

ESEA Flexibility

Peer Panel Notes



State Request: Arizona

Date: March 27, 2012

REVIEW AND EVALUATION OF REQUESTS

The U.S. Department of Education (Department) will use a review process that will include both external peer reviewers and staff reviewers to evaluate State educational agency (SEA) requests for this flexibility. This review process will help ensure that each request for this flexibility approved by the Department is consistent with the principles, which are designed to support State efforts to improve student academic achievement and increase the quality of instruction, and is both educationally and technically sound. Reviewers will evaluate whether and how each request for this flexibility will support a comprehensive and coherent set of improvements in the areas of standards and assessments, accountability, and teacher and principal effectiveness that will lead to improved student outcomes. Each SEA will have an opportunity, if necessary, to clarify its plans for peer and staff reviewers and to answer any questions reviewers may have during the on-site review. The peer reviewers will then provide comments to the Department. Taking those comments into consideration, the Secretary will make a decision regarding each SEA's request for this flexibility. If an SEA's request for this flexibility is not granted, reviewers and the Department will provide feedback to the SEA about the components of the SEA's request that need additional development in order for the request to be approved.

This document provides guidance for peer review panels as they evaluate each request during the on-site peer review portion of the review process. The document includes the specific information that a request must include and questions to guide reviewers as they evaluate each request. **Questions that have numbers or letters represent required elements.** The italicized questions reflect inquiries that reviewers will use to fully consider all aspects of an SEA's plan for meeting each principle, but do not represent required elements.

In addition to this guidance, reviewers will also use the document titled *ESEA Flexibility*, including the definitions and timelines, when reviewing each SEA's request. As used in the request form and this guidance, the following terms have the definitions set forth in the document titled *ESEA Flexibility*: (1) college- and career-ready standards, (2) focus school, (3) high-quality assessment, (4) priority school, (5) reward school, (6) standards that are common to a significant number of States, (7) State network of institutions of higher education, (8) student growth, and (9) turnaround principles.

Review Guidance

Consultation

1. Did the SEA meaningfully engage and solicit input on its request from teachers and their representatives?

- *Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of teachers and their representatives at the outset of the planning and implementation process?*
- *Did the SEA indicate that it modified any aspect of its request based on input from teachers and their representatives?*

Consultation Question 1 Panel Response

Tally of Peer Responses: 1 Yes, 5 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The Arizona Department of Education (ADE) conducted a series of hearings in April/May 2011 which led to identification of some key issues and the formation of five Regional Education Centers. Despite these efforts, some peers did not find sufficient evidence of meaningful engagement of teachers and their representatives.
<i>Strengths</i>	<ul style="list-style-type: none"> • ADE placed an emphasis on face-to-face meetings and briefings. • In the development of Principle 3, ADE engaged a working group of teachers and principals to help create evaluation guidelines.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • With the exception of Principle 3, ADE has not engaged, in an ongoing and iterative way, teachers and their representatives in the implementation plans of the flexibility request. • There is no mechanism such as an advisory group or other workgroup that can provide ongoing input to ADE on its new accountability plan.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • ADE should continue to inform teachers and their representatives of the status of the request for flexibility and continue updates on those elements still in development.

2. Did the SEA meaningfully engage and solicit input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes?

- *Is the engagement likely to lead to successful implementation of the SEA’s request due to the input and commitment of relevant stakeholders at the outset of the planning and implementation process?*
- *Did the SEA indicate that it modified any aspect of its request based on stakeholder input?*
- *Does the input represent feedback from a diverse mix of stakeholders representing various perspectives and interests, including stakeholders from high-need communities?*

Consultation Question 2 Panel Response

Tally of Peer Responses: 1 Yes, 5 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	ADE has conducted a series of regional meetings and indicates that it will continue to collect input. However, there is no real stakeholder advisory group or other entity that would allow for stakeholder input to the planning and support. In addition, there is no evidence that the request was modified based on input.
<i>Strengths</i>	<ul style="list-style-type: none"> • The list of groups that have been briefed (26 groups) is extensive and appears to include most major education groups and some other organizations (p. 12). • Organizations representing diverse learners have been briefed.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • ADE has not provided the results of its outreach efforts. • ADE provided a brief summary of the email responses received as a result of the email request of the superintendent. For example, the proposal (p. 12) indicates that provision of supplemental educational services (SES) “is a priority concern”; however, it is not clear how this was determined. The State educational agency (SEA) may benefit from an analysis of the input. • ADE would benefit from commitment of stakeholders. This appears to be an ADE designed and driven initiative. • It appeared to the peer reviewers that there was insufficient outreach to tribal and indigenous groups.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • ADE should consider creating a standing advisory group representing teachers and other education stakeholders that will provide feedback on the continuing implementation of the waiver. • ADE should continue to inform stakeholders of the status of the request for flexibility and continue to update those elements still in development.

Note to Peers: Staff will review 1.A Adopt College-And Career-Ready Standards, Options A and B.

1.B Transition to college- and career-ready standards

- 1.B Part A:** Is the SEA’s plan to transition to and implement college- and career-ready standards statewide in at least reading/language arts and mathematics no later than the 2013–2014 school year realistic, of high quality?

Note to Peers: See ESEA Flexibility Review Guidance for additional considerations related to the types of activities an SEA includes in its transition plan.

1.B Panel Response, Part A

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The Arizona State Board of Education adopted the Common Core State Standards (CCSS) in mathematics and English/language arts (ELA) in 2010. The State has developed a three-tiered transition timeline that indicates full implementation of the standards across K-12 by 2013–14. The plan is ambitious but appears realistic given the strategies that are proposed as well as the work done to date.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • ADE conducted a cross walk of previous Arizona standards and the new CCSS and identified key areas of differences in content or grade level emphasis (p. 22). This will aid in designing professional development and target the areas where greater support to teachers may be needed. • ADE will organize a regional professional network through the five Regional Education Centers in order to deliver professional development. • ADE proposes to develop a variety of materials such as curriculum maps, sample units, etc. and will use online methods to deliver these to LEAs and schools. ADE is a member of an e learning consortium (pg. 30) which should enable the dissemination of curricular materials. ADE is going to develop its own instructional materials using resources from Open Source and Achieve and will provide them to its teachers through professional development. • The transition to college- and career-ready standards is aided by a requirement that every student have an Education and Career Action Plan (ECAP) developed by 2013. Students will be assessed with ACT EXPLORE and those data will inform the ECAP. ADE participates in two College Board partnerships and GEAR UP programs. The ECAP legislation allows students to take courses in advance of their grade level in high school and exit early. • Teams of master teachers developed explanatory materials and examples showing content shifts and new rigor. Additional professional development is being developed on linguistic demands and integration with Multi-Tiered System of Support (MTSS). Phase 2 professional development includes scaffolding requirements for administrators and teachers, and training for administrators includes the use of Professional Learning Communities (PLC) to improve instruction with CCSS. ADE is building a cadre of certified CCSS trainers. Phase 3 training will begin in 2013 on full implementation of CCSS and ADE’s new standards in all subjects. • An analysis was completed on linguistic demands for English Learners to align with the CCSS. • ADE is in the process of revising test items to increase depth of knowledge required by CCSS. ADE is the fiscal agent for the Longitudinal Examination of Alternate Assessment progressions (LEAAP). The groups are conducting a study on participating states’ alternate assessments to determine next steps in revising them to include CCSS concepts. ADE also participates in the Partnership for Assessment of Readiness in College and Careers (PARCC) assessment consortium.
<i>Weaknesses, issues, lack of clarity</i>	None.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	None.

Part B: Is the SEA’s plan likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with the college- and career-ready standards?

Note to Peers: See ESEA Flexibility Review Guidance for additional considerations related to the types of activities an SEA includes in its transition plan.

