

# STATE PLAN PEER REVIEW CRITERIA Peer Review Notes Template

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STATE: West Virginia



**U.S. Department of Education**

## **Background**

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

### **Role of the Peer Reviewers**

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

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

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

## **How to Use This Document**

The peer review criteria are intended to: 1) support States as they develop their consolidated State plans, and 2) inform peer reviewer panels as they evaluate each consolidated State plan. This document outlines the required elements that an SEA must address in its State plan in order to fully meet the applicable statutory and regulatory requirements. If an SEA has provided insufficient information for peer reviewers to determine whether any requirement is fully addressed, peer reviewers should indicate that the SEA has not fully addressed that requirement and identify what

additional information or clarification may be needed. Note that responses to some elements are required only if the specific circumstances addressed in the question are applicable to the SEA submitting the consolidated State plan (e.g., if the SEA establishes an extended-year adjusted cohort graduation rate in addition to a four-year adjusted cohort graduation rate in item A.4.iii.b.2 below). For these particular questions, if the circumstances addressed in the question do not apply to the SEA, the SEA is not required to answer the question in order to fully address the statutory and regulatory requirements.

## **Instructions**

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

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

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

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

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

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

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

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

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

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

	Peer Response
Peer Analysis	Not applicable.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable (3 peer reviewers)

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

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

	Peer Response
Peer Analysis	<p>WV indicates that it defines a language to be of significant extent if it represents at least 50 percent of the total English learner student population in the state. This seems to be an unreasonably high bar. Based on data provided by the state, there were 1,335 Spanish speaking English learners (EL) in the state in 2016, representing 49 percent of the EL population. The state’s total EL population is surprisingly low. Nonetheless, WV indicates that it provides a Spanish translation version of its statewide mathematics assessments, and provides translated test instructions for its ELA and mathematics assessments and embedded translation glossaries for 10 different languages on its math tests (pp. 8-9).</p> <p>The state’s definition for languages other than English that are present to a significant extent in the participating student population is inclusive of all English learners in the State, and not only the participating student population (p. 8). This calculation results in a percentage less than that which identifies a language as present to a significant extent. The state may consider its definition and calculation from the participating student population.</p>
Strengths	WV provides native language support in Spanish on its statewide assessments, particularly the math assessments.

Weaknesses	The state's definition does not include at least the most populous language other than English spoken by the State's participating student population.
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Provide a definition of 'languages other than English that are present to a significant extent in the participating student population' that includes at least the state's most populous language other than English. Also, provide evidence of analyses performed on the types of students included in this population and their concentration at grade levels and within LEAs.  In determining which languages are present to a significant extent in the participating student population, describe how WV 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.

### 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?

	Peer Response
Peer Analysis	<p>WV indicates that it defines a language to be of significant extent if it represents at least 50 percent of the total English learner student population in the state. This seems to be an unreasonably high bar. Based on data provided by the state, there were 1,335 Spanish speaking English learners in the state in 2016, representing 49 percent of the EL population. The state's total EL population is surprisingly low.</p> <p>The SEA indicates that on its statewide assessment, the West Virginia General Summative Assessment (WVGSA) in mathematics it offers stacked Spanish translation of the items as well as embedded translation glossaries (Arabic, Cantonese, Filipino, Korean, Mandarin, Punjabi – East and West, Russian, Spanish, Ukrainian and Vietnamese) included on its state assessment, though it is unclear if these translations and glossaries are offered at all tested grade levels.</p> <p>The state also provides translated test directions on the WVGSA in ELA and mathematics (for oral delivery by bi-literate, trained adults) in a variety of languages: Arabic, Cantonese, Filipino, Korean, Mandarin, Punjabi – East and West, Russian, Ukrainian, Vietnamese, Haitian Creole, French, Hmong, Japanese, Somali, Dakota, Lakota and Yup'ik.</p>

Strengths	<p>Written translated test directions for ELA and mathematics for languages that include, but are not limited to, the top 6 most populous languages other than English.</p> <p>The written translated test directions, stacked translations and embedded translation glossaries increase access for ELs to demonstrate proficiency.</p>
Weaknesses	<p>While written translated directions for ELA and mathematics are available for some languages other than English, it is not clear that written translated test directions for ELA and mathematics are available for Spanish, the state's most populous language other than English.</p> <p>The referenced <i>Guidelines for Participation</i> that “identifies the language translations and glossaries that are available for specified languages and clarifies under which conditions the support may be provided” (p. 9) would be helpful as an appendix to the state's plan.</p>
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Specify the grades for which the stacked Spanish translation of the mathematics assessment is offered.

### 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?

	Peer Response
Peer Analysis	WV indicates that based on its definition, no additional academic assessments in other languages are needed at this time. However, due to its membership in an assessment consortium, it already happens to offer its mathematics assessment in a stacked translation format.
Strengths	N/A
Weaknesses	The rationale for not providing academic assessments in a language other than English in additional content areas such as ELA and science lacks detail.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers)

	<input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	NOTE: This response must comply with the definition provided in section A.3.i, including any future revision to the state’s definition of “languages other than English that are present to a significant extent in the participating student population”.

#### 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?

	Peer Response
Peer Analysis	WV states that it will monitor the language needs of its students, the growth of various language groups in its student population, consult with stakeholders including the English Learner Advisory Council, use those conversations to inform future language supports and translation requirements in RFPs for future academic assessments to provide additional language supports as needed (pp. 9-10).
Strengths	The state’s plan indicates that the state will include embedded language supports in future RFPs for assessment vendors.
Weaknesses	N/A
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or	NOTE: This response must comply with the definition provided in section A.3.i, including any future revision to the state’s definition of “languages other than English that are present to a significant extent in the participating student

clarification that an SEA must provide to fully meet this requirement	population”.
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**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?

	Peer Response
Peer Analysis	WV identifies the racial/ethnic subgroups it uses in its accountability system as being: Asian, Black or African American, Hispanic or Latino, Multi-Racial, Native American, Pacific Islander, and White.
Strengths	N/A
Weaknesses	N/A
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the 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?

	Peer Response
Peer Analysis	Not applicable.
Strengths	

Weaknesses	
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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)?

	Peer Response
Peer Analysis	Not applicable.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this	

requirement	
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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?

	Peer Response
Peer Analysis	WV indicates that it plans to use a minimum group size of 20 students for its accountability system; this is the same N-size the state has used since 2013 following analysis and stakeholder consultation.
Strengths	The state’s plan adequately provides context supporting the selection criteria of N-size (i.e. relative monolithic cultural diversity, decreasing student enrollment over the past 5 years, etc.) (p. 9). A minimum group size of 20 strikes a reasonable balance between holding schools accountable for student groups and statistical soundness.
Weaknesses	WV does not appear to include former English learners in its EL accountability subgroup results. Doing so would increase the number of schools with EL subgroups that would meet the minimum group size.  The reference to the historical decision-point of 2013 may not accurately reflect the needs of the state today and may no longer serve to effectively portray school performance through the timeline established by the long-term goals of this plan (2029-2030) (p. 15).
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	WV provides data regarding the number of schools held accountable for student groups with varying minimum N-sizes as evidence that its choice of 20 strikes a reasonable balance between accountability and statistical soundness, and also references a recent IES report on setting minimum n-sizes (p. 11). The state based its selection of N-size on its desire to maximize the number of subgroups included in its accountability system and provide clear and understandable data to stakeholders. In consideration of the small statewide student population and limited diversity in the state, the N-size selection would have significant impact on the validity of accountability determinations and decisions made at subgroup levels. The state believes that a minimum N of 20 would provide stable and reliable results and that it would ensure stakeholder confidence in long-term performance outcomes. Based on the data provided by the state (p.11), there does not appear to be a significant difference in the subgroups included in the accountability system when the minimum N is 15 vs. 20. In consideration of the greater volatility when lower N-sizes are used, it appears that 20 would be a statistically sound selection for this SEA’s minimum N.
Strengths	The SEA provided a clear analysis of the various options that it considered for potential N-sizes. A minimum group size of 20 strikes a reasonable balance between holding schools accountable for student groups and statistical soundness.
Weaknesses	The state’s plan does not sufficiently provide a convincing perspective on the selection of 20 as an N-size that will “provide more stable and reliable results and instill greater confidence in performance outcomes over time” (p. 11). The number of schools included in accountability would double for the multiple race subgroup and significantly increase for the English learner and Children with Disabilities subgroups if the state’s selection of N-size was 10 (p. 11).

