for comprehensive support. The first identification will be based on 2017-18 data for services beginning in the 2018-19 school year. Given this identification, it is unclear how year over year change will be measured for that first year of identification.</p> <p>Vermont will make its first identification of schools requiring Comprehensive Support in Fall of 2018 based on student performance on indicators collected during the 2017-18 school year. Schools will remain in this cohort until the next identification cycle in 2021. Future identification cycles will begin in 2024 and then again in 2027.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Identification every three years means students in low performing schools may not get services needed especially if the school just missed getting identified in the first year. Given the small number of schools, and the small size of most Vermont schools, consideration should be given to more frequent identification, or minimally annual assurances that schools are reviewed and low performing schools that are losing ground could be eligible for more support in the intervening years.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

- Does the SEA describe its methodology to identify schools with one or more “consistently underperforming” subgroups of students, including its definition of “consistently underperforming”?

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Consistently underperforming subgroups will be identified annually. The equity index allow for identification of subgroups. Will be based on all indicators through a formula consistently applied across all schools and LEA’s.</p> <p>Vermont does not describe how targeted support schools are initially identified, only that the consistently underperforming targeted schools will be identified using 2017-18 data for services in 2018-19.</p> <p>Vermont states that consistently targeted support schools will be evaluated in the following year to determine underperforming groups to identify consistently underperforming targeted schools for the first time in 2019-20, using two years of data and designating these schools as Targeted 2. A Targeted 1 support school will be identified as consistently underperforming Targeted 2 if the school does not move to a yellow on-target or green bull’s eye rating.</p> <p>There may be an error in Vermont’s description of how it uses an equity index to identify targeted support 1, 2, and 3 schools (pg. 63 “5. The “Current Score” for historically marginalized students is subtracted from the “Current Score” of historically marginalized students. 6.The difference is the school “Equity Index.”). Vermont does not provide a definition of “consistently underperforming” in its accountability system. Its equity index takes into account academic progress necessary to close achievement gaps year over year.</p>
<i>Strengths</i>	Improvement is required to avoid identification as consistently underperforming.
<i>Weaknesses</i>	A clearer definition of consistently underperforming is needed.
<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>Vermont must clearly explain its method to identify schools with one or more “consistently underperforming” subgroups of students.</p> <p>Vermont must clarify its definition of “consistently underperforming”.</p> <p>Vermont must clarify how schools will be identified for targeted support in the 2018-19 school year using its definition of “consistently underperforming” subgroups.</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>	<p>The methodology consists of an equity index to examine the current score and annual progress of all reporting groups. It would appear the equity index is utilized across all schools.</p> <p>Vermont proposed the use of an equity index to identify additional targeted support schools. Vermont will compute a rating for each group at the school, then the historically marginalized groups will be compared to the historically advantaged groups to determine the difference in scores. These differences in scores will be rated as off-target, near target, on-target, and bull’s eye. The following year, these schools will be identified for targeted support 1, 2, 3, based on the improvement of the equity gap scores.</p> <p>If this is how Vermont will identify Targeted 1 schools, then Vermont will not be identifying any schools for Targeted support in 2018-19.</p> <p>Vermont’s use of an equity index may not result in the identification of schools where the performance of any subgroup is similar to performance of students in schools identified in the bottom 5%. Subgroup performance is evaluated based on a difference in performance compared to non-subgroup members. Schools with large equity disparities or subgroup performance comparable to the lowest 5% statewide may not be identified if their current year performance improves. While improvement may be used in exit criteria, the criteria taken together may not result in the identification of schools whose subgroups require academic support and intervention.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	It is not explicitly stated as to whether the methodology identifies schools from among all public schools or from among only the schools identified as schools with one or more consistently underperforming subgroups.

	The improvement in the equity gap could result from lower scores from the historically advantaged group and no improvement from the historically marginalized group.
<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>	Vermont must demonstrate how its targeted support criteria results in the identification of schools whose subgroups perform similarly to those in the lowest 5% regardless of their current year change. Vermont must clarify how schools will be identified for targeted support in the 2018-19 school year using its definition of “consistently underperforming” subgroups. Vermont should provide more detail about the equity index and explain how decreases in historically privileged groups will impact the ability to identify and support struggling subgroups using its equity index.