1.B Panel Response, Part B

Tally of Peer Responses: 4 Yes, 2 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	ADE’s request is very specific about how English Learners and students with disabilities will be provided access to the CCSS. Some peers felt the request does not adequately describe how the SEA ensures rigorous academic content and recognition of the cultural and linguistic backgrounds of their students.
<i>Strengths</i>	<ul style="list-style-type: none"> • The new standards have been analyzed for linguistic demands and informed the 2011 English language proficiency (ELP) standards in the State. • ADE is further analyzing its ELP standards to identify professional development needs. This training will be incorporated into the regularly scheduled professional development for teachers in the Structured English Immersion programs. This professional development will be led by a cadre of master teachers. • Beginning in 2011, ongoing professional development including face-to-face sessions and webinars dedicated to the ELP standards work will be aligned to the CCSS (p. 24). • The SEA is participating in two major national consortia that are developing learning progressions for students with the most significant cognitive disabilities participating in alternate assessments based on alternate academic achievement standards as well as new alternate assessments that will be aligned with PARCC. • There is a strong commitment to using Universal Design for Learning (UDL) as part of the implementation of the new standards.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • There is lack of specificity regarding other subgroups beyond English Learners and students with disabilities or low-performing students. It is not clear whether specific efforts with all teachers are being undertaken to ensure that all students can access the rigorous academic content of the CCSS. • It appears that the ADE English Learner standards are not inclusive of heritage and/or diverse cultural linguistic groups.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • ADE should align the ELP standards to the CCSS in a manner that promotes content learning for its English Learners such as a focus on the language proficiency needed for access to content.

1.C Develop and Administer Annual, Statewide, Aligned, High-Quality Assessments that Measure Student Growth

- 1.C Did the SEA develop, or does it have a plan to develop, annual, statewide, high-quality assessments, and corresponding academic achievement standards, that measure student growth and are aligned with the State’s college- and career-ready standards in reading/language arts and mathematics, in at least grades 3-8 and at least once in high school, that will be piloted no later than the 2013–2014 school year and planned for administration in all LEAs no later than the 2014–2015 school year, as demonstrated through one of the three options below? Does the plan include setting academic achievement standards?

Note to Peers: Staff will review Options A and C.

If the SEA selected Option B:

If the SEA is neither participating in a State consortium under the RTTA competition nor has developed and administered high-quality assessments, did the SEA provide a realistic, high-quality plan describing activities that are likely to lead to the development of such assessments, their piloting no later than the 2013–2014 school year, and their annual administration in all LEAs beginning no later than the 2014–2015 school year? Does the plan include setting academic achievement standards?

1.C, Option B Panel Response

Not applicable because the SEA selected 1.C, Option A or Option C

Tally of Peer Responses: X Yes, X No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	N/A

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance Suggestions</i>	N/A

Principle 1 Overall Review

Is the SEA’s plan for transitioning to and implementing college-and career-ready standards, and developing and administering annual, statewide, aligned high-quality assessments that measure student growth, comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

Principle 1 Overall Review Panel Response

Tally of Peer Responses: 5 Yes, 1 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The State has legislation and state board adopted rules that call for implementation of CCSS. There is a coherent plan and timeline for implementing the new standards, reflecting an understanding of how the new standards compare to previous standards. The implementation efforts have given specific attention to the needs of students with disabilities and English Learners. Peers felt that, because Arizona’s curricular alignment effort is developing with the CCSS, it is not clear that there will be a recognition of the cultural and linguistic heritage of Arizona’s students.
<i>Strengths</i>	<ul style="list-style-type: none"> • The professional development and support for implementation will rely on regional networks and the newly created five Regional Education Centers and be led by master teachers. • The SEA is engaging in developing curricular materials aligned with CCSS that will enable teachers to have the resources needed to support the new standards and implementation. • ADE has undertaken a review of its own assessments and is participating in consortia to develop an alternate assessment based on alternate academic achievement standards, both of which will align to the CCSS. • ADE has demonstrated specific regulations and activities that will support all students’ transition to postsecondary education or careers.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The three phases of professional development (awareness, target and full) are not clearly defined. For example, the difference between “deepening knowledge and purposeful implementation” in Phase 2 and “full” implementation in Phase 3 is not clear. • The ECAP may not hold students to high academic standards, because it is not clear that it is aligned with the CCSS. • The focus on underachieving subgroups is not evident, other than English Learners and students with disabilities. • Peers felt that, because Arizona’s curricular alignment effort is developing with the CCSS, it is not clear that there will be a recognition of the cultural and linguistic heritage of Arizona’s students.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Peers recommend that ADE consider joining or collaborating with other consortia or states in its review of the ELP standards as part of the alignment to the CCSS.

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

2.A Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support

2.A.i Did the SEA propose a differentiated recognition, accountability, and support system, and a high-quality plan to implement this system no later than the 2012–2013 school year, that is likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students? (*note to Peers, please write to this question after completing 2.A.i.a and 2.A.i.b*)

2.A.i Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<p>ADE’s proposed system provides differentiated recognition, accountability and support for some LEAs in the State. However, the peers felt that the system as proposed is insufficient for several reasons: graduation rate is not given enough weight; the use of student growth percentile (SGP) does not maximize growth for traditionally low-achieving subgroups; and using a normative model of growth for a combined subgroup (lowest 25 percent) can mask performance of low-performing subgroups. Additionally, ADE has not provided enough information explaining how all schools will be included in this accountability system, specifically the 417 small, K-2, and alternative schools. Further, in ADE’s accountability model, graduation rates for subgroups are not addressed. Finally, use of a normative model for measuring student growth of subgroups does not provide an incentive to close achievement gaps.</p>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • ADE’s accountability program proposes to merge its current A-F Letter Grade system and requirements for the No Child Left Behind Act (NCLB) into a single system over time, resulting in alleviation of conflicting feedback and an opportunity to address the needs of the lowest-achieving students through focused interventions (p. 37).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Graduation rates do not carry enough weight and subgroup issues are not addressed. • Using normative growth to measure subgroup progress masks low performance. • The development of the three parallel models for small, K-2, and alternative schools is not clear and needs to be fully explained (p. 49).
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The peers recommend that ADE carefully consider the impact that using a combined subgroup of the lowest 25 percent of students has on the ability to track individual subgroup performance.

- a. Does the SEA’s accountability system provide differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools in those LEAs based on (1) student achievement in reading/language arts and mathematics, and other subjects at the State’s discretion, for all students and all subgroups of students identified in ESEA section 1111(b)(2)(C)(v)(II); (2) graduation rates for all students and all subgroups; and (3) school performance and progress over time, including the performance and progress of all subgroups?

2.A.i.a Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	ADE’s proposed system has a differentiated recognition, accountability and support for some LEAs in the State. However, the peers felt that the system as proposed is insufficient because not enough weight is given to graduation rate; the use of SGP does not maximize growth for traditionally low-achieving subgroups; and using a normative model of growth for a combined subgroup can mask performance of low-performing subgroups. Additionally, ADE has not provided information about how all schools will be included in this accountability system, specifically the 417 small, K-2, and alternative schools.