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

	WV does not appear to include former English learners in its EL accountability subgroup results. Doing so would increase the number of schools with EL subgroups that would meet the minimum group size.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	The SEA's minimum N of 20 has been in use since 2013. WV indicates that it consulted multiple stakeholders regarding its minimum N-size to ascertain whether this number should be changed under the ESSA. Legislators, educators, parents, advocacy groups, were surveyed and public meetings were held in both large and small LEAs. According to the SEA, the majority supported retaining the minimum N at 20.
Strengths	The state's plan references current educational research on stability and confidence in N-sizes.
Weaknesses	The state plan's rationale for retaining its current N-count of 20 lacks justification that this criteria is best fit for the state's long-term plans for improvement over the next 12 years.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	WV describes three categories it considers to help protect privacy of individual students: disclosure avoidance, primary suppression, and complementary suppression (p. 12). The SEA recognizes that its state is uniquely homogenous, making the cloaking of student subgroup data more challenging, and it appears to be making concerted efforts to balance information-sharing with privacy – including exploring the potential for additional masking strategies in the future, beyond those already in place, including the use of top and bottom coding to protect the extreme ends of result distributions, which may be implemented in the near future...” (p. 12) as a disclosure avoidance tactic.
Strengths	WV appears to have considered privacy protection when establishing its minimum group sizes.
Weaknesses	The state’s plan could be strengthened by providing definitive evidence for the ways in which the state is “exploring additional strategies, including the use of top and bottom coding to protect the extreme ends of result distributions, which may be implemented in the near future...” (p. 12).
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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<sup>3</sup> 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?

	Peer Response
Peer Analysis	WV uses a minimum group size of 10 for public reporting purposes (p. 13).
Strengths	Setting a group size lower than 20 for reporting purposes allows the public to view results for a greater number of schools/subgroups than otherwise. 10 students is a common and reasonable choice of N-size to maintain privacy and statistical reliability.
Weaknesses	N/A
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	<p>WV places its discussion of long-term goals within a framework of economic growth for the state, indicating that it aims to increase student readiness for college and careers to strengthen the state’s workforce. WV states that it can map statewide assessment results to Lexile and Quantile frameworks developed by MetaMetrics, Inc., and that it plans to use Lexile/Quantile scores for its school-level academic achievement indicators and its long-term academic achievement goals. The state’s plan accounts for ensuring “comparable linking studies are conducted on any summative assessment adopted by the state in the future” (p. 14).</p> <p>The SEA proposes to set long term (14-year) academic achievement goals for all students as well as each subgroup, using 2015-16 data as the baseline and the 2029-2030 as the goal year. The ultimate goal is for each subgroup, as well as the “all students” subgroup, to achieve 80% of the possible academic performance points. According to the SEA, points would be awarded to students “for higher-levels of academic performance in ELA and mathematics, relative to grade-level, proficiency-equivalent, and college and career ready Lexile and Quartile bands”. (p.14, bottom). The state plans to assign a maximum of 125 points to each school/subgroup in ELA and math for its annual meaningful determination, and indicates that its long-term goal in these subject areas is for schools to reach 80% of the maximum number of points—100 points or more—by the year 2029-30 (pp. 13-15).</p> <p>This static number goal (as opposed to a ‘reduce by X percent’ goal) naturally results in a disparity in the amount of growth required of those groups that are already high-achieving (Asian, Pacific Islander) and, conversely, has the potential to be overly ambitious with other groups (SWD, Black or African American, etc.). For example, the ELA goal establishes the 12-year long-term goal for the Asian subgroup to improve by less than 1 percent (0.33 percent) in ELA and 3.41% in mathematics. In this example, the long-term goals are not ambitious.</p>
Strengths	<p>Lexile/Quantile scores purport to exist on a continuum that can be applied across grades and assessments, in essence creating a (somewhat) uniform scale for measuring proficiency and college and career readiness. The state has planned to connect its long-term goals with its assignment of points for the annual meaningful differentiation.</p>
Weaknesses	<p>Using Lexiles/Quantiles adds a layer of complexity to assessment and accountability reporting. Also, the data presented in Tables 2 and 3 (p. 14) raise questions about the relationship of the “Proficiency-Equivalent Lexile” and the “Grade-Level Band”, with the proficiency score being much higher than the grade-level band for certain grades, particularly in math. Although the state has set the same target for all student subgroups (80 percent of points/100 points) in its extended timeline, gaps for certain groups are likely to be insurmountable (e.g., children with disabilities, 46.69 percentage point gap). Conversely, goals for the Asian/Pacific Islander subgroup are not ambitious (0.33 percentage).</p> <p>In addition, the SEA is not clear as to how ‘points’ will be awarded. It is noted that they will be awarded for “higher levels of performance” relative to Grade-Level, Proficiency-Equivalent and College/Career Ready bands – but it is unclear from the state’s plan what the definition of “higher levels of performance” is, whether the awarding</p>

	of points is conjunctive criteria or if they judged independently of one another, and if extra points are awarded if scores surpass an expected performance level.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Ensure each subgroup (including Asian and Pacific Islanders) is sufficiently challenged by the long-term achievement goals in ELA and math.

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?

	Peer Response
Peer Analysis	WV has set annual incremental targets on a linear basis between the 2015-16 baseline year and 2029-30 for all students and individual subgroups. The progress is measured in percentage points gained, and each group is expected to achieve 80% of the points possible (100 out of the 125 possible points – see p.23) in both ELA and math by the goal year. The required progress is provided in Appendix A (p.91) for all groups.
Strengths	It appears that WV plans to use the same targets for both the state and individual schools.
Weaknesses	Annual gains for lower performing subgroups may not be realistic.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	Although the state has set the same target for all student subgroups (80 percent of points/100 points) in its extended timeline, gaps for certain groups are likely to be insurmountable (e.g., children with disabilities, 46.69 percentage point gap). A “gap-cutting” approach based on an individual group’s baseline performance might be more attainable (p 16).
Strengths	The state’s plan notably calls attention to the lowest performing subgroups required to make the greatest gains under its plan to achieve the state’s long-term goals.
Weaknesses	By setting the long-term goal at 80%, the Asian subgroup will not be required to make any substantial measurable progress over this 12-year period. Conversely, annual gains and long-term goals for lower performing subgroups may not be realistic.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

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

	Peer Response
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Peer Analysis	<p>The state’s plan maintains progressive momentum towards its current graduation rate goal of 90% by 2020, and increases the expectation for schools to post graduation rates of 95% by the end of its long-term plan for all students and subgroups by 2029-30, slightly more than 5 percentage points higher than the 2015-16 baseline rate for all students (pp. 16-17).</p> <p>Baseline data is provided for each subgroup, and in consideration of the state’s already-high graduation rate, the goal is ambitious for only a few subgroups (students with disabilities, economically disadvantaged and ‘multi-race’ students). The Pacific Islander subgroup, for example, already posts a 100 percent graduation rate and thus has no growth potential (and in fact, the goal would allow for regress of the subgroup), while the Asian subgroup graduates at a rate of 95 percent and the EL group at 92.7 percent.</p>
Strengths	The state has high graduation rates for all student groups: the lowest 2015-16 rate was 77% for students with disabilities. The state’s plan for all schools and subgroups of students to achieve 95% graduation rate is ambitious.
Weaknesses	The state does not identify graduation requirements that may exist in the state (e.g., passing statewide assessments, course grades), which would help contextualize the graduation rate data. The state’s present success in graduating such a high percentage of its students results in its high goal appearing ‘not so ambitious’ for many of its already-high-performing subgroups.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	WV indicates that it will use a 5-year cohort graduation rate in its annual meaningful differentiation of schools but does not plan to establish long-term goals for the indicator (p. 17).
Strengths	N/A
Weaknesses	N/A
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	WV has set annual incremental targets on a linear basis between the 2015-16 baseline year and 2029-30 for all students and individual subgroups. It does not appear that the state applies any consequences to a school/group that does not meet its target (pp. 16-17 and Appendix A).
Strengths	N/A
Weaknesses	Annual gains and long-term goals for lower performing subgroups may not be realistic.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to	

fully meet this requirement	
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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?

	Peer Response
Peer Analysis	Although the state has set the same target for all student subgroups (95 percent rate by 2029-30), gaps for certain groups are likely to be insurmountable (e.g., children with disabilities, 18 percentage point gap). A “gap-cutting” approach based on an individual group’s baseline performance might be more attainable (pp. 16-17).
Strengths	N/A
Weaknesses	Annual gains and long-term goals for lower performing subgroups may not be realistic.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

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

	Peer Response
Peer Analysis	WV has set the research-based goal of 80% of English learners <u>achieving</u> English language proficiency within six

	<p>years of first receiving EL services as well as interim targets toward the goal, and describes its plan to use results from the ELPA21 assessment to measure progress toward the goal. However, WV does not appear to have set a goal/targets for increases in the percentage of ELs <b>making progress</b> toward English proficiency (pp. 18-19).</p> <p>The state’s plan references the low percentage comprised by ELs in the total student population and indicates the recognition that many schools will not meet the minimum N-size of 20 for accountability purposes.</p>
Strengths	<p>WV has looked to research to set its English language proficiency goal. The state’s plan includes initial data analysis, along with data from its legacy assessment system to provide a generic estimate for percent of students assumed to reach English proficiency targets within 6 years of receiving services.</p>
Weaknesses	<p>WV does not appear to have set a goal/targets for increases in the percentage of ELs <b>making progress</b> toward English proficiency. The goal of 80% of ELs achieving proficiency within 6 years of ‘receiving EL services’ is somewhat ambitious, though in consideration of the 92% EL graduation rate the current level of achievement in this element (33.4%) is surprising.</p> <p>The SEA specifies that the targets are set for students “receiving EL services.” The state should clarify whether students whose parents waived direct services are included in these calculations.</p> <p>The state’s plan does not include baseline data, as it is unavailable at this time due to a recent shift in measurement instrument. In the absence of the most recent data, the state could have utilized legacy data and planned for adjustment as necessary pending more current data analysis from the newer measurement instrument.</p>
Did the SEA meet all requirements?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No (3 peer reviewers)</p>
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	<p>The state’s plan must identify and describe the long-term goal for increases in the percentage of English learners <b>making progress</b> in achieving English language proficiency, as measured by the statewide English language proficiency assessment, including baseline data, a description of the State-determined timeline for English learners to achieve English language proficiency, and definitive evidence that the long-term goal is ambitious.</p>

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

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

	Peer Response
Peer Analysis	No baseline or interim progress data were provided for this element.