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>	Vermont is not electing to include additional statewide categories of schools. Peer reviewers agreed this is not applicable to Vermont’s application.
<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)
<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>Vermont describes how it will use an average of the participation rates of all students and each subgroup of students to trigger a consequence so schools earn a score proportional to the average percentage of students tested.</p> <p>Vermont does not factor the 95% tested requirement into academic achievement. Instead, Vermont multiplies the summative score by the percent of eligible students tested if the 95% tested requirement was not met to reduce the summative score and possibly overall rating.</p> <p>Vermont should explain how the proposed inclusion will impact the academic achievement indicator. Presently, the explanation show how participation rate impacts the summative rating only, VT should demonstrate how multiplying the participation rate of less than 95% impacts each indicator and the show the reaggregation of indicators resulting in the same effect as applying the 95% tested multiplier to the summative rating. VT applies participate rate requirements to academic achievement and all indicators, a more rigorous expectation than required.</p>
<i>Strengths</i>	<p>Vermont differentiates by degree on which the participation criteria was not met because the multiplier is lower for the lower participation rate schools but does not differentiate over length of time participation rate is not met. Participation rate is an annual measure, no multiyear averaging.</p> <p>Participation rate directly impact the summative rating for the school.</p>
<i>Weaknesses</i>	Averaging the participation rates of all reportable groups does not appear to fit within the spirit of accountability for test participation of all students and of each subgroup individually.
<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>After 3 years, schools may exit comprehensive support by improving annual performance and by demonstrating positive improvement in scores over time. Schools are identified for comprehensive support every 3 years. Per table 33, schools may stay in comprehensive status for 3 cycles equaling 9 years. More rigorous interventions are put into place after the 2nd 3 year cycle – during years 7, 8 and 9 on comprehensive support.</p> <p>Vermont schools may exit comprehensive support after three years after their initial identification if the school improved their current score/rating by two levels or improved the rating and the year to year change each by one level.</p> <p>Vermont’s exit criteria require annual performance improvement by two levels or significant positive improvement in scores within three years.</p>
<i>Strengths</i>	<p>Requires the school to make actual improvements in student outcomes compared to a fixed expectation.</p> <p>Exit criteria recognizes schools that are improving.</p> <p>Schools which improve over time yet remain in the bottom 5% are eligible for continued financial and technical support.</p>
<i>Weaknesses</i>	<p>Alignment with the State’s long-term goals and measurements of interim progress are not explicitly discussed.</p> <p>It is unclear if this will happen in a ‘non-identification year for comprehensive support.</p> <p>It is unclear whether Vermont’s exit criteria will meaningfully differentiate schools which no longer require comprehensive supports if schools which improve over time yet remain in the bottom 5% may choose to exit comprehensive support prematurely.</p> <p>Schools may enter and re-enter targeted support status indefinitely without additional interventions as a</p>

	comprehensive support school since their targeted status can be reset with each new subgroup identified (pg. 66).
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Schools may exit targeted assistance when they enter the “on target” or “bull’s eye” levels of the four-tier reporting categories. If a school exits targeted status related to one subgroup, but retains targeted status for others, its targeted label will continue.</p> <p>Vermont will exit schools from targeted support annually if the school moves to an on-target yellow box or bull’s eye green box for the group. If a school meets the exit criteria for one group, but is still identified for other groups, the school will remain and could advance in targeted support.</p>
<i>Strengths</i>	<p>Moving to the “on target” or “bull’s eye” levels indicates that progress has been made and gaps are closing.</p> <p>Continued identification and scale up even if some groups exit targeted support of other groups do not meet the exit criteria.</p>
<i>Weaknesses</i>	<p>It is feasible that a school may enter and re-enter targeted status with varied subgroups and stay on targeted status for an indefinite time without exiting or becoming comprehensive. (ie. Year 1: targeted SWD; Year 2: targeted</p>