<i>Strengths</i>	<ul style="list-style-type: none"> • The differentiated accountability system identifies five levels of schools and is a composite of growth and achievement and growth for the lowest-performing students. The request integrates three accountability systems into a single letter grade system. This may be more understandable for the public. • The growth of the lowest-performing students (lowest 25 percent) is included in the grading system and may include more low-achieving students since the minimum “n-size” may have excluded some subgroups (p.42). This could increase the number of schools that are held accountable. • ADE uses the same system to identify its reward, priority, and focus schools.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • ADE has not provided information about how all schools will be included in this accountability system, specifically the 417 small, K-2, and alternative schools. • Insufficient weight is given to graduation rates and to dropout rates in the accountability system. Graduation rates are not meaningfully included as they count for only 1.5 percent of the total possible points (200) for high schools. Additionally, graduation rates for subgroups are not addressed (p. 42). • The scores used for determining school ratings are not rigorous and there is not enough differentiation between the Average and Excellent ratings. The current system may permit a school with low percentages of growth or low proficiency rates to receive a high rating. • Using normative SGPs is a problem for traditionally low-achieving subgroups because there is no incentive to maximize growth for these students to reach standard as they are only compared to like student populations (p. 43). • In the absence of final legislation or guidelines, the peers are unable to determine whether the Student Growth Target (SGT) proposed for the AMOs will be used as a part of the A-F Letter Grade system or as a separate means to identify rewards and supports. AMOs or specific growth targets should be included in the letter grading system for schools to account for the normative growth model (p.47-49).
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • ADE should consider giving more weight to the graduation rate and/or decreasing the dropout rate. • ADE should consider reporting the four-year cohort rate for graduation because it provides important information to families about the on-time graduation of a high school. • Peers suggest the ADE consider using growth to standard, particularly for low-performing students to ensure progress toward proficiency.

- b. Does the SEA’s differentiated recognition, accountability, and support system create incentives and provide support that is likely to be effective in closing achievement gaps for all subgroups of students?

2.A.i.b Panel Response*Tally of Peer Responses: 0 Yes, 6 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	ADE's accountability system may not create adequate incentives to close achievement gaps because low achievement for some subgroups may be masked by only using a combined subgroup of the lowest 25 percent and graduation rates for subgroups are not included. Additionally using a normative model for measuring student growth of subgroups does not provide an incentive to close achievement gaps.
<i>Strengths</i>	<ul style="list-style-type: none"> • The growth of the lowest-performing students (lowest 25 percent) is included in the grading system and may include more low-achieving students since the minimum “n-size” may have excluded some subgroups (p. 42). • The SEA is targeting assistance for low-performing schools by proposing to provide supplementary reading instruction for teachers’ professional development in grades K-3 (Addendum, 74). • Students with the most significant cognitive disabilities who take an alternate assessment based on alternate academic achievement standards will be included in the A-F Letter Grade composite score (p. 43).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The growth of the lowest-performing students (lowest 25 percent) is included in the grading system. However, low performance of some subgroups may be masked in the A-F grading system. • The SGPs appear to be normative in that the growth percentile represents how much growth an individual student has made relative to academic peers, which would decrease the incentive to close the achievement gaps of subgroups to standard (p. 43). • Graduation rates for subgroups are not addressed.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • See technical assistance in Section 2.A.i.

*c. Note to Peers: Staff will review 2.A.i.c**Note to Peers: Staff will review 2.A.ii Option A.*

ONLY FOR SEAs SELECTING OPTION B: If the SEA elects to include student achievement on assessments other than reading/language arts and mathematics in its differentiated recognition, accountability, and support system by selecting Option B, review and respond to peer review questions in section 2.A.ii. If the SEA does not include other assessments, go to section 2.A.iii.

2.A.ii Did the SEA include student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools?

a. Note to Peers: Staff will review 2.A.ii.a

b. Does the SEA’s weighting of the included assessments result in holding schools accountable for ensuring all students achieve the State’s college- and career-ready standards?

c. Note to Peers: Staff will review 2.A.ii.c

2.A.ii.b PANEL RESPONSE

Not applicable because the SEA selected 2.A, Option A

Tally of Peer Responses: X Yes, X No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance Suggestions</i>	N/A

2.B Set Ambitious but Achievable Annual Measurable Objectives

2.B Note to Peers: Staff will review Options A and B.

Did the SEA describe the method it will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics, for the State and all LEAs, schools, and subgroups, that provide meaningful goals and are used to guide support and improvement efforts through one of the three options below?

If the SEA selected Option C:

Did the SEA describe another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups?

- i. Did the SEA provide the new AMOs and the method used to set these AMOs?
 - ii. Did the SEA provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs?
 - iii. If the SEA set AMOs that differ by LEA, school, or subgroup, do the AMOs require LEAs, schools, and subgroups that are further behind to make greater rates of annual progress?
 - iv. Did the SEA attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the “all students” group and all subgroups? (Attachment 8)
- *Are these AMOs similarly ambitious to the AMOs that would result from using Option A or B above?*
- *Are these AMOs ambitious but achievable given the State’s existing proficiency rates and any other relevant circumstances in the State?*
- *Will these AMOs result in a significant number of children being on track to be college- and career-ready?*

2.B, Option C (including Questions i–iv) Panel Response

Not applicable because the SEA selected 2.B, Option A or Option B

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	ADE has not provided a rationale for setting the AMOs. As a result, they are not educationally sound and are not consistently ambitious across subgroups.
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA provides a methodology for identifying AMOs for all schools and subgroups. • The SEA did provide a copy of average statewide proficiency. • ADE’s AMOs may result in a significant number of children on track to being college- and career-ready due to the fact that Growth to Standard and Growth to Excellence Targets will be identified for each student (p. 54). • ADE will calculate and report SGTs for all students and disaggregated subgroups (pp. 55-56).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The SEA did not provide the academically sound reasoning for the pattern of achievement, or for setting the two percent minimum growth in proficiency AMOs indicated in the Addendum submitted on March 12, 2012. • ADE has set extremely large AMOs for English Learners and Hispanic students in mathematics and reading for some grade levels. Based on historic achievement data submitted in the Addendum that shows dramatic increases in percent proficient for Limited English Proficient (LEP) from 2010 to 2011. For example, Table 3 shows LEP proficiency increased from 27 percent to 56 percent from 2010 to 2011, resulting in a growth goal of 11 percent, which is dramatically higher than the average 2 percent. • Though ADE noted that the AMOs will provide feedback and will be used for reporting, use of these AMOs for the A-F Letter Grade system is contingent on proposed legislation (p. 58). • ADE needs to clarify how it determines the growth levels needed to meet the Growth to Standard and Growth to Excellence targets (p. 54). • The AMOs as proposed will not close achievement gaps and are not as rigorous as Option A or B.
<i>Technical Assistance Suggestions</i>	None.

2.C Reward Schools

2.C.i Did the SEA describe its methodology for identifying highest-performing and high-progress schools as reward schools?

2.C.i PANEL RESPONSE

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA has described a methodology for identifying reward schools. The peers have concerns that the highest-performing schools may not be closing achievement gaps.
<i>Strengths</i>	<ul style="list-style-type: none"> • High-progress high schools will be required to have a graduation rate of at least 80 percent and show an increase in graduation rate from the previous year (p. 61). • Under the new system, fewer schools will be identified as high-performing and high-progress reward schools than under the AYP system. Based on the information provided, the ADE's letter grading system appears to provide better differentiation among performance of high-performing schools than under AYP (p. 59).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The rating system does not guarantee that reward schools are closing achievement gaps or that they are the highest performing. For example, Title I “A” schools had only 50 percent closing achievement gaps (p. 60). • In it unclear the extent to which graduation rates will count toward designation as a high-performing school. During the phone call with the SEA, it indicated that a graduation rate of 90 percent was required for a high-performing school; however, in the request (Table 2.3, p. 45), it indicates that the current graduation rate average is at 79 percent.
<i>Technical Assistance Suggestions</i>	None.

Note to Peers: Staff will review 2.C.ii.

2.C.iii Are the recognition and, if applicable rewards, proposed by the SEA for its highest-performing and high-progress schools likely to be considered meaningful by the schools?