Strengths	
Weaknesses	The state’s plan does not include a baseline school year from which the measures of interim progress will be calculated.
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Once the SEA sets its long-term goal for increases in the percentage of ELs making progress toward achieving English language proficiency and its timeline, it must also provide the interim progress goals toward that long-term goal.

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?

	Peer Response
Peer Analysis	The state’s plan counts EL students’ performance twice in the state’s calculation for the academic achievement indicator (i.e. EL’s are represented in both denominators, once for WVGSA ELA and once for ELPA21). It is not allowable to include the results of EL student performance on the ELP assessment in the academic achievement

indicator under ESEA section 1111.c.4.B.i.I.

WV proposes to create a proficiency-based index for its ELA/math academic achievement indicator that incorporates results from the general statewide assessments, the alternative assessment for students with significant cognitive disabilities, and the English language proficiency assessment. WV would assign 0.25 points for the lowest performance level, 0.5 points for the next level below proficiency (or equivalent), 1.0 points for proficiency, and 1.25 points for performance exceeding proficiency (college & career readiness). As described in the long-term goal section of the plan, the state has set a long-term goal of 80% of the maximum number of points: this equates to 100 points/proficient performance on the index. The point assignment skews high: for instance, a group of 100 students with 25 students in each performance category would achieve a score of 60 points/percent rather than 50 percent. In other words, **high performers can overcompensate for low performers given the proposed point assignment** (pp. 19-23).

The SEA includes 3 components in its Academic Achievement indicator and, though not explicitly stated, it appears to apply them consistently to all schools in all LEAs across the state.

WVGSA (p.21): The ELA and Math indicators are weighted the same and are based on the Lexile/Quartile scores that students in grades 3-8 and 11 achieve on the state content assessments. Student scores will fall into one of four bands and the band will determine the points awarded to a school based on that student's score – it is unclear, however, how this will be calculated for 6<sup>th</sup> grade Math scores, where the normally mid-range 'proficiency equivalent' (955Q) score falls beyond the top of the college and career ready band (800Q-950Q)).

DLM (p.22):

The second element in the Academic Achievement indicator includes students with significant cognitive disabilities who are assessed on the state's Dynamic Learning Maps, which is the state's alternate summative assessment. Similar to the academic content assessment, students' scores will fall into one of four bands and points will be awarded to the school based on the band within which a student's score falls.

ELPA21 (p.22):

ELs' scores on the ELPA21 will also be included in the Academic Achievement indicator, in consideration of its standing as a (form of) ELA assessment. This is not allowable under ESEA section 1111.c.4.B.i.I. The assessment is reliable, though it is not a valid measure of "ELA" performance, per se, but rather a measure of whether or not the student has acquired the language of certain content areas (ELA included) not the content of ELA.

The calculation description, however, (p.23) describes the grade levels included, but includes only those students "with a valid assessment result on the State's General Summative Assessment" and excludes students taking the

	<p>DLM.</p> <p>The plan does not indicate whether these scores will be disaggregated by Math, ELA and ELP, nor does the 95% participation rate appear to properly factor into the calculation or the business rules.</p>
Strengths	<p>WV aims to use an index that assigns differential credit to students based on their performance, rather than a pure proficiency threshold which could encourage schools to focus narrowly on students near the cut point, with a minimum goal of proficiency and additional credit assigned for “college and career ready” performance.</p> <p>The SEA has a novel plan in place to consider the academic performance levels necessary to reach college and career readiness in the later grades.</p>
Weaknesses	<p>On the state’s proposed index, high performers could potentially overcompensate for low performers. The state’s description of how points will be assigned (p. 23) is confusing and lacking detail. For example, the state’s plan indicates that “The aggregate number of performance points earned by a school on the academic achievement indicator will be derived by 1.) Multiplying the <b>percentage</b> of students scoring at each performance level by the point value assigned to that performance level (e.g., 0.25 points for the lowest performance level to 1.25 points for the highest performance level). Note that the <b>percentage</b> of students used in this calculation will represent the total number of students for which scores are available, or 95 percent of such students, whichever is greater” (p. 22). In this example, the term “percentage” should be replaced with the term “students.”</p> <p>The state’s plan awards “1.255 points to every student in the DLM performance level of Advanced” (p. 21), whereas the plan indicates 1.25 points awarded to students in the comparable categories on the other two instruments comprising this calculation (WVGSA and ELPA21).</p> <p>The state’s plan awards points across a performance index wherein students scoring below grade level and well below grade level receive the same credit, wherein the range for below grade level credit is substantially greater than the range for above college and career ready credit. Additionally, the 95% participation requirement is not clearly articulated for the all student or subgroup level.</p>
Did the SEA meet all requirements?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No (3 peer reviewers)</p>
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	<p>Adjust the calculation for the performance index such that high performers do not overcompensate for low performers in the state’s accountability system.</p> <p>Describe the state’s rationale for awarding “1.255 points to every student in the DLM performance level of Advanced” (pp. 21-22), whereas the plan indicates 1.25 points awarded to students in the comparable categories on the other two instruments comprising this calculation (WVGSA and ELPA21) as described in the plan. Alternatively, if 1.255 is a typographical error, please correct.</p>

	Affirm the participation of at least 95 percent of all students as well as each student subgroup and review its business rules for the calculation of this element in order to ensure that full student participation is encouraged in the accountability system.
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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?

	Peer Response
Peer Analysis	<p>The state’s plan describes the process of using the state’s interim assessment tool or a locally selected state-approved benchmark assessment along with an electronic growth planner. WV proposes to use district benchmark assessments that have been mapped to Lexile/Quantile scales as a measure of academic progress for elementary and middle schools. This approach would apparently require the state to approve assessments used by districts, and for districts to implement the assessments at both the beginning and end of the year to be able to take advantage of the measure. WV does not provide data on the number of districts that currently use approvable assessments, but proposes to implement its approach first with ELA in 2017-18 then with math in 2018-19. The plan accounts for the delayed inclusion of mathematics scores by one year to allow for linking studies.</p> <p>The SEA appears to have an acceptable means of assuring a 95% minimum participation or calculation that includes a minimum of 95% of FAY students in this element.</p>
Strengths	The state’s plan allows for local decision-making on the instrument best fit for LEA populations. The plan incorporates the same FAY status criteria as the academic achievement indicator, which ensures the student

	population for academic achievement indicator and the other academic indicator remains the same.
Weaknesses	<p>WV did not provide sufficient detail for an accurate evaluation of its plans for integrating the local assessment results into the calculation. Basing this indicator on additional assessments would require additional student testing and, potentially, additional cost to districts.</p> <p>The selection of varied measurement instruments reduces the comparability. The state’s plan does not clearly articulate that FAY criteria for this indicator does not disproportionately exclude the transient population and/or other subgroups of students (e.g. students moving from one district within the school year to another district that selected a different benchmark assessment).</p> <p>This indicator is the sole academic indicator for K-1 and K-2 schools as described in the state’s plan (pp. 36-37), which further establishes the need for strong reliability of the measurement instrument, including secure and valid test administration. The state’s plan would be strengthened with a comparison of student performance on WVGSA standardized assessments with student performance on locally-selected and administered benchmark assessment to potentially flag test security anomalies (i.e. inverse correlation between state and local scores).</p>
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	<p>The state described its plan to include additional high school indicators: on track to graduation, and post-secondary achievement, which does not apply to this section (pp. 23-26). Rather, the on track to graduation, and post-secondary achievement may be included as a School Quality and Student Success indicator.</p> <p>Describe the Other Academic indicator to ensure the valid implementation of this measurement, including</p> <ul style="list-style-type: none"> <li>• Definitive evidence on the validity and reliability of the various benchmark assessments that the state has already psychometrically linked with the Lexile and aims to link with the Quantile Frameworks for ELA and mathematics (p. 23)</li> <li>• Describe the state’s approval criteria for the locally administered assessment. Describe the state’s criteria to ensure test security for the purpose of test score validity (i.e. teachers do not have access to test items in advance of the administration, all students receive equitable time and appropriate modifications and accommodations, etc.), and</li> <li>• Comparable application within all LEAs in the state.</li> </ul>

#### 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?

	Peer Response
Peer Analysis	<p>WV proposes to use both the 4- and 5-year graduation rates for this indicator (p. 27), though the SEA does not specify that it applies the graduation rate indicator consistently across all LEAs in the state.</p> <p>For students determined by an IEP “to be unable, even with extended learning opportunities and significant instructional accommodations, to meet State and County standard graduation requirements”, an alternate diploma track (aligned to alternate standards) will be offered. These students will initially be included in their 9<sup>th</sup> grade enrolling cohort (4 year graduation expectation), but if they do not graduate within 4 years, they will be moved to the next year’s graduation cohort until which time they graduate OR reach the age of 21.</p>
Strengths	N/A
Weaknesses	The state’s approach to including students who are on an alternate diploma track in their graduation rate calculation is problematic. It proposes to remove students who do not graduate on time from their original cohort and places them in another. The state’s plan could be strengthened by including a description of the qualifications necessary for students to be allowed to work toward an alternate diploma.
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3 peer reviewers)
If no, describe the	Adjust the graduation rate calculation to ensure that students on an alternate diploma track who fail to

specific information or clarification that an SEA must provide to fully meet this requirement	graduate on time (i.e. in their initial cohort) are not removed from the initial cohort and placed in subsequent cohorts.  Affirm that the graduation rate indicator is applied consistently across all LEAs in the state.
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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?