	SWD and EL; year 2: targeted EL; year 1: targeted SWD; year 2: targeted EL and SWD) Equity index may not account for performance of historically advantaged group declining so schools could exit without improvement of the historically marginalized group.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	Schools receive more rigorous interventions if they enter a third cycle of comprehensive support (years 7,8,9). Vermont cites state statute for continued comprehensive support, schools that have not exited after two identifications, and six years of support. In years 7, 8, and 9 of comprehensive support will draw from a list of state determined actions, continued technical assistance, adjustment of enrollment boundaries or responsibilities of the superintendent, state administrative control to correct deficiencies, and school closure or district paid tuition at another public school. No further detail is provided on the state identified actions. It is unclear how the decision will be made to implement each of the actions.
<i>Strengths</i>	A variety of options are included in order to meet the identified need/problem. Most interventions are sufficiently rigorous and state sanctioned.
<i>Weaknesses</i>	“Continue technical assistance” – if this technical assistance has occurred for 6 years and the school hasn’t exited comprehensive support, it is not apparent if continued technical assistance can be more effective in years 7,8,9. No detail is provided on how the action is determined.

	<p>The action of continued technical assistance seems weak for schools in years 7, 8, and 9 of comprehensive support.</p> <p>No terminal action is defined if the school does not exit comprehensive support after year 9.</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>Vermont must implement more rigorous interventions for schools that continue to require additional comprehensive support after the state-determined number of years (which cannot exceed four years). Currently, Vermont implements more rigorous interventions only after 6 years of identification which is outside the statutory allowance of up to four years.</p>

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>This area is problematic for Vermont due to small school/district sizes and due to a state Act requiring the merger of many smaller systems.</p> <p>Vermont does not specifically address how it will periodically review resource allocations for support schools and districts. Vermont is developing a Uniform Chart of Accounts and financial data system for LEAs to track per student expenditures. The project was started in 2014 under directive of state law to assist with reducing expenditures of small districts and assist in identifying consolidation opportunities. The system is anticipated to be operational in 2019-20 allowing for Vermont to monitor the allocation of resources regularly to ensure equitable funding.</p> <p>It is unclear how often the SEA plans to monitor resource allocations and it is unclear how it will go about monitoring resource allocations for schools with no data to submit to its uniform procedure under development.</p>
<i>Strengths</i>	<p>Vermont is making efforts to comply with this requirement in a very complicated landscape.</p> <p>Developing a system to track funding and expenditures statewide, not just support schools.</p>
<i>Weaknesses</i>	<p>Vermont will not be able to meet this requirement until 2019-2020.</p>
<i>Did the SEA meet all</i>	<input type="checkbox"/> Yes (0 peer reviewers)

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

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

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

<i>Peer Response</i>	
<i>Peer Analysis</i>	<p>The SEA describes an escalating and differentiated plan of support to each LEA so that the LEA may, in turn, support the individual schools. All schools, regardless of level of support, are required to develop a Continuous Improvement Plan (CIP).</p> <p>Vermont has an Education Quality Assurance Team that will help districts conduct ‘data-rich comprehensive needs assessments’ and develop capacity at the local level to remedy these needs. The team will identify evidence based interventions and help local leaders select the appropriate interventions to use in the schools.</p> <p>Vermont will be conducting remote and onsite monitoring of the continuous improvement plans.</p> <p>Vermont describes several strategies it will use to support comprehensive and targeted support schools – one of which is “continued technical assistance”. Vermont does not describe what this continued technical assistance may consist of beyond standard state action such as desk audits and on-site monitoring.</p>
<i>Strengths</i>	<p>With effective planning, a CIP can be an effective tool to insure schools are constantly changing and growing to meet student needs.</p> <p>Vermont is committed to building local capacity.</p>