➤ *Has the SEA consulted with LEAs and schools in designing its recognition and, where applicable, rewards?*

2.C.iii PANEL RESPONSE

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	ADE’s proposed recognition and rewards were described in detail and are likely to be considered meaningful by the schools.
<i>Strengths</i>	<ul style="list-style-type: none"> • The designation of a reward school will provide opportunities to serve as key strategic partners in the work to raise achievement levels across the State (p. 61). • The SEA provides meaningful rewards in the form of public recognition, financial grants, additional professional development, and leadership opportunities. • ADE will provide a competitive grant program for reward schools to share their best practices with other schools (pp. 61-62).
<i>Weaknesses, issues, lack of clarity</i>	None.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	None.

2.D Priority Schools

Note to Peers: Staff will review 2.D.i and 2.D.ii.

2.D.iii Are the interventions that the SEA described aligned with the turnaround principles and are they likely to result in dramatic, systemic change in priority schools?

- a. Do the SEA's interventions include all of the following?
 - (i) providing strong leadership by: (1) reviewing the performance of the current principal; (2) either replacing the principal if such a change is necessary to ensure strong and effective leadership, or demonstrating to the SEA that the current principal has a track record in improving achievement and has the ability to lead the turnaround effort; and (3) providing the principal with operational flexibility in the areas of scheduling, staff, curriculum, and budget;
 - (ii) ensuring that teachers are effective and able to improve instruction by: (1) reviewing the quality of all staff and retaining only those who are determined to be effective and have the ability to be successful in the turnaround effort; (2) preventing ineffective teachers from transferring to these schools; and (3) providing job-embedded, ongoing professional development informed by the teacher evaluation and support systems and tied to teacher and student needs;
 - (iii) redesigning the school day, week, or year to include additional time for student learning and teacher collaboration;
 - (iv) strengthening the school's instructional program based on student needs and ensuring that the instructional program is research-based, rigorous, and aligned with State academic content standards;
 - (v) using data to inform instruction and for continuous improvement, including by providing time for collaboration on the use of data;
 - (vi) establishing a school environment that improves school safety and discipline and addressing other non-academic factors that impact student achievement, such as students' social, emotional, and health needs; and

(vii) providing ongoing mechanisms for family and community engagement?

2.D.iii.a (including questions (i)-(vii)) Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The interventions that ADE described are aligned with the turnaround principles and are likely to result in systemic change in priority schools.
<i>Strengths</i>	<ul style="list-style-type: none"> • ADE has developed and implemented a system of support based on the turnaround principles in the School Improvement Grant (SIG) cohorts over the last two years and this support will be extended to all priority and focus schools in 2012–13 (p. 65). • ADE noted that the required seven interventions have been aligned with the major components of the transformation and turnaround models currently being implemented in LEAs awarded SIG funds as well as the turnaround principles outlined in <i>ESEA Flexibility</i>. • The interventions have been cross walked as well as with the Six Quality Indicators of High-Achieving Schools and are used as the foundation of the 2011 Tier III SIG grants currently being released and funded. • The interventions were further developed and defined based on the lessons learned from the SIG implementation over the last two years. Steps are already underway to include the seven interventions into the school- and LEA-level Continuous Improvement Plans of priority schools for the 2012–2013 school year (p. 66). • The SEA integrated interventions with the new teacher and principal evaluation systems.
<i>Weaknesses, issues, lack of clarity</i>	None.
<i>Technical Assistance Suggestions</i>	None.

b. Are the identified interventions to be implemented in priority schools likely to —

- (i) increase the quality of instruction in priority schools;
- (ii) improve the effectiveness of the leadership and the teaching in these schools; and
- (iii) improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students?

2.D.iii.b (including questions (i)-(iii)) Panel Response*Tally of Peer Responses: 6 Yes, 0 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	ADE identified and described interventions for priority schools that are likely to improve instruction, improve effectiveness of leaders and teachers, and increase achievement.
<i>Strengths</i>	<ul style="list-style-type: none"> • ADE requires LEAs that have priority schools to create an improvement plan that contains all of the required interventions that is driven by data and includes a thorough analysis of subgroup performance. • The SEA places schools into the intervention process based on historical performance data, which designate those schools that will receive the most intensive interventions. • There are consequences if an LEA does not fully implement the interventions, is resistive to implementing interventions, or does not make progress (p. 80). • The SEA requires LEAs to implement student-based financial decision-making models and strategies to ensure that funds are used to increase student learning (p. 73). • ADE described the requirements to determine effective leadership and teachers such as reviewing all existing staff using an approved evaluation system aligned to the Arizona Teacher and Principal Evaluation Framework (pp. 66-67). • ADE’s technical assistance and support for LEAs and schools was described and includes four components: technical assistance, professional development, progress monitoring, and compliance monitoring (pp. 75-80). • The SEA solicited from the LEAs what kinds of support they will need (Attachment 2).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Specific interventions for particular subgroups such as English Learners and students with disabilities were not described in detail.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should consider providing LEAs with more specific professional development with teachers to ensure they have evidence-based interventions for working with English Learners, students with disabilities, and low-achieving students. • The SEA should support its LEAs in recognizing and attending to achievement gaps.

c. Note to Peers: Staff will review 2.D.iii.c

2.D.iv Does the SEA’s proposed timeline ensure that LEAs that have one or more priority schools will implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year?

- *Does the SEA’s proposed timeline distribute priority schools’ implementation of meaningful interventions aligned with the turnaround principles in a balanced way, such that there is not a concentration of these schools in the later years of the timeline?*

2.D.iv Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	ADE provided a timeline for interventions, including a phase in of priority schools so that implementation would begin no later than 2014–15 (pp. 80-83).
<i>Strengths</i>	<ul style="list-style-type: none"> • The timeline for priority schools as described in the request will provide the LEAs and schools adequate time to identify target needs and strategies and allocate resources to each priority school (p. 81).
<i>Weaknesses, issues, lack of clarity</i>	None.
<i>Technical Assistance Suggestions</i>	None.

2.D.v Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement exits priority status?

- a. Do the SEA’s criteria ensure that schools that exit priority status have made significant progress in improving student achievement?
- *Is the level of progress required by the criteria to exit priority status likely to result in sustained improvement in these schools?*

2.D.v and 2.D.v.a PANEL RESPONSE

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	ADE requires that, to exit priority status, a school must maintain a letter grade of C or better for two consecutive years. The peers are concerned that ADE’s rating system will not ensure that schools moving from D/F to C have made significant progress.
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA requires a priority school to achieve multiple years of sustained improvement to exit priority status.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> It is not clear how ADE determined that movement from an F to C would require significant improvement and substantially high growth given the peers' concerns regarding the ADE's rating system (see weakness section 2.A.i.a above).
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> The SEA should continue its collaborations with states with similar demographics and diversity to identify factors that might contribute to sustainability and growth in student achievement to prevent schools from returning to priority status.

2.E Focus Schools

Note to Peers: Staff will review 2.E.i, 2.E.i.a, and 2.E.ii

2.E.i Did the SEA describe its methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as focus schools? If the SEA's methodology is not based on the definition of focus schools in *ESEA Flexibility* (but is instead, *e.g.*, based on school grades or ratings that take into account a number of factors), did the SEA also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department's "Demonstrating that an SEA's Lists of Schools Meet ESEA Flexibility Definitions" guidance?

a. Note to Peers: Staff will review 2.E.i.a.

b. Is the SEA's methodology for identifying focus schools educationally sound and likely to ensure that schools are accountable for the performance of subgroups of students?