	Peer Response
Peer Analysis	<p>WV proposes to use the ELPA21 assessment for this indicator, with proficiency in English measured by performance of level 4 or above (“Early Advanced” or “Advanced”) on each of the four ELPA21 domains. It is unclear from the state’s description specifically how it plans to design and use this indicator (p. 28). The SEA has not set a baseline or targets for schools and districts.</p> <p>Scores run from Level 1 to Level 5, and a student who scores at least a Level 4 in <b>all four</b> domains will be exited from the program and will not be assessed on the ELPA the subsequent year. Progress will be measured by students’ movement from Level 1 to Level 2, Level 2 to Level 3, (ELs who test at Level 3 are permitted to remain at Level 3 for 3 years total) then Level 3 to Level 4. Students that progress at this rate, on each domain, would be assured to meet the “full” proficiency goal within the SEA’s six-year timeline. ELs who score at a Level 4 or 5 on a domain are not provided subsequent-year progress goals, nor is any note made concerning the fact that the EL may obtain a lower score in a particular domain (in a subsequent test administration); no provision is made for such a scenario. It is unclear whether the SEA is banking scores once a student achieves a 4 or 5 in a domain.</p> <p>The Progress in ELP indicator is not included as an independent indicator, with its own weight, in the SEA’s accountability system. (p.34). The SEA explains that this is due to the fact that the N for ELs is so low statewide that this indicator would only apply to a few LEAs.</p>
Strengths	ELPA21 is a consortia-based test that has been developed by assessment experts from multiple states across

	multiple years.
Weaknesses	<p>It is unclear from the state’s description specifically how it plans to design and use this indicator. The indicator does not consistently measure ‘progress’ in ELP (since remaining in “Level 3” does not constitute ‘progress’) because it does not consider more discrete levels of measurement (such as scale scores) in its system. In addition, the indicator fails to recognize that student scores may regress from one year to the next, and that situation is not accounted for in the system, as described. As such, this does not appear to be a valid or reliable measure of progress in ELP.</p> <p>The state’s plan lacks definitive evidence for the validity and reliability of the measurement instrument for this state.</p>
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Provide additional details about the state’s proposal, including how the state plans to assign credit to schools for this indicator. Affirm that progress is measurable year-over-year (such as progress WITHIN Level 3) and clarify how points will be assigned to students who regress in a particular domain, if applicable. The state’s plan must include definitive evidence for the validity and reliability of the measurement instrument.

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?

	Peer Response
Peer Analysis	<p>The state’s plan describes an early warning system utilized by the state in support of LEAs to monitor student success in attendance, behavior, and course credit (p. 28). WV proposes to create and use two indicators of School Quality or Student Success: attendance and behavior. For attendance, the state’s goal is for each student to attend school at least 90 percent of available instructional days. The state’s proposed method of calculating the indicator would only include students enrolled for at least 135 days rather than all students enrolled at the beginning of the school year. For behavior, the state proposes to assign credit for the percentage of students in each school who receive no out-of-school suspensions within a school year. As with the attendance indicator, the state only plans to include in the indicator students enrolled for at least 135 days. WV also plans to exempt some cases from the calculation: it appears that these are cases in which the student is deemed to present a danger to others (pp. 28-31).</p> <p>The School Quality Indicator will incorporate two factors: Attendance and Behavior.</p> <p><u>Attendance</u>  A measure of attendance for students in Kindergarten through 12<sup>th</sup> grade, with the goal set at 90% of instructional days attended. FAY students comprise the denominator and calculations would be made for those students whose N was 20 or more. Schools would be awarded 1.0 point for each student who attended 90% or more instructional days of the school year, not including out-of-school suspensions (which are addressed in the second measure).</p> <p>Based on the data provided, it appears that it would differentiate among schools and that it is a comparable, valid and reliable measure that would be calculated consistently and can be disaggregated for each subgroup, although the SEA does not note whether it plans to do so.</p> <p>The second measure for this indicator is one of behavior: the percent of Pre-K through 12<sup>th</sup> grade students that received zero out-of-school suspensions within a school year. The goal is to incentivize schools to use alternative disciplinary methods that keep students engaged in the instruction. 1.0 point would be awarded to each student with zero out-of-school suspensions, and the denominator would include all Pre-K – 12<sup>th</sup> grade FAY students, so long as the N was 20 or more. Students who would not be included in this calculation are those suspended out of school due to a “Level 3” or “Level 4” infraction (i.e. dangerous or pursuant to the Safe Schools Act). Considering the contextual description provided by the state’s plan, the measure for behavior to be included in the School Quality Indicator may not adequately inform the indicator for meaningful differentiation in school performance. The measure, “the percent of students in each school that received zero out-of-school suspensions within a school year” (p. 29) is easily susceptible to and influenced by non-student factors (i.e. data manipulation).</p> <p><u>On-track to graduation and post-secondary achievement (from section A.4.iv.b)</u>  The calculation on p. 26, Step 5 does not appear to include all students who could potentially earn credit when calculating the total points (i.e. all grade 9 and 10 students).</p>

Strengths	<p>The indicator is a clear, easily understandable measure on which school and district leadership should be capable of positively impacting. The state’s plan includes two factors for measuring School Quality. The state plans to use the same indicators for all grades/grade spans, and to address areas it has previously focused on with its districts.</p> <p><u>On-track to graduation and post-secondary achievement (from section A.4.iv.b)</u>  It is reasonable to include on-track to graduation for high school students. The state is commended for attempting to provide credit to grade 12 students who are demonstrating preparedness for post-secondary achievement through multiple paths (IB, AP, industry certification).</p>
Weaknesses	<p>Though each element does differentiate among schools, in the attendance elements specifically, most of the schools seem skewed to the high side of the scale. This may make it difficult for the SEA to tease out actual meaningful differences between schools. It might be worthwhile for the SEA to address whether this information would be disaggregated and reported by subgroup and grade level.</p> <p>As described by the state’s plan, there is risk that, as currently planned for use, the behavior measure may influence a negative outcome on academic achievement. If used, the state’s plan should include analysis for unusual gains in zero out-of-suspensions for potential data manipulation.</p> <p><u>On-track to graduation and post-secondary achievement (from section A.4.iv.b)</u>  The calculation on p. 26, Step 5 does not appear to include all students who could potentially earn credit when calculating the total points (i.e. all grade 9 and 10 students). Further, it is not clear that every student in the state has access to these opportunities.</p>
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	<p><u>On-track to graduation and post-secondary achievement (from section A.4.iv.b)</u>  The state’s plan for On-track to graduation and post-secondary achievement (section A.4.iv.b) should be included here.</p> <p>The state’s plan should correct the calculation on p. 26, Step 5 to include all students who could potentially earn credit when calculating the total points (i.e. all grade 9 and 10 students).</p>

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

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

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

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

	Peer Response
Peer Analysis	<p>WV proposes to use a dashboard approach to its annual meaningful differentiation, assigning color codes and checkmarks to each indicator rather than calculating an overall summative rating. The SEA outlines the 5 required indicators (Academic Achievement, Other Academic, Grad Rate, Progress in ELP and Student Success) in its narrative (p. 31-32) about AMD, however its rubric (p.33) fails to include Progress in ELP – and it adds an “Other Academic” indicator for High Schools (“on track to graduation” and “post-secondary achievement”). Additionally, though the SEA proposes a plan for the Other Academic indicator (district-administered benchmark tests), it does not include any data or performance level classifications related to this indicator.</p> <p>The state indicates that it established thresholds for four different performance levels based (in some cases) on its long-term goals. There is no indication that the state plans to average data across years; with small cell sizes this may lead to variable year-to-year results. WV proposes no separate indicator of English language proficiency. The SEA explains that the N size for ELs is too low for there to be an independent Progress in ELP indicator. No information is provided regarding how schools with EL numbers below the minimum N would have system weights adjusted. (pp. 31-35). No commentary related to the subgroup calculations or reporting was provided, nor did the matrices appear to include disaggregation by subgroup.</p>
Strengths	The state aims to overcome concerns about oversimplification in state accountability ratings by providing a more nuanced approach to describing school performance.
Weaknesses	The state’s proposed approach is visually challenging, and makes a quick assessment of school performance challenging. The state does not yet have sufficient data to establish benchmarks for its proposed indicator of elementary/middle school progress. The state’s plan lacks a description of the State’s system of annual meaningful differentiation that includes the performance of each subgroup of students on each of the indicators in the State’s accountability system. It would be helpful to see the statewide data analysis for each of the proposed indicators, since the “Emerging” band appears wider in some of the elements as compared to the Accomplished and Distinguished bands. A review of the data could help provide rationale for decision-making by the SEA.
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Provide additional details regarding the state’s proposal regarding English learner results. The Progress in ELP indicator must a) measure student progress toward English proficiency, b) be an independent indicator outside of the ELA component of Academic Achievement, and c) receive substantial weight in the AMD system. Clarify how the ELP indicator (Tables 10 and 11, p. 36) is included as a separate element and rectify the narrative on p.34, which specifies that it is not to be so. Clarify how the system will account for and modify indicator weights for schools whose EL N-size is too small to calculate.