<i>Weaknesses</i>	<p>The state indicates overly broad areas to be used as support (i.e. monitoring, application of federal funding) as opposed to evidence-based interventions (i.e. professional development practices, teacher recruitment and retention support).</p> <p>Detail on the actual support and interventions, beyond having the team work with local leaders, is limited.</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>Vermont must provide an explanation of how technical assistance will be provided and how it will improve outcomes rather than just identifying the requirements of moving through comprehensive support.</p> <p>Vermont should explain how the team will review and select evidence based interventions for consideration by the local leaders.</p> <p>Vermont should explain the process for a comprehensive needs assessment conducted by the team in partnership with the local leaders.</p>

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>Vermont describes “regional differences” which would likely result in the identification of specific LEAs with comprehensive and targeted support schools. Vermont vaguely describes building local capacity in an effort to improve the LEA. Additional optional action is not required.</p> <p>Vermont does not specifically address the requirement. The plan states that few districts in Vermont have more than one school at each grade span, so the concentration of districts with multiple schools will be limited and the state will be able to invest in capacity building in these districts.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The fact that higher need schools can be predicted from certain LEA’s allows the Vermont-AOE to work more closely with those LEA’s. However, this is not a strategy or an action. This does not enable Vermont to do anything differently than if schools in need of additional support were more dispersed geographically.</p>
<i>Did the SEA meet all</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers)

<i>requirements?</i>	<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>	Vermont must explicitly describe the action 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. If Vermont has no additional optional actions to take with these particular LEAs, Vermont's application should reflect this (which is allowable).

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Vermont provides definitions for ineffective teacher, out-of-field teacher, inexperienced teacher, low-income student, minority student. The state developed and used an Educator Equity Plan to collect data, identify equity gaps, and develop strategies in regards to teacher and leader equity throughout the state.</p> <p>Vermont provides a comprehensive analysis chart of poverty and minority comparisons. The data show low-income and minority students are not currently being disproportionately served by ineffective, out-of-field, or inexperienced teachers. In Vermont high-poverty schools teacher are more experienced, highly qualified, better paid, and more experienced leadership. In minority schools, the opposite is true, but the difference in percentages and pay is nominal.</p>
<i>Strengths</i>	It appears low-income and minority students are not currently being disproportionately served by ineffective, out-of-field, or inexperience teachers.

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

	<p>Vermont is committed to collecting and sharing the comparison data and the assurance of continued review to ensure continued educator equity</p> <p>The response is strengthened by the SEA’s proactive approach to addressing disproportionate rates of access to educators.</p>
<i>Weaknesses</i>	<p>Ineffective teachers are defined as those who are teaching out-of-field on an emergency or temporary license. While these characteristics may be predicted as being related to ineffectiveness, there are other characteristics that may contribute to fully licensed teachers being ineffective. How is the state’s teacher evaluation system utilized to determine “ineffective teachers”? This is important in that the ineffective teacher category is used as a reporting category.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (4 peer reviewers)</p> <p><input type="checkbox"/> No (0 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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>Vermont describes how it will use indicators within its accountability system, statewide advisory councils, and statewide school improvement initiatives to combat bullying/harassment, overuse of exclusionary discipline practices, and aversive behavioral interventions.</p> <p>Vermont is committed to reporting Safe and Healthy schools’ data, including climate surveys. Vermont has a</p>

	statewide advisory council to address bullying, harassment, hazing complaints and requires a district to designate a responder. Most Vermont use programs (SWIFT, PBIS, others) to promote positive learning. Vermont committed in the state plan to encourage districts to use federal funding on interventions to create safer environments. Vermont states it does not support ‘adverse behavioral interventions’ and deals with it in two ways through school improvement work, first by examining the underlying causes and then by utilizing preventative programs to minimize it.
<i>Strengths</i>	Preventive programs such as PBIS and SWIFT are in place in many schools. A statewide committee is in place to address hazing, harassment, and bullying.
<i>Weaknesses</i>	Lacks more specific strategies.
<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>
<i>Peer Analysis</i>	<p>Vermont provides a lengthy description of its continuous improvement framework as well as other statewide initiatives to improve student academic outcomes. Vermont will utilize its school improvement model as an avenue to provide technical assistance to LEAs in supporting successful transition of non-elementary school students.</p> <p>The SEA will support LEA’s via the continuous improvement process which utilizes an Education Quality Review to examine and drill down data to identify strengths and weaknesses. This process includes graduation data.</p> <p>Vermont explains that school configurations differ by district so the local leaders must tailor solutions to their specific needs and circumstances. However, Vermont has a statewide continuous improvement framework to</p>