2.E.i.b Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Though ADE provided a rationale for defining focus schools, that rationale may not ensure that schools are accountable for the performance of subgroups of students, which is a requirement of focus schools.
<i>Strengths</i>	None.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • ADE defines a focus school as any Title I school with a grade of “D” that is not a priority school. Only 25 percent of this rating is based on the growth of the combined subgroup. This has two weaknesses in identifying focus schools: (1) a high-performing school can compensate for poor growth of the combined subgroup; and (2) specific subgroup gaps may not be identified. • Without the use of specific subgroup gaps, it is more difficult to target interventions to student needs. • 417 of ADE’s schools (small, K-2, and alternative schools) are excluded from the calculations determining focus schools (p. 84).
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should consider additional ways to identify focus schools that specifically examine individual subgroup performance.

2.E.ii *Note to Peers: Staff will review 2.E.ii*

2.E.iii Does the SEA’s process and timeline ensure that each LEA will identify the needs of its focus schools and their students and implement interventions in focus schools at the start of the 2012–2013 school year? Did the SEA provide examples of and justifications for the interventions the SEA will require its focus schools to implement? Are those interventions based on the needs of students and likely to improve the performance of low-performing students and reduce achievement gaps among subgroups, including English Learners and students with disabilities?

- *Has the SEA demonstrated that the interventions it has identified are effective at increasing student achievement in schools with similar characteristics, needs, and challenges as the schools the SEA has identified as focus schools?*
- *Has the SEA identified interventions that are appropriate for different levels of schools (elementary, middle, high) and that address different types of school needs (e.g., all-students, targeted at the lowest-achieving students)?*

2.E.iii Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The interventions described are based on the needs of students and likely to improve the performance of low-performing students particularly because schools are monitoring in-school subgroup achievement gaps.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • ADE has a timeline that will allow interventions in focus schools in 2012–2013. • ADE noted that LEAs are required to select necessary interventions that have the greatest probability of closing the identified achievement gaps in their focus schools (p. 85). • LEAs with focus schools must submit their LEA and school Continuous Improvement Plans to the ADE for approval. The ADE will ensure the plans address the differentiated school needs and populations stated in the LEA’s needs assessment prior to approval (p. 92). • In order to provide a cohesive support system that is built on the foundations of the Six Quality Indicators of High-Achieving Schools (already being used in SIG schools), ADE chose to expand these indicators into the seven targeted interventions and aligned these to the turnaround principles in <i>ESEA Flexibility</i>. This cohesive approach allows ADE to focus and target efforts on these critical interventions at both focus and priority schools, albeit at different intensity levels (p. 85). • ADE described in detail the interventions to be used aligned to the turnaround principles and State requirements for review (pp. 85-91). • The SEA will use an online progress monitoring tool whereby individual focus schools will monitor achievement gaps among subgroups within the school and report their data twice per year (p. 97).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Specific interventions for subgroups or low graduation rates were not detailed. • The teacher and leader evaluation systems are not integrated into the focus school interventions (pp. 87-89).
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • ADE should identify interventions that have worked with English Learners, students with disabilities, low-achieving students, and any race/ethnicity groups with low achievement. • ADE should collaborate with other states on how to increase graduation rates for their low-achieving schools and identify interventions for their chronically low-performing subgroups. • ADE should use the reward schools and reward school grant to share best practices to increase collaboration between high-performing schools, specifically schools that are high-performing with subgroups, and focus schools. • ADE should integrate the teacher and leader evaluation systems into the focus school interventions.

2.E.iv Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status?

a. Do the SEA’s criteria ensure that schools that exit focus status have made significant progress in improving student achievement and narrowing achievement gaps?

➤ *Is the level of progress required by the criteria to exit focus status likely to result in sustained improvement in these schools?*

2.E.iv and 2.E.iv.a PANEL RESPONSE

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	ADE requires that, to exit focus status, a school must maintain a letter grade of C or better for two consecutive years. It is not evident that this would increase growth and/or proficiency in specific subgroups.
<i>Strengths</i>	None.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • It is not clear how ADE determined that movement from an F to C would require significant improvement and substantially high growth for specific subgroups. • Sustainability of improvement was not addressed.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • ADE should consider criteria for exiting focus school status that require the closing of subgroup achievement gaps.

2.F Provide Incentives and Support for other Title I Schools

2.F.i Does the SEA’s differentiated recognition, accountability, and support system provide incentives and supports for other Title I schools that, based on the SEA’s new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps?

2.F.i Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	ADE described extensive incentives and supports for other Title I schools that, based on the SEA’s A-F grading system, are not making progress in improving student achievement.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • Every LEA and school that receives Title I funds is required to submit a Continuous Improvement Plan (p. 110). • ADE has developed a web-based application, Arizona LEA Tracker (ALEAT), in which both LEA and school plans can be submitted to the ADE and managed by the LEA (p. 115). Currently, all LEA plans are reviewed by ADE staff prior to approval of their ESEA funding (p. 116). The peers felt the plans are extremely detailed and provide a lot of guidance for the LEA. • Schools receiving a letter grade of C and demonstrating a lack of student achievement will be alerted to Pre-Intervention status which means the schools will be eligible for directed, but less intense supports than focus or priority schools (p. 110). Pre-Intervention activities are described on pages 119-120. • ADE described the support it provides LEAs through the Title I Section and the School Improvement and Intervention Section including technical assistance, professional development, progress monitoring, and compliance monitoring (p. 110). • ADE’s School Improvement and Intervention Section will create additional tools to support LEAs’ and schools’ analysis of their students with disabilities and who are learning English (p. 120).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • There is no systematic process for addressing student achievement gaps in specific subgroups.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • ADE should consider identifying schools with achievement gaps in subgroups and target interventions to these students.

2.F.ii Are those incentives and supports likely to improve student achievement, close achievement gaps, and increase the quality of instruction for all students, including English Learners and students with disabilities?

2.F.ii Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Insufficient details are provided on how these supports are likely to close achievement gaps and increase the quality of instruction for all students, including English Learners and students with disabilities.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • ADE provided information on how it is working with LEAs and schools to provide technical assistance, professional development, progress monitoring, and compliance monitoring. • See strengths in section 2.F.i.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Insufficient details are provided on how these supports are likely to close achievement gaps and increase the quality of instruction for all students, including English Learners and students with disabilities. • There is a lack of specificity regarding how teachers will receive feedback on subgroup performance in order to design and refine instructions.
<i>Technical Assistance Suggestions</i>	None.

2.G Build SEA, LEA, and School Capacity to Improve Student Learning

- 2.G** Is the SEA’s process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, likely to succeed in improving such capacity?
- Is the SEA’s process for ensuring timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools likely to result in successful implementation of these interventions and in progress on leading indicators and student outcomes in these schools?
 - *Did the SEA describe a process for the rigorous review and approval of any external providers used by the SEA and its LEAs to support the implementation of interventions in priority and focus schools that is likely to result in the identification of high-quality partners with experience and expertise applicable to the needs of the school, including specific subgroup needs?*
 - Is the SEA’s process for ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools under the SEA’s differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources) likely to result in successful implementation of such interventions and improved student achievement?
 - Is the SEA’s process for holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools, likely to improve LEA capacity to support school improvement?