	<p>The state’s plan must include a description of the State’s system of annual meaningful differentiation that includes the performance each subgroup of students on each of the indicators in the State’s accountability system</p> <p>Explain the system of differentiating schools based on the Other Academic Indicator (for non-High Schools) and its performance level definitions.</p>
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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?

	Peer Response
Peer Analysis	WV proposes to use a dashboard approach to its annual meaningful differentiation, with no overall summative rating assigned. As such, the state has not assigned weights to each indicator. In responding to this item, however, WV indicates that each indicator (or indicator element) is weighted equally. Because the state only proposes two school quality and student success indicators, these indicators naturally have less weight as compared to the other indicators combined. At the ES/MS levels, Academic Achievement and the Other Academic Indicator each are valued at approximately 28 percent. Student Success is weighted at 29 percent. At the HS level, Academic Achievement and Graduation Rate are each weighted at 22 percent, the SEA’s “Academic Progress” indicator for HS is 22 percent and Student Success is 22 percent (pp. 35-36). Based on this description, Progress in ELP does not receive substantial individual weight. In the aggregate, however, the academic indicators are weighted much greater than the Student Success indicators.
Strengths	WV’s “natural” weighting approach is straightforward and easy to understand.
Weaknesses	The state does not yet have sufficient data to establish benchmarks for its proposed indicator of elementary/middle school progress. The state’s plan lacks a description of how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students. The state’s plan does not include progress towards proficiency for EL as a separate indicator that receives substantial weight.
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3 peer reviewers)
If no, describe the	The SEA must include progress towards proficiency for EL as a separate indicator that receives substantial weight

specific information or clarification that an SEA must provide to fully meet this requirement	relative to the other indicators in its system of AMD.  The state’s plan must include a description of how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students.
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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?

	Peer Response
Peer Analysis	WV proposes a slightly revised approach to its annual meaningful differentiation for K-1 and K-2 schools, as all indicators are not available to these schools. The state will use available data/indicators, resulting in a different natural weighting than for other elementary and middle schools. The state’s plan includes substantially greater weight (weighted at 40 percent) for the Student Success indicator for these schools (K-1 and K-2) than for all other schools (29 percent). Considering the low population of EL students in the state, this methodology is likely to be more greatly influenced by the Other Academic and School Success Indicators (e.g. Student Success = 40 percent of the weight, while Academic Progress and Progress in ELP = 60 percent of the total weight) (p. 37). The state’s plan provides a limited description of the annual meaningful differentiation for K-1 and K-2 schools.
Strengths	The state appears to have sufficient assessment data for K-1 and K-2 schools to be able to generate an annual meaningful differentiation without relying on attribution, performance of graduates, or some other approach.
Weaknesses	The weighting of the Academic Progress indicator (29 percent) further establishes the necessity for validity and reliability (including test security) of the district-selected benchmark assessments. Without an Academic Indicator, the indicators comprising the performance rating for these schools may not provide an accurate depiction of school-based factors impacting school performance.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this	

requirement	
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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)?

	Peer Response
Peer Analysis	Beginning in the 2018-19 school year, the SEA proposes to initially review each of its accountability indicators in order to determine schools selected for Comprehensive Support and Improvement (CSI). Any Title I school receiving “Unsatisfactory” on all indicators will be identified as CSI. If this amounts to less than 5 percent of Title I schools, a second review is undertaken. The second review selects for CSI those Title I schools that receive “Unsatisfactory” on Academic Achievement and Academic Progress, though it is unclear how this is quantified for ES/MS, and Progress in ELP; and either Unsatisfactory or Emerging in Student Success. Compared to the 1 <sup>st</sup> Review, Grad Rate will not be considered in this review and Student Success of “Emerging” will qualify a school for identification. If the sum of these schools plus those identified in the 1 <sup>st</sup> review is still less than 5 percent of Title I schools, a 3 <sup>rd</sup> review is undertaken. The 3 <sup>rd</sup> review will identify for CSI those Title I schools that demonstrate Unsatisfactory performance on Academic Achievement, Academic Progress and Progress in ELP. Should this fail to capture the lowest performing 5% of Title I schools, any additional schools needed to bridge the gap will be selected based “on the lowest actual rates on all indicator measures”(p. 37); however, it is unclear the methodology by which the state will identify these schools (i.e. using actual scores per indicator versus performance levels/categories wherein the SEA has indicated that it will not sum the scores across indicators) (pp. 37-38).
Strengths	The state aims to align its annual meaningful differentiation process with its identification of comprehensive support and improvement schools. The multi-step process offers a graduated approach to identification for support.
Weaknesses	It is unclear what the state will do if and when the state’s proposed identification process does not result in at least 5 percent of the lowest performing schools identified (i.e. It is unclear after Step 3, how the state plans to sum actual scores per indicator versus performance levels/categories wherein the SEA has indicated that it will not sum the scores across indicators). It is also unclear what the state will do if and when more than five percent of schools meet the proposed identification criteria according to the state’s identification process. Not using multiple years of data to identify low performing schools raises questions about year-to-year variability and persistent low performance.

	Graduation Rate is not included as an indicator in Steps 2 and 3
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	<p>Clarify the methodology by which the state will identify schools if and when 5 percent have not been identified after Step 3 (i.e. using actual scores per indicator versus performance levels/categories wherein the SEA has indicated that it will not sum the scores across indicators).</p> <p>Clarify the methodology by which the state will identify schools if and when greater than five percent of schools meet the proposed identification criteria in Step 1 according to the state’s identification process (i.e. how does the state determine which schools receive support).</p> <p>Indicate that Graduation Rate is included as an indicator in Steps 2 and 3.</p>

**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)?

	Peer Response
Peer Analysis	WV plans to identify any school with a four-year graduation rate of less 67 percent in the aggregate for comprehensive support and improvement based on graduations from the 2016-17 school year. All high schools will be included in this calculation. The SEA does not specify that it is adjusting its graduation rate cohort (fatalities, unenrollments, etc.) for this calculation, however it states that for the past 2 school years (14-15 and 15-16), at the state level, no subgroup graduation rate was lower than 67 percent (p. 38).
Strengths	N/A
Weaknesses	The state does not plan to identify schools that have low graduation rates for subgroups. Not using multiple years of data to identify low performing schools raises questions about year-to-year variability and persistent graduation rate problems.

Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

A.4.vi.c: Comprehensive Support and Improvement Schools—Additional Targeted Support Not Exiting Such Status

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

	Peer Response
Peer Analysis	<p>WV proposes to identify schools in this category when they have been identified for additional targeted support but have not met state-defined exit criteria for three years (p. 38).</p> <p>The SEA will first identify schools for Additional Targeted Support in the 2018-19 school year, which would be considered “Year 1” of support and, after 3 years of receiving the support, the school will exit this status if it:</p> <ol style="list-style-type: none"> <li>1. No longer falls within the lowest performing 5 percent of Title I schools, and demonstrates an ACGR of 67 percent or more; AND</li> <li>2. “subgroups show improvement in the indicator(s)” that led to the school’s initial identification as an Additional Targeted Support school; AND</li> <li>3. The LEA and school submit SEA-specified assurances re: governance and structures in the Consolidated Application</li> </ol> <p>Should a school not exit status, it will be identified as a CSI school. The first year that this procedure will take place is 2021-2022 (three years after the initial 2018-19 identification of Additional Targeted Support schools).</p>
Strengths	A three-year timeline aligns with the state’s planned timeline for identification of comprehensive support schools.
Weaknesses	N/A

Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	WV proposes to identify schools for comprehensive support and improvement every three years beginning in 2018-19 (p. 39).
Strengths	The state’s plan includes a table with the planned academic years in which identification is scheduled through its 12-year plan for continuous improvement (p. 39).
Weaknesses	Not using multiple years of data to identify low performing schools raises questions about year-to-year variability and persistent low performance.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	WV proposes to use three years of data to identify schools with consistently underperforming subgroups, using “unsatisfactory” performance on all accountability measures for one or more subgroups. The SEA defines “consistently underperforming” as any subgroup that demonstrates “Unsatisfactory” performance on all accountability measures for three consecutive academic years. This will be an annual identification process and will apply to all schools (apart from those already identified for CSI) (p. 39).
Strengths	The state proposes to use multiple years of data for this identification.
Weaknesses	<p>The state does not describe its timeline for identifying schools in this category, but based on the definition provided, presumably the first identification of schools would not occur until 2022-23.</p> <p>The plan lacks ELP indicator.</p> <p>Historical data would be valuable in order to complete this review, as it is unknown whether this protocol actually results in the identification of any schools based on consistent subgroup underperformance.</p> <p>In order to receive an “unsatisfactory” in the Behavior (Student Success) indicator, a school’s data must show that more than 20 percent of its students received an OSS (p.34). The SEA data summary (p.30) indicates that the highest OSS rate posted by a school is 31.22% percent (with a median of 4.78). According to the data provided by the SEA, it seems that an extremely small number of schools would be identified because of their consistently underperforming subgroups. . A subgroup exhibiting 3 consecutive years of universally unsatisfactory performance is evidence of a fully failed elementary (3<sup>rd</sup>, 4<sup>th</sup>, 5<sup>th</sup>) or middle school (6<sup>th</sup>, 7<sup>th</sup>, 8<sup>th</sup>) career. It seems that interventions should take place earlier than proposed. Additionally, improvement in one indicator – say, the presently-unrated “Academic Progress”, to “Emerging” in a single year – could easily revert back to Unsatisfactory the following year, thus absolving a school from this designation, while on the whole it still fails to improve its student subgroup performance.</p>
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this	<p>Provide data to support the fact that this procedure actually identifies schools with consistently underperforming subgroups.</p> <p>Include EL as a separate indicator.</p>

requirement	
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**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?