	address system efficacy, which in part includes student transitions and explains that transitions will be addressed locally in these plans.
<i>Strengths</i>	The continuous improvement process has the potential to allow Vermont to address the unique needs and school configurations of the various LEA's. Uses evidence-based research such as MTSS and data driven decision making.
<i>Weaknesses</i>	The discussion in this section is primarily regarding graduation. Vermont does not provide examples of transition strategies used by select districts in the continuous improvement plan. Vermont lacks more specific strategies for promoting effective transitions from middle to high schools in LEAs with non-tradition 6-8 or 9-12 grade configurations.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	Vermont describes its process for gathering stakeholder feedback regarding entrance and exit requirements for English learners. Vermont will continue to work with relevant stakeholders to refine these requirements when necessary. Vermont provides assurance students can be identified within 30 days of enrollment in a public school. Stakeholders included members of the WIDA state assessment consortium and EL educators from across the state

	<p>In 2017-18 Vermont is moving to a single entrance screener for students identified via the Home Language Survey as potential English learners. The WIDA screener will be administered in the first 30 days of enrollment to determine initial classification and placement.</p> <p>WIDA ACCESS 2.0 will be used as the statewide exit assessment. Students earning a composite score of 5.0 plus a minimum 4.0 on reading and writing domains will exit EL services.</p>
<i>Strengths</i>	<p>Aligned with accountability process.</p> <p>Statewide entry and exit criteria are set using nationally-recognized assessment tools.</p> <p>Further screening is available for potential English learner families.</p>
<i>Weaknesses</i>	<p>Discussion not apparent for local input into the state’s exit procedures.</p> <p>Vermont should consider accelerating the timeline for identification for student enrolling mid-year to be 15 days since there will be less students requiring testing mid-year compared to beginning of the year.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (4 peer reviewers)</p> <p><input type="checkbox"/> No (0 peer reviewers)</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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>	Vermont will provide some “combination of monitoring, evaluation, and the provision of technical assistance, with the specific supports varying from school to school and LEA to LEA, in accordance with each educational systems’

	needs”.
	The SEA describes the continuous improvement process which will include ELP data which will identify equity gaps to drive the improvement plan.
<i>Strengths</i>	Comprehensive and targeted support schools will receive more intensive interventions when appropriate.
<i>Weaknesses</i>	Vermont does not provide detail about how it will help districts and schools make progress towards long-term goal and meeting standards citing that the continuous improvement process will take care of the details on a local level and that data from equity gaps should drive action plan components. Vermont will monitor the progress of all LEAs in meeting goals but it is unclear how the state intends to accomplish this specific to EL populations and what supports it will make available once LEAs fail to meet goals.
<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>	Vermont must provide an explanation of what must be included in a continuous improvement plan to support ELs. Examples from current local plans, or best practices implemented previously in the state would assist in explaining the expected supports.

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>	Vermont “is developing a more integrated, collaborative approach to monitoring the progress of Title III sub grantees in helping ELs achieve proficiency. Title III and Title I staff are working together to plan and better coordinate protocols used to monitor LEAs’ progress.” The collaboration of Title I and III staff to evaluate consolidated applications and conduct desktop and as well as on-site monitoring will increase alignment with long-term and interim goals in the state’s plan. However, the specific steps the state will use to identify and then improve or increase support to eligible entities is unclear.
<i>Strengths</i>	

<i>Weaknesses</i>	Monitoring and desktop audits are not technical assistance.
<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>Vermont must describe its timeline, process, and activities related to desktop audits and onsite monitoring used to monitor the progress of each eligible entity in helping English learners achieve English language proficiency.</p> <p>Vermont must describe the steps and modified strategies its Title I and/or III staff will use to further assist ineffective schools in helping students achieve EL proficiency.</p>