2.G (including i, ii, and iii) Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<p>ADE’s process for ensuring timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in all schools is likely to result in successful implementation of these interventions and in progress on leading indicators and student outcomes.</p>
<i>Strengths</i>	<ul style="list-style-type: none"> • ADE described a process for the rigorous review and approval of any external providers used by the SEA and its LEAs to support the implementation of interventions in priority and focus schools (p. 134). • ADE has established five Regional Education Centers to support schools and LEAs (p. 123). • ADE has developed a set of tools to assist with building LEA capacity and described these tools and how they will work (p. 125). These tools will help the LEA identify its needs and tailor its interventions. • ADE works with LEAs and priority schools at least once a month. Trainings with priority schools are conducted with the Leadership Team, and onsite visits for the purpose of providing technical assistance and progress monitoring are conducted at least quarterly. At least two site visits will be conducted per LEA with focus schools (p. 130). • ADE will incorporate many tools and requirements for priority and focus schools including a Progress Monitoring Instrument, Data Workbook, quarterly webinars, and surveys to staff (p. 131). • ADE provided a detailed, month-by-month timeline for providing technical assistance, monitoring priority and focus schools, and providing differentiated support and accountability (pp. 131-134). An implementation timeline for school improvement activities was provided (p. 138-139). • ADE provided a graph of its Continuous Improvement Model, which includes resource management and monitoring (p. 137). • There is \$12.5 million available to eligible LEAs to build their capacity (p. 124). The SEA distributed funds to ensure that schools with greater need received more funding (p. 130). • The SEA reorganized itself to be able to deliver the technical assistance and support more effectively to the LEAs.
<i>Weaknesses, issues, lack of clarity</i>	None.
<i>Technical Assistance Suggestions</i>	None.

Principle 2 Overall Review

Is the SEA’s plan for developing and implementing a system of differentiated recognition, accountability, and support likely to improve student achievement, close achievement gaps, and improve the quality of instruction for students? Do the components of the SEA’s plan fit together to create a coherent and comprehensive system that supports continuous improvement and is tailored to the needs of the State, its LEAs, its schools, and its students? If not, what aspects are not addressed or need to be improved upon?

PRINCIPLE 2 OVERALL REVIEW PANEL RESPONSE

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	ADE’s proposed accountability plan includes features to identify student achievement and growth. The strongest feature of the overall system is the State support to LEAs to build capacity for school improvement. However, the peers had numerous concerns about the school rating system, the low weighting of graduation rate, the setting of AMOs, and the identification of focus schools.
<i>Strengths</i>	<ul style="list-style-type: none"> • Combining accountability into a single system. • Use of student achievement and growth in ELA and mathematics to identify school letter grades. • ADE’s support and monitoring from the State level to LEAs and schools. • The SEA has targeted interventions for low-performing schools. • The overall intervention system is comprehensive, well-detailed, and has significant and extensive resources for LEA improvement and capacity building.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • ADE uses a combined subgroup throughout the accountability system, which may mask achievement needs of individual subgroups. • Graduation rates do not carry enough weight in the A-F grading system. • Clarification is needed on AMO development and if they will be used in the A-F grading system. • ADE has not provided information about how all schools will be included in this accountability system, specifically the 417 small, K-2, and alternative schools. • The accountability rating system is not built on particularly high standards.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • ADE should consider increasing the weight of graduation rates and/or dropout rates in the accountability system. • ADE should consider including a mechanism in the accountability system to address achievement gaps of subgroups. • ADE should continue to refine the methodology for the data analysis for math and reading English Learner data in order to explain the significant increases between 2010 and 2011. (Addendum, 3/12/12). • Additionally, please see technical assistance provided in the subsections of this principle.

Principle 3: Supporting Effective Instruction and Leadership

3.A Develop and Adopt Guidelines for Local Teacher and Principal Evaluation and Support Systems

3.A.i Has the SEA developed and adopted guidelines consistent with Principle 3 through one of the two options below?

If the SEA selected **Option A**:

If the SEA has not already developed and adopted all of the guidelines consistent with Principle 3:

- i. Is the SEA’s plan for developing and adopting guidelines for local teacher and principal evaluation and support systems likely to result in successful adoption of those guidelines by the end of the 2011–2012 school year?

3.A.i, Option A.i Panel Response

Not applicable because the SEA selected 3.A, Option B

Tally of Peer Responses: X Yes, X No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance Suggestions</i>	N/A

- ii. Does the SEA’s plan include sufficient involvement of teachers and principals in the development of these guidelines?

3.A.i, Option A.ii Panel Response

Not applicable because the SEA selected 3.A, Option B

Tally of Peer Responses: X Yes, X No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance Suggestions</i>	N/A

iii. Note to Peers: Staff will review iii.

If the SEA selected Option B:

If the SEA has developed and adopted all guidelines consistent with Principle 3:

- i. Are the guidelines the SEA has adopted likely to lead to the development of evaluation and support systems that increase the quality of instruction for students and improve student achievement? (See question 3.A.ii to review the adopted guidelines for consistency with Principle 3.)

3.A.i, Option B.i Panel Response

Not applicable because the SEA selected 3.A, Option A

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The guidelines adopted for ADE include each of the requirements of Principal 3. These are supported by enacting legislation and followed by the State Board's adoption of the Framework to implement the evaluation system. The Framework includes both the goals for a fully implemented system and transitional measures to be utilized across LEAs until all parts of the system are fully operational (particularly in reference to non-state tested grades and subjects). The Framework includes national standards for instructional and leadership practice and provides specificity with local flexibility in meeting standards for use of student growth data, which comprises 33-50 percent of each teacher's evaluation.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • The guidelines adopted for ADE include each of the requirements of Principal 3. These are supported by enacting legislation and followed by the State Board’s adoption of the Framework to implement the evaluation system and enacting legislation. Student progress must comprise 33-50 percent of each teacher’s evaluation. • The Framework includes national standards for instructional and leadership practice and provides specificity with local flexibility in meeting standards. • The Framework includes both the goals for a fully implemented system and transitional measures to be utilized across LEAs until all parts of the system are fully operational (particularly in reference to non-state tested grades and subjects). • The SEA has incorporated in its Framework professional development leadership academies (p. 151). • The SEA has established an assessment team to identify and develop valid assessments and performance measures to be used in the evaluation of teachers and leaders of English Learners and student with disabilities.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • While the Framework includes the adoption by ADE of the Interstate Teacher Assessment and Support Consortium (InTASC) and Interstate School Leaders Licensure Consortium (IsLLC) standards, not as much detail is provided in the implementation of those standards through observable instructional behaviors or evidence in the Framework. • The Framework lacks specific attention to broad issues of equity and student achievement, including issues of cultural and linguistic student diversity.
<i>Technical Assistance Suggestions</i>	None.

ii. Note to Peers: Staff will review ii.

iii. Did the SEA have sufficient involvement of teachers and principals in the development of these guidelines?

3.A.i, Option B.iii Panel Response

Not applicable because the SEA selected 3.A, Option A

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The Task Force established by the State Board to establish the Framework included many representatives of teachers and principals.
<i>Strengths</i>	<ul style="list-style-type: none"> • The Task Force established by the State Board to establish the Framework included many representatives of teachers and principals. • The SEA has identified workgroups and workgroup members which include teachers and principals.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • While the Task Force work was focused and productive and it included many teacher and principal representatives, it is not clear how individual teachers and principals were able to provide input or to access information during the Task Force proceedings.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Surveying teachers throughout the implementation process can improve buy in and execution of the evaluation system. • ADE should consider an extended pilot, if possible, to implementation, which could help refine the Framework with feedback from teachers and principals.

ONLY FOR SEAs SELECTING OPTION B: If the SEA has adopted all guidelines for local teacher and principal evaluation and support systems by selecting Option B in section 3.A, review and respond to peer review question 3.A.ii below.

3.A.ii Are the SEA’s guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — *i.e.*, will they promote systems that:

a. Will be used for continual improvement of instruction ?