	Peer Response
Peer Analysis	<p>WV proposes to first identify schools for additional targeted support in 2018-19, and continue identification once every three years after that. The state appears to indicate that it will identify such schools by applying the same approach it proposes to use to identify schools for comprehensive support, but at the subgroup level. However, the state provides insufficient detail in its response to this item to evaluate whether its plan meets ESSA requirements. For instance, it is not clear whether the state plans to cap the number of identified schools at 5 percent. It is unclear the frequency at which steps would be used for selecting the schools for Additional Targeted Support. Page 39.</p> <p>Schools to be included in this identification process would be any school not already identified as CSI or TSI, and the review would be performed at the subgroup level using the procedures by which schools would be identified for CSI. The CSI identification process has up to 4 steps in order to ensure 5 percent of Title I schools are selected for support.</p>
Strengths	N/A
Weaknesses	The state provides insufficient detail in its response to this item.
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Provide additional detail regarding the state’s planned approach to identifying schools for additional targeted support and affirm that schools would actually be identified for Additional Targeted Support under the SEA’s identification process, including the steps of the CSI identification process to be followed in the “identification due to subgroup performance” process.

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?

	Peer Response
Peer Analysis	Not applicable.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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)?

	Peer Response
Peer Analysis	<p>WV plans to hold schools accountable for participation of at least 95 percent of students by using the figure representing 95 percent of full-year enrollment in the denominator when calculating academic achievement in ELA and math, when less than 95 percent of students enrolled for the full year are assessed. It is unclear whether it plans to apply this approach to subgroup determinations (p. 40).</p> <p>The SEA’s description on p.40 misaligns with that on p.23 (Academic Achievement calculation). The definition on page 23 specifies that ELA and Math will be calculated separately, however the numerator on p.23 is noted as being</p>

	the product of a performance level’s points (.25, .5, 1.0, or 1.25) and the percentage of students who performed at that level. The percentage of students represented will be “the total number of students for which scores are available” or 95 percent, whichever is greater. On p. 40, the numerator is described instead as the sum of FAY students’ achievement points (calculates the same as the product of points and percent achieving those points) while the denominator represents “95 percent of FAY students enrolled or the number of FAY students assessed, whichever is greater.” The use of “the total number of students for which scores are available” might well differ from “the number of FAY students assessed” – which would result in two different Achievement scores. The incentive to assess a minimum of 95 percent of FAY students lies in the quotient score being diminished, as the cumulative points will be divided by 0.95 despite the percentage of students tested and contributing to the dividend.
Strengths	The process does negatively impact those schools that do not meet the 95 percent participation rate.
Weaknesses	Overall, the state’s proposed approach minimizes consequences for low participation and could lead to schools intentionally excluding certain students from state testing. The business rules related to the students included in the denominator are unclear, and apart from the impact on the Achievement score (28 percent of the total score at ES/MS; 22% of the total score at HS), nothing in the system explicitly mandates a minimum of 95 percent student participation on assessments.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (2 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA should clarify its business rules for the denominator in the calculation of the Academic Achievement indicator, ensuring that the description on p.23 aligns with that on p.40, which ensures the denominator represents “95 percent of FAY students enrolled or the number of FAY students assessed, whichever is greater.”

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)?

Peer Response
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Peer Analysis	<p>WV proposes to allow schools to exit comprehensive support status after three years if the schools do not meet the criteria for new identification, and the schools’ “accountability results show improvement (three-year average) in the indicator(s) that led to the school’s identification.” The state would also require certain assurances from the school (p. 40).</p> <p>It is not clear whether this exit criteria ensures that the school no longer meets the criteria under which the school was identified. It is possible that the 5 percent is not reached when the number of Step 1 schools is tallied. Then, if a school is identified in Step 2 (with scores of Unsatisfactory in Academic Achievement and Academic Progress, and Unsatisfactory/Emerging in Student Success) that school might ‘improve’ its 3-year average score in those indicators without moving them out of those performance levels. Therefore, it was identified because of a need to reach 5 percent and having received certain performance levels. The next cycle, however, may fulfill the 5% with the Step 1 schools – not needing to consider Step 2 at all. In this situation, our “Step 2-identified school” will not have exited because it overcame the criteria under which it was identified, but rather due to an exit criteria different from the entrance criteria (i.e. initially identified due to performance level and need to apply Step 2 to meet 5 percent, but exited due to averaged numerical score increase and no need to apply Step 2 to reach the 5 percent).</p> <p>The SEA may wish to provide more detail around #2 in its decision rules, concerning what exactly constitutes “improvement” and it may wish to name outright the specific indicators that must ‘improve’ for schools identified in CSI Step 1, Step 2, Step 3, or Step 4. Doing so may head off difficult conversations in the future with schools that fail to exit status.</p>
Strengths	N/A
Weaknesses	The state’s description of required improvement lacks sufficient specificity to be able to effectively evaluate the state’s plan. Further, the state’s proposed exit criteria appear to be solely quantitative, and not to take into account qualitative information about the school’s likelihood to remain on a positive trajectory.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (2 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Provide additional details regarding the improvement required for exit and/or revise exit criteria to allow a more robust evaluation than currently described. Affirm that schools exited from status would no longer meet the designation criteria under which they were originally identified.

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)?

	Peer Response
Peer Analysis	<p>As with the criteria proposed for exit from comprehensive support status, the state’s proposed criteria that would allow schools to exit targeted support status lack sufficient specificity to be effectively evaluated. WV proposes that such schools no longer meet identification criteria for “comprehensive support and improvement schools” (sic?), demonstrate improvement in the indicators that led to the school’s identification, and submit certain assurances (p. 41).</p> <p>The SEA will exit schools from the Additional Targeted Support (identified due to poor subgroup performance) similar to the CSI exit protocol, via a three-part review. 1. If the school does not fall within the range of the newly identified CSI schools; 2. The school’s accountability results for subgroups show improvement in the indicators that led to initial designation (It is unclear if this references just that particular subgroup, or all subgroups); and 3. The school and LEA submit assurances in the Consolidated Application committing to certain management and school structure requirements related to subgroup services. It is unclear if these assurances target initiatives for the specific ‘poorly performing’ subgroup (i.e. the subgroup that led to the identification), or as it appears to be written, all subgroups.</p> <p>It is not clear whether this exit criteria ensures that the subgroup no longer meets the criteria under which the school was identified. Unlike exit from CSI (which specifies a review of the 3-year average accountability score), to exit Additional Targeted Support, schools need to show “improvement” in the indicators that led to designation, though the meaning of “improvement” is unclear.</p>
Strengths	N/A
Weaknesses	<p>The state’s plan provides a limited description of the required exit criteria.</p> <p>It is unclear what constitutes “improvement” in this indicator (p. 41). It is also unclear whether schools that meet the exit criteria must no longer meet the criteria under which the school was initially identified for Additional Targeted Support. For example, if a school was identified under Step 2, must the school exit after improvement for</p>

	those indicators in that step?.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (2 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	<p>Provide additional details regarding the improvement required for exit and/or revise exit criteria.</p> <p>Define and describe what constitutes “improvement”(clarify higher performance level) in this indicator and ensure that schools that meet this definition no longer meet the criteria under which the school was initially identified for Additional Targeted Support.</p>

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

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

	Peer Response
Peer Analysis	WV proposes additional actions for schools identified for comprehensive support and improvement that appear weak; the actions primarily comprise additional and/or revised planning. Further, the state suggests that rather than being state-determined actions, such additional steps would be determined by both the school’s LEA and the state (pp. 41-42).
Strengths	
Weaknesses	<p>The state’s plan is not clear on the agency that will conduct the “review of the district and school annual strategic plan” (p. 41), and the plan does not clearly describe how this review facilitates more rigorous interventions. The plan lacks specificity on the “additional targeted goals, performance measures, strategies and action steps” (p.41) that will be developed to address the areas of continued deficiency. The plan lacks specificity on the accreditation and diagnostic review using the Standards for High Quality Schools. Additional information describing these reviews, including instruments and/or tools, would strengthen the state’s plan.</p> <p>This section introduces the term “statistical neighbors” (pp. 41-42). The plan should include a definition here or a reference to the definition stated on p. 46.</p>
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (2 peer reviewers)
If no, describe the	Clearly describe the State-determined action steps required for schools identified to receive more rigorous

specific information or clarification that an SEA must provide to fully meet this requirement	interventions that are likely to result in more fundamental reform/improvement for the state’s lowest performing schools.
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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?