- *Are the SEA’s guidelines likely to result in support for all teachers, including teachers who are specialists working with students with disabilities and English Learners and general classroom teachers with these students in their classrooms, that will enable them to improve their instructional practice?*

3.A.ii.a Panel Response

Not applicable because the SEA selected 3.A, Option A

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA guidelines seem likely to result in supporting all teachers in their instructional practice, including teachers who are specialists working with students with disabilities and English Learners and general classroom teachers with these students in their classrooms.
<i>Strengths</i>	<ul style="list-style-type: none"> • The Framework details information for Group B (teachers of non-state tested grades and subjects) regarding student performance data and has set as a goal for LEAs to improve their local assessments, so that some may be used in teacher and principal evaluations. ADE has established a team to work specifically on assessment issues for teachers of English Learners and students with disabilities (p. 150). • The SEA has incorporated in their Framework professional development leadership academies (p. 151). • ADE is collaborating with the Southwest Comprehensive Center, WestEd, and other States in hosting a series of summits for their LEAs to help develop the evaluation tools and systems (p. 142).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Until the model observation instrument is adopted, peers cannot determine to what extent it will contribute to improved and targeted instruction for subgroups (pp. 84-85 of Appendix 11).
<i>Technical Assistance Suggestions</i>	None.

b. Meaningfully differentiate performance using at least three performance levels?

- *Does the SEA incorporate student growth into its performance-level definitions with sufficient weighting to ensure that performance levels will differentiate among teachers and principals who have made significantly different contributions to student growth or closing achievement gaps?*

3.A.ii.b Panel Response

Not applicable because the SEA selected 3.A, Option A

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The Framework differentiates teacher performance into four categories (Highly Effective, Effective, Partially Effective and Ineffective).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • The weighting of student growth results in the evaluation is such that the summative ratings will be based on these results in a significant way. The Framework also offers each LEA the option to include school- or department-wide results. • The State requires LEAs to report evaluation results using the four levels listed on page 145 (Highly Effective, Effective, Partially Effective and Ineffective). • The SEA is establishing the standards for each of the four performance levels, but it allows the LEAs to go beyond those levels.
<i>Weaknesses, issues, lack of clarity</i>	None.
<i>Technical Assistance Suggestions</i>	None.

- c. Use multiple valid measures in determining performance levels, including as a significant factor data on student growth for all students (including English Learners and students with disabilities), and other measures of professional practice (which may be gathered through multiple formats and sources, such as observations based on rigorous teacher performance standards, teacher portfolios, and student and parent surveys)?
- (i) Does the SEA have a process for ensuring that all measures that are included in determining performance levels are valid measures, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA?

3.A.ii.c(i) Panel Response

Not applicable because the SEA selected 3.A, Option A

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	ADE's plan largely meets this criterion, and actions that it has taken or proposes are all supported with a rationale.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • ADE has implemented a process to ensure its student growth measure selected for use in the evaluation system is valid, as required by the Framework (p. 146). • ADE will use the same growth measure (SGP) from its school accountability system for teacher and principal evaluation. • ADE has expressed a rationale for using this measure rather than a value-added measure or other calculation of growth, including that it has been and will continue to be implemented consistently across all schools and LEAs in the State. • ADE has scheduled a summit to address the topic of assessments for non-state tested grades and subjects. • ADE has adopted national standards (InTASC and IsLLC) for use in teaching and leadership performance determinations. • ADE proposes a number of measures of actual instructions that are related to increasing student performance.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • While ADE requires LEA rubrics in teaching performance to be based upon the State-adopted national standards, ADE does not provide any additional focus or guidance on which of the national standards is/are more likely to increase student academic achievement to help LEAs select or create rubrics. It may be that some of this work is being carried out under the Action Plan.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Because ADE has not yet determined how to implement assessments or growth calculations for non-state tested grades and subjects and is requiring schools to use school-wide State assessment results until measures for these areas are in place, ADE should consider annually evaluating the use of this measure in evaluations.

(ii) For grades and subjects in which assessments are required under ESEA section 1111(b)(3), does the SEA define a statewide approach for measuring student growth on these assessments?

3.A.ii.c(ii) Panel Response

Not applicable because the SEA selected 3.A, Option A

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	ADE has identified the same growth model used for its school accountability system (SGP) for use in its evaluation system. However, ADE needs to further investigate the validity of this measure for this purpose.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • ADE has identified the same growth model used for its school accountability system (SGP) and provides the rationale that it is used in all schools and LEAs consistently and is understood by educators.
<i>Weaknesses, issues, lack of clarity</i>	None.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • ADE should analyze the impact of using SGP for the purposes of teachers' accountability. • ADE should monitor the validity of using SGP by correlating it to observable measures of teacher effectiveness.

(iii) For grades and subjects in which assessments are not required under ESEA section 1111(b)(3), does the SEA either specify the measures of student growth that LEAs must use or select from or plan to provide guidance to LEAs on what measures of student growth are appropriate, and establish a system for ensuring that LEAs will use valid measures?

3.A.ii.c(iii) Panel Response

Not applicable because the SEA selected 3.A, Option A

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	ADE has selected the measure LEAs must use for teachers of non-state tested grades and subjects in the beginning of implementation and is working to improve measures for these grades and subjects.
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA has a transitional measure of using department- or school-wide State assessment data for teachers of non-state tested grades and subjects. And, ADE has established a team to work on these assessment issues, followed up by a second statewide summit focused on this topic.
<i>Weaknesses, issues, lack of clarity</i>	None.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Because ADE has not yet determined how to implement assessments or growth calculations for non-state tested grades and subjects and is requiring schools to use school-wide State assessment results until measures for these areas are in place, ADE should consider annually evaluating the use of this measure in evaluations.

d. Evaluate teachers and principals on a regular basis?

3.A.ii.d Panel Response

Not applicable because the SEA selected 3.A, Option A

Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	ADE's regulations require that teachers and principals are evaluated once per year.
Strengths	<ul style="list-style-type: none"> ADE's regulations require that teachers are evaluated once per year. In addition, ADE has presented multiple measures and multiple observations as a best practice to LEAs (p 151).
Weaknesses, issues, lack of clarity	None.
Technical Assistance Suggestions	None.

e. Provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development?

- Will the SEA's guidelines ensure that evaluations occur with a frequency sufficient to ensure that feedback is provided in a timely manner to inform effective practice?
- Are the SEA's guidelines likely to result in differentiated professional development that meets the needs of teachers?

3.A.ii.e Panel Response

Not applicable because the SEA selected 3.A, Option A

Tally of Peer Responses: 4 Yes, 2 No

Response Component	Peer Panel Response
Rationale	The enabling legislation requires LEAs to relate professional development to the evaluation system. The Framework requires LEAs to provide professional development to teachers on the State-adopted standards. The Task Force established the use of evaluation data to drive professional development as a goal. However, some peers feel that, without specificity in the guidelines guaranteeing feedback, this criterion may not be fully met.
Strengths	<ul style="list-style-type: none"> The enabling legislation requires LEAs to relate professional development to the evaluation system. The Framework requires LEAs to provide professional development to teachers on the State-adopted standards. The Task Force established the use of evaluation data to drive professional development as a goal. The SEA is planning to create professional development leadership academies and provide opportunities for LEAs to participate in regional professional development to increase their capacity in supporting teachers and principals.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Details for a plan for assisting LEAs in linking professional development specifically to evaluation results (including formative observations) are not provided. • The compressed timeline presents challenges for the SEA to help LEAs develop their feedback processes.
<i>Technical Assistance Suggestions</i>	None.

f. Will be used to inform personnel decisions?

3.A.ii.f Panel Response

Not applicable because the SEA selected 3.A, Option A

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The request states that a new law enacted in 2009 prohibits local agreements from employing tenure or seniority as a primary reason for retention and eliminates “last in first out” processes.
<i>Strengths</i>	<ul style="list-style-type: none"> • The request states that a new law enacted in 2009 prohibits local agreements from employing tenure or seniority as a primary reason for retention and eliminates “last in first out” processes. • ADE’s request indicates that the laws cited on page 153 reflect that a “valid evaluation” be the basis for starting due process for dismissal for incompetence. • ADE indicated in the call with peers on March 28, 2012) that the evaluation is the “most important thing” in making personnel decisions.
<i>Weaknesses, issues, lack of clarity</i>	None.
<i>Technical Assistance Suggestions</i>	None.

3. B Ensure LEAs Implement Teacher and Principal Evaluation and Support Systems

3.B Is the SEA’s process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, evaluation and support systems consistent with the SEA’s adopted guidelines likely to lead to high-quality local teacher and principal evaluation and support systems?

- *Does the SEA have a process for reviewing and approving an LEA’s teacher and principal evaluation and support systems to ensure that they are consistent with the SEA’s guidelines and will result in the successful implementation of such systems?*
- *Does the SEA have a process for ensuring that an LEA develops, adopts, pilots, and implements its teacher and principal evaluation and support systems with the involvement of teachers and principals?*
- *Did the SEA describe the process it will use to ensure that all measures used in an LEA’s evaluation and support systems are valid, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA (i.e., process for ensuring inter-rater reliability)?*
- *Does the SEA have a process for ensuring that teachers working with special populations of students, such as students with disabilities and English Learners, are included in the LEA’s teacher and principal evaluation and support systems?*
- *Is the SEA’s plan likely to be successful in ensuring that LEAs meet the timeline requirements by either (1) piloting evaluation and support systems no later than the 2013–2014 school year and implementing evaluation and support systems consistent with the requirements described above no later than the 2014–2015 school year; or (2) implementing these systems no later than the 2013–2014 school year?*
- *Do timelines reflect a clear understanding of what steps will be necessary and reflect a logical sequencing and spacing of the key steps necessary to implement evaluation and support systems consistent with the required timelines?*
- *Is the SEA plan for providing adequate guidance and other technical assistance to LEAs in developing and implementing teacher and principal evaluation and support systems likely to lead to successful implementation?*
- *Is the pilot broad enough to gain sufficient feedback from a variety of types of educators, schools, and classrooms to inform full implementation of the LEA’s evaluation and support systems?*

3.B Panel Response

Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	The SEA has addressed the sub-criteria for ensuring that LEAs will develop, adopt, pilot and implement their specific personnel evaluation systems.

<p><i>Strengths</i></p>	<ul style="list-style-type: none"> • <u>Review/Approval Process.</u> The Framework requires that ADE review implementation of LEAs in corrective action or are identified as persistently low achieving. ADE is contracting with WestEd to develop a system for monitoring and reviewing LEA implementation of the Framework. LEA Title II plans must include the process for implementing the Framework and equitable distribution of effective teachers using evaluation results. The application also requires a budget linked to these activities. • <u>Ensuring teacher and principal involvement.</u> Section 15-537 requires that each LEA include certified teachers in the development and monitoring of its teacher evaluation system. • <u>Ensuring valid and reliable measures of performance.</u> The three summits being implemented focus on areas of valid and reliable student assessments in all grades and subjects and have included (and will include) teams from all LEAs. • <u>Ensuring special population teachers are included in LEA support.</u> The state has not yet determined how to fully implement assessments or growth calculations for non-state tested grades and subjects. In the meantime, transitional measures of using department- or school-wide State assessment data are required. Additionally, ADE has established a team to work on these assessment issues, including teachers of special populations, followed up by a second statewide summit focused on this topic. • <u>Timeline meets waiver dates and reflects logical sequencing.</u> All timelines provided include logical sequencing. • <u>SEA guidance and support to LEAs for development and implementation.</u> SEA supports for LEA success are very thorough in the areas of student growth measures (detailed implementation plans for Group A and Group B teachers, for example) and communications outreach. These include training in communications, summits on evaluation system development and student growth measures, electronic resources posted on its web site and an email address through which to ask additional questions. The SEA will provide a model evaluation rubric for Groups A and B teachers.
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<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • <u>Review/Approval Process</u>. Review and approval are not being completed on the front end for all LEAs. • <u>Ensuring teacher and principal involvement</u>. The ADE relies on the LEA Title II application where LEAs are required to include teachers and principals in the development of the application for Title IIA funds, which now requires implementation of the Framework. • <u>Ensuring valid and reliable measures of performance</u>. Some peers questioned the use of school-wide data for individual teacher evaluation, even as a transition system. • <u>Timeline meets waiver dates and reflects logical sequencing</u>. It is not clear how much time LEAs will have to decide whether to adopt the State model instructional practice instrument if it is piloted in May prior to statewide roll out. The SEA may not have provided adequate time for LEAs to implement a feedback loop. • <u>Effective piloting</u>. The pilot of the evaluation system rubric will be conducted for only one month in only two schools in May prior to full statewide rollout.
<i>Technical Assistance Suggestions</i>	None.

Principle 3 Overall Review

If the SEA indicated that it has not developed and adopted all guidelines for local teacher and principal evaluation and support systems consistent with Principle 3 by selecting Option A in section 3.A, is the SEA’s plan for the SEA’s and LEAs’ development and implementation of teacher and principal evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

If the SEA indicated that it has adopted guidelines for local teacher and principal evaluation and support systems consistent with Principle 3 by selecting Option B in section 3.A, are the SEA’s guidelines and the SEA’s process for ensuring, as applicable, LEA development, adoption, piloting, and implementation of evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

Principle 3 Overall Review Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
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<i>Rationale</i>	Arizona’s legislation and regulations clearly support the criteria in Principle 3. In areas that need additional attention, ADE has either selected transitional implementation procedures or is implementing plans to improve regulations and the LEAs’ capacity to implement them, or both. ADE has developed and is implementing extensive capacity-building activities for its LEAs to enable development and implementation of teacher and principal evaluation and support systems.
<i>Strengths</i>	<ul style="list-style-type: none"> • Adoption of guidelines in law and rule that support Principle 3. • Implementation plans that support LEA development and understanding of the new evaluation system. • Communication materials for use with the evaluation system.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • There may not be ample time for LEAs to have local teams work on the development or selection of instructional practice observation tools, even after the ADE provides a model.
<i>Technical Assistance Suggestions</i>	None.

Overall Request Evaluation

Did the SEA provide a comprehensive and coherent approach for implementing the waivers and principles in its request for the flexibility? Overall, is implementation of the SEA’s approach likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

Overall Request Evaluation Panel Response

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	While ADE provided evidence of a comprehensive approach for implementing the waivers and principles (particularly Principles 1 and 3), there are some serious concerns about the core of the school rating system as detailed under Principle 2.
<i>Strengths</i>	<ul style="list-style-type: none"> • ADE’s plan for implementing Principle 1 was coherent, thorough, and well-documented. In particular, the SEA has strong efforts underway to ensure students with disabilities will access the new standards. • ADE’s plan for implementing a teacher and principal evaluation system is well supported by legislation and provides solid guidelines and support for LEAs to develop their own systems. • ADE’s intervention system is extremely well developed, based on data, and has an extensive professional development system of support.

<p><i>Weaknesses, issues, lack of clarity</i></p>	<ul style="list-style-type: none"> • ADE has not adequately explained how the two growth measures will be transformed into points to calculate school ratings. • ADE’s plan lacks an emphasis on graduation rates and gaps in achievement in subgroups given the SEA’s demographics and attended linguistic and cultural diversity. • There is a significant number of schools (417 small, K-2, alternative schools) that are not presently included in the accountability system and there is not a transition plan for including them in the new accountability system. • The cut scores for schools in the accountability system lack rigor, in particular for the designation of reward school status. • The rationale for setting AMOs was not explained. The AMOs for subgroups were at times overly ambitious and at other times were under-ambitious. • ADE has not provided a rationale for why it is using school-wide State assessment results as a required transitional measure for teachers of non-state tested grades and subjects.
<p><i>Technical Assistance Suggestions</i></p>	<p>None.</p>