	Peer Response
Peer Analysis	<p>WV proposes to monitor resource allocation in identified schools/districts using its ESEA consolidated application and “other included funding applications”, and address inequities through “blending funds across existing resources.” It is unclear what opportunities for “blending funds” the state anticipates; while some flexibility exists under federal rules, there are also substantial restrictions on fund use. Further, the state’s approach does not appear to address the overwhelming majority of school-level funding, which presumably derives from local sources (p. 42).</p> <p>The SEA indicates that any inequities discovered in CSI schools’ resources will be addressed by supporting LEAs in blending funds. Prioritizing needs and providing platforms through which schools will tie funds to goals appears to also be an SEA support strategy. In addition, LEA budgets and resource allocation to schools will be closely monitored by SEA staff prior to budget approvals.</p> <p>The SEA does not address any specific or individualized activities/reviews that will take place for LEAs with an inordinate number of CSI or TSI schools.</p>
Strengths	WV indicates that it intends to focus on resource allocation, albeit on a small scale, when considering the challenges its low performing schools face.
Weaknesses	The state’s plan lacks a description of the types of resource allocation reviews it will specifically perform for/provide to LEAs due to their significant numbers/percentages of identified support schools. .
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
If no, describe the specific information or clarification that an SEA must provide to	Describe the types of resource allocation reviews the state will specifically perform for/provide to LEAs due to their significant numbers/percentages of identified support schools.

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

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

Peer Analysis	Peer Response
Peer Analysis	<p>WV has established and implemented a statewide system for supporting low performing schools and districts, bolstered by written state policy, consistency over time, and allocation of state human resources. The state’s proposed plan for monitoring and providing assistance to comprehensive support schools appears to be both wide-ranging and specific, focused on identifying and supporting specific areas for improvement. Interestingly, the state proposes to consult with local superintendents and federal program administrators when determining its approach to calculating federal school improvement allocations (pp. 42-48).</p> <p>Technical assistance from the SEA to LEAs serving significant numbers/percentages of CSI schools includes the use of school improvement coordinators (SIC) liaising with the LEA and leading diagnostic processes (as part of the Cycle of Continuous Improvement model). These SICs partner with the LEA school improvement staff, mentor and support LEA leadership teams, and assist local staff in addressing their areas of need (based on accountability, survey results and root cause analyses) by gradually supporting the implementation of data-based initiatives grounded in best practices.</p> <p>This process takes place over three years, in which Year 1 of identification is considered the Planning and Diagnostic year, while Years 2 and 3 are local implementation with support provided from SIC staff. The expectation is that schools will exit status following Year 3, and a fourth year of technical assistance (to promote and monitor for sustainability) is provided.</p> <p>Though the SEA indicates that its school improvement framework provides LEAs with increasing accountability measures over the course of the four-year support period (p.45) that does not appear to be outlined in this plan. Unique supports, however, include SEA-level analyses performed on the individual indicators, by subgroup, in order to tease out those schools that have statistically significant high performance in particular areas. Performing these calculations will allow the SEA to partner such LEAs/schools with other struggling in those areas but working</p>

	<p>with the same demographic groups. The SEA terms these partners “statistical neighbors” who would then share strategies and experiences to promote student achievement. As schools exit the CSI designation, they would be tapped to share their successful practices with newly identified schools (as well as those that have not exited status).</p> <p>In addition, school networks organized by indicators (as well as subgroups) will conduct action research projects related to evidence-based interventions that support achievement in particular indicators or with those subgroups – in support of TSI schools. However, all LEAs would be permitted to participate in these networks (not just those identified with support schools), which would expand the influence and impact of successful schools to and on TSI schools and CSI schools.</p>
Strengths	<p>WV has established clear standards for high-quality schools, published the standards as state policy, and implemented the standards over the past decade. The state’s plan thoroughly details actions, responsible parties, timelines, and tools for adequate and appropriate technical assistance to LEAs and schools. The state’s plan provides clear, specific actions, tools, and targets associated with Technical Assistance.</p> <p>The state’s plan is grounded in research for technical assistance. The state’s plan positions the SEA between the research-based practices utilized by the SEA over the past 10 years and the progressive Cycle of Continuous Improvement, which focuses on evidence-based interventions for its 12-year plan under ESSA. Creative data analysis proposal in the development of statistical neighbors and innovative school network plan allowing LEAs to help LEAs with practical supports and evidence-based interventions.</p>
Weaknesses	<p>Although WV describes what appears to be a solid, comprehensive approach to providing assistance to low performing schools and LEAs, the state’s proposed identification criteria raise questions about whether the state will effectively identify the neediest schools. Also, the state’s approach to providing support to targeted support schools appears to be generic to all LEAs.</p>
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	<p>WV describes certain additional steps it will take when LEAs have substantial numbers of consistently identified schools, including meeting with the local superintendent and increasing requirements associated with Title I school improvement funding. It appears that the state could have listed the additional actions described in this item when responding to A.4.viii.c—More Rigorous Interventions (p. 48).</p> <p>LEAs with “significant” numbers of CSI schools that have not met exit criteria within 3 years of having been identified will submit to an increased level of intervention from the SEA. This includes a comprehensive review of the implemented improvement strategies, development of an intensified improvement timeline with the LEA superintendent, a review of resource allocation with possible reconfiguration of funds (as allowable) to target needs, and an increase in required actions on the part of the local and SEA improvement coordinators prior to Title I budget approval. It is unclear whether all LEAs in this state are Title I recipients (e.g., some CSI schools may have been identified not due to their status as Title I but their failure to exit from TSI status). In addition, the monitoring of and progress reporting on these LEAs would take place more frequently.</p> <p>Finally, performance reports on these LEAs (based on LEA and individual school performance), would be presented to the state board, in which case the board may make the determination that it intervene in order to positively impact student achievement.</p>
Strengths	The state’s plan provides clear, specific actions, tools, and targets associated with this Additional Optional Action.
Weaknesses	<p>It would be helpful for the SEA to define what it considers “significant” numbers/percentages in terms of an LEA requiring this elevated level of intervention.</p> <p>The descriptive narrative provided in this section also applies to and should be included in the state’s response to section A.4.viii.c—More Rigorous Interventions of this plan.</p>
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to	

fully meet this requirement	
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**A.5: Disproportionate Rates of Access to Educators (ESEA section 1111(g)(1)(B))**

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

	Peer Response
Peer Analysis	<p>WV provides definitions for ineffective, inexperienced, and out-of-field teachers, and presents data for Title I and non-Title I schools that appears to demonstrate limited differences between rates for ineffective and out-of-field teachers, but potential differences in percentages of inexperienced teachers. Further, teacher experience appears to be a challenge in the state regardless of school Title I status. The state has not provided data generated from the student level, however, so the picture provided is incomplete (pp. 49-51).</p> <p>Students in high minority non-Title I schools are taught by 4.62 percent fewer inexperienced teachers than similarly situated students in Title I schools, but they are taught by 1.39 percent more teachers working out of field. In terms of disproportionality, these differences are significant only in the high-minority Title I schools employing greater numbers of inexperienced teachers. The concern, however, lies less with the disproportionality than the fact that approximately ¼ of educators in high minority schools (Title I and non-Title I) are inexperienced.</p>

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

	While the dashboard may prove a useful tool with important information for educators and LEAs, the state’s plan lacks a clear description on how it will 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.
Strengths	<p>WV has established reasonable definitions for ineffective, inexperienced, and out-of-field teachers, and demonstrates concern—in particular—about the percentage of teachers who are inexperienced in the state.</p> <p>The state’s plan includes the future development of a dashboard for LEAs and stakeholders into the existing data portal ZoomWV. The plan also descriptively illustrates its theory of action and included strategies for leadership capacity building from the classroom to the LEA.</p>
Weaknesses	The state’s definition of high-poverty schools appears to be circular and potentially misleading: per the state’s plan, a high-poverty school is one that is served as a Title I school. It is possible that schools with substantial populations of students in poverty are not Title I schools. More broadly, the data presented by the state in its plan appear to be aggregate, school-level statistics rather than data built up from the student level.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

**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?

	Peer Response
Peer Analysis	WV describes a fairly comprehensive approach to improving school climate/conditions, including accountability-focused incentives, targeted supports (e.g., training, data analysis & tools), and tiered intervention (pp. 52-54).

	The state’s plan provides adequate description and specificity on strategies and programs to improve school conditions for student learning, including Positive Behavior Intervention and Support, Safer and Supportive Schools, and Community Schools (Communities in Schools).
Strengths	The state has invested in data collection, analysis, and reporting tools that are likely to be able to help the state and districts identify areas for improvement in school conditions. The state identifies the removal of Out-of-School Suspensions as an allowable deduction for the calculation of Average Daily Attendance (p. 52). The Expanded School Mental Health model is an innovative facet to the state’s plan. Good reliance on data and the ‘early warning’ system in seeking to target risk behaviors before they become significant. SEA appears to be providing LEAs with a number of tools and supports to give them choices in the way that they can seek individualized interventions to address climate and safety in their schools.
Weaknesses	The SEA’s climate survey appears to be optional for schools (p.53); it would be helpful/valuable for the SEA to consider the school participation rate on these surveys and whether or not this could be a valuable metric in the accountability system (under Student Success).
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input type="checkbox"/> No
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

**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?

	Peer Response
Peer Analysis	WV appears to have invested in early learning transitions, and is now beginning to target more resources for middle and high school transitions. Example initiatives described include the state’s early warning system and 9 <sup>th</sup> grade academies. The state’s plan includes a clear description of Ready! Set! Go!, and West Virginia’s Grad 20/20, and it Early Warning System. The plan includes sufficiently descriptive narrative on the state board’s Policy 2510, which assures quality education and provides regulations for education programs, including specific expectations for

	<p>supporting the transition from middle to high school. The Personalized Education Plan (PEP) and West Virginia Transition Guide support a reduction in the risk of students dropping out.</p> <p>The state board has adopted a policy (Policy 2525: Universal Access to a Quality Early Education System) that includes a requirement that transition plans be developed for students moving from the state’s universal Pre-K program into Kindergarten. This includes information that should be provided to families to prepare for the transition to elementary school as well as readiness indicators, policies and procedures surrounding IEPs and the transfer of assessment data. The early warning system provided by the state can help LEAs/schools anticipate discipline issues that may arise, but it also provides dropout prediction capabilities based on predictive algorithms (on academics, attendance, behavior and demographics). This would allow school leadership at every school level to intervene early and as needed to reduce students’ risk of dropping out.</p> <p>At the high school level, “Ninth grade academies” are offered to students who need credit recovery, and creative scheduling and the assignment of “mentor teachers” also provide students with additional supports that they need to prove successful, and hopefully, to remain in school. Additionally, an open-access online tool has been developed to assist parents and students (beginning at the middle school level) in obtaining guidance and information on post-secondary opportunities (high school, career, college and financial aid planning).</p>
Strengths	<p>The SEA appears to have a strong, well-developed outline and plan for its transition process for students moving from Pre-K to the elementary school. The state’s plan includes a county system for transferring assessment data, including IEPs. The state’s Grad 20/20 program supports and facilitates local networks of LEAs. The College Foundation of West Virginia is a supportive tool that is likely to support students and families in preparations for school transitions beyond high school.</p>
Weaknesses	<p>The state’s transition support for students moving from middle to high school processes are nascent. Specifically at the middle and high school levels, however, there appear to be limited transition supports in place. Middle school students are offered the opportunity to earn high school credits and to develop personal education plans – 5-year, flexible educational plans established based on a student’s career goals and that run through the student’s high school career and a year beyond. (p.55-56). Similarly, a Transition Guide (p.56) is offered to students, beginning in middle school, which offers resources related to future employment (and perhaps?) education opportunities.</p>
Did the SEA meet all requirements?	<p><input checked="" type="checkbox"/> Yes (3 peer reviewers)  <input type="checkbox"/> No</p>
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

## 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?

	Peer Response
Peer Analysis	<p>WV describes the approach it took to establishing entry and exit criteria for English learners, and provided links to published documents that describe the state’s criteria as well as the 30-day assessment requirement (pp. 72-73).</p> <p>No assurance was provided that potential ELs would be assessed for such status within 30 days of enrollment. Policy 2417 and the guidance document do note that parents of identified ELs would be notified of such within 30 days of enrollment, and within 2 weeks if enrolling after the start of the school year. Compliance with this requirement would not be possible if potential ELs were not screened within the required time period, however this screening procedure and timeline is not explicitly stated in the plan.</p> <p>Though the plan itself does not specify its entrance and exit procedures or criteria, nor does it specify the timeline within which potential ELs must be screened, much of this information is contained in the board policy referenced in the plan (Policy 2417: Regulations and English Language Proficiency Standards for English Learners) and the procedural guidance document referenced and located online.</p> <p>The SEA states that LEA Title III directors reviewed the guidance document and policy at a June 15, 2017 ESEA director meeting; however, with only 3 LEAs and 9 consortia – out of 55 LEAs - participating in the SEA’s Title III program, it is unclear how the SEA ensured that this information was disseminated statewide and all staff responsible for EL programs were properly trained on these new statewide procedures/criteria.</p>
Strengths	<p>WV has convened a group of expert and practitioner stakeholders to help establish statewide entry and exit criteria for EL students, and has published statewide criteria for entry and exit. The state’s plan describes the EL Advisory Council (2016) comprised of a variety of stakeholders and solicited input from council members through a series of</p>

	webinars and face-to-face meetings. The state’s plan incorporated locally developed procedures and support documentation to facilitate discussion and consideration.
Weaknesses	<p>The state does not expect to be able to implement a statewide screening tool before the 2018-19 school year. Until that time, districts are directed to rely on screeners that they have individually identified.</p> <p>It is not clear that all stakeholders working with ELs across the state were notified of the new statewide procedures and timelines, since not all LEAs are “Title III” LEAs, and this information was indicated to have been shared with “Title III Directors” at a director’s meeting. (p.73). Failure to notify all parties would negatively impact the “implementation” of these newly-adopted procedures.</p>
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Affirm that it will assess students within 30 days of enrollment.

**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?

	Peer Response
Peer Analysis	<p>WV describes its commitment and approach to providing assistance to local districts in meeting the state’s long-term English language proficiency goals and standards. The approach includes the availability of coursework for teachers, written guidance, and targeted support (p. 74).</p> <p>The SEA supports ELP progress, specifically, by sponsoring an online ELD standards course for general educators (among others) to ensure that they have a foundational knowledge of the ELD standards that ELs must achieve in order to be successful in the mainstream classroom. The state offers information on varieties of language delivery models from which LEAs might choose as they develop programs for their ELs, and it holds two annual conferences for Title III directors. It will also provide technical assistance or PD, upon request of an LEA/school</p>

	when the entity is struggling to provide language support.
Strengths	The state’s plan includes a clear description of the state’s ELP Standards Course, Language Instruction Educational Program Guidance, Title III Directors Meeting, and Targeted LEA Assistant, which includes specific strategies and action steps for support that are likely to lead to student success (p. 74).
Weaknesses	The state does not specify how it will assist LEAs in helping ensure that ELs meet the state’s academic standards and must specify the supports it provides to assist LEAs’ English learners in meeting the long-term and interim progress goals, including but not limited to support such as: assistance with data analysis, pairing LEAs with “statistical neighbors”, setting interim progress toward proficiency goals and collaborating with and training state and local school improvement coordinators on EL instructional strategies might be options for the SEA to consider in order for it to offer a more comprehensive plan of support for those LEAs that serve English learners.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Specify how the State will assist LEAs in helping ensure that ELs meet the state’s academic standards and must specify the supports it provides to assist LEAs’ English learners in meeting the long-term and interim progress goals.

**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?

	Peer Response
Peer Analysis	<p>WV describes the development of a new/ revised approach to monitoring and providing assistance to Title III grant recipients, stating that the new monitoring system will first be in effect beginning in 2018-19. The described system includes data analysis, resource allocation review, and targeted assistance (pp. 74-75).</p> <p>The SEA describes a plan, to be implemented in 2018-19, in which predictive analyses will be performed on LEA data in order to identify LEAs with areas of risk for program compliance. The SEA states that “a variety of indicators” will be “disaggregated by subgroup performance when applicable,” but does not indicate that ELs’ progress toward, or achievement of, English proficiency is one of those indicators, nor can it be assumed to be the case considering that it is not presently an indicator in the SEA’s accountability system.</p>

	<p>The SEA indicates that it will implement components of a “comprehensive” monitoring and technical assistance plan for LEAs that includes: the state “Grants &amp; Planning System” – the Consolidated Application for funds, which align activities (in this case, Title III-funded) with the overall strategic planning goals of the LEA. Funds are released once an LEA submits an “approvable plan” that “enables the State to have meaningful or targeted conversations” with the LEA in order to ensure that progress is occurring.</p> <p>It is unclear what data are used to guide these conversations with LEAs when no ELP progress goals have been set by the SEA.</p>
Strengths	The state will match high risk LEAs and schools with statistically similar LEAs and schools who are performing well to form statistical neighbor mentorships.
Weaknesses	<p>It is unclear how the SEA will determine whether any Title III recipients are progressing toward meeting proficiency goals.</p> <p>In the guidance document, p. 4, “Exit Procedures” #1a, the SEA states that a student score of “proficient” on the state ELP assessment is “the formal criteria for exiting EL status” as well as exiting the Language Instruction Educational Program despite the fact that Policy 2147 adds two additional elements (#1 and #2 above) to the exit criteria. The additional “targeted LEA assistance” outlined to assist LEAs in their work with ELs appears to be primarily observational (site visits, monitoring) or optional (targeted professional learning opportunities) and would be unlikely to result in significant increases in student performance.</p>
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Explicitly outline the strategies the State will use to assist LEAs in improving their English language support programs.