
ESEA Flexibility

Peer Panel Notes



State Request: Colorado

Date: 12/06/11

Note: These peer comments reflect the views of the seven peers that comprised the panel that reviewed the SEA's initial submission as well as any additional materials provided by the SEA prior to and during the December 5–9, 2011 on-site peer review. Taking these comments into consideration, the U.S. Department of Education provided feedback to the SEA about aspects of the SEA's ESEA flexibility request that needed additional development or clarification. These peer notes do not reflect the peers' views on any materials, clarifications, or modifications received from the SEA following the peer review. Moreover, although the peer notes inform the Secretary's consideration of each SEA's request, the Secretary makes the final decision whether to grant an SEA's request for ESEA flexibility. For both of these reasons, these peer notes may not align with the determination made by the Secretary.

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 <i>Tally of Peer Responses: 7 Yes, 0 No</i>	
<i>Rationale</i>	The Colorado Department of Education (CDE) engaged teachers and union leadership on the components of the proposal in multiple ways and identified ways in which feedback has been used.
<i>Strengths</i>	<p>Examples of teacher engagement on the State statute at the core of this proposal include the CAP4K teacher tour conducted in collaboration with the Colorado Education Association, and teacher representation on the Assessment Stakeholder Committee, the Colorado Accountability Project, and the State Council for Educator Effectiveness.</p> <p>Feedback on the waiver request was solicited from the CEA, the NCLB Committee of Practitioners, and groups representing administrators.</p> <p>The working documents of these and other relevant stakeholder convenings are made available on the CDE website, and notices inviting comment on the waiver request, public and stakeholder comments received, and letters of support are provided in the application.</p> <p>The request also identifies specific changes to the proposal that were made as a result of feedback received, including incorporating measures of English language proficiency into the State’s performance frameworks.</p>
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	

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 <i>Tally of Peer Responses:</i> 6 Yes, 1 No	
<i>Rationale</i>	The SEA did considerable stakeholder outreach and identified ways that feedback was incorporated into the proposal. However, there is not evidence of specific outreach to civil rights organizations.
<i>Strengths</i>	<p>Examples of diverse stakeholder engagement include soliciting feedback from businesses and parents on the postsecondary and workforce readiness description and business, military, and CBO representation on the Assessment Stakeholder Committee. Feedback on the waiver request was solicited at the MEGA meeting of English Learners (ELs) stakeholders and the Colorado Special Education Advisory Council.</p> <p>The request identifies specific changes to the proposal that were made as a result of feedback received, including modifying SES/choice requirements rather than waiving them, including additional disaggregation of results, and incorporating measures of English language proficiency into the State’s performance frameworks.</p>
<i>Weaknesses, issues, lack of clarity</i>	The request does not provide evidence of significant outreach to civil rights organizations.
<i>Technical Assistance Suggestions</i>	Please provide evidence on any other outreach to advocacy organizations, feedback that was generated from that outreach, and ways it was used.

Overview

Note to Peers: Staff will review Questions 1 and 3

2. Does the SEA’s overview sufficiently explain the SEA’s comprehensive approach to implementing the waivers and principles and describe the Sea’s strategy for ensuring that this approach is coherent?

OVERVIEW QUESTION 2 PANEL RESPONSE <i>Tally of Peer Responses:</i> 0 Yes, 7 No	
<i>Rationale</i>	The overview focuses exclusively on the accountability proposal and does not address standards and assessment or educator evaluation.
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	Rework overview to include information about CAP4K, SB-191, or any other information related to Principles 1 and 3 of the waiver request.

Principle 1: College- and Career-Ready Expectations for All Students

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 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, and likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with such standards?

A high-quality plan will likely include activities related to the following questions or an explanation if one or more of the activities is not included. For the activities below that the SEA selects, will the results be used to inform the intended outcome?

- *Does the SEA intend to analyze the extent of alignment between the State’s current content standards and the college- and career-ready standards to determine similarities and differences between those two sets of standards? If so, will the results be used to inform the transition to college- and career-ready standards?*
- *Does the SEA intend to analyze the linguistic demands of the college- and career-ready standards to inform the development of ELP standards corresponding to the college- and career-ready standards and to ensure that English Learners will be able to access the college- and career-ready standards? If so, will the results be used to inform revision of the ELP standards and support English Learners in accessing the college- and career-ready standards?*
- *Does the SEA intend to analyze the learning and accommodation factors necessary to ensure that students with disabilities will have the opportunity to achieve to the college- and career-ready standards? If so, will the results be used to support students with disabilities in accessing the college- and career-ready standards on the same schedule as all students?*
- *Does the SEA intend to conduct outreach on and dissemination of standards? If so, does the SEA’s plan reach the appropriate stakeholders, including educators, administrators, families, and IHEs? Is it likely that the plan will result in all stakeholders increasing their awareness of the State’s college- and career-ready standards?*
- *Does the SEA intend to provide professional development and other supports to prepare teachers to teach all students, including English Learners, students with disabilities, and low-achieving students, to the new standards? If so, will the planned professional development and supports prepare teachers to teach to the new standards, use instructional materials aligned with those standards, and use data on multiple measures of student performance (e.g., data from formative, benchmark, and summative assessments) to inform instruction?*
- *Does the SEA intend to provide professional development and supports to prepare principals to provide strong, supportive instructional leadership based on the new standards? If so, will this plan prepare principals to do so?*

- *Does the SEA propose to develop and disseminate high-quality instructional materials aligned with the new standards? If so, are the instructional materials designed (or will they be designed) to support the teaching and learning of all students, including English Learners, students with disabilities, and low-achieving students?*
- *Does the SEA plan to expand access to college-level courses or their prerequisites, dual enrollment courses, or accelerated learning opportunities? If so, will this plan lead to more students having access to courses that prepare them for college and a career?*
- *Does the SEA intend to work with the State’s IHEs and other teacher and principal preparation programs, to better prepare*
 - *incoming teachers to teach all students, including English Learners, students with disabilities, and low-achieving students, to the new college- and career-ready standards; and*
 - *incoming principals to provide strong, supportive instructional leadership on teaching to the new standards?*

If so, will the implementation of the plan likely improve the preparation of incoming teachers and principals?
- *Does the SEA plan to evaluate its current assessments and increase the rigor of those assessments and their alignment with college- and career-ready standards, in order to better prepare students and teachers for the new assessments through one or more of the following strategies:*
 - *Raising the State’s academic achievement standards on its current assessments to ensure that the adjusted achievement standards reflect a level of postsecondary readiness, or are being increased over time to that level of rigor (e.g., the SEA might compare current achievement standards to a measure of postsecondary readiness by back-mapping from college entrance requirements or remediation rates, analyzing the relationship between proficient scores on the State assessments and the ACT or SAT scores accepted by most of the State’s 4-year public IHEs, or conducting NAEP mapping studies)?*
 - *Augmenting or revising current State assessments by adding questions, removing questions, or varying formats in order to better align those assessments with college- and career-ready standards?*
 - *Implementing another strategy to increase the rigor of current assessments, such as using the “advanced” performance level on State assessments instead of the “proficient” performance level as the goal for individual student performance?*

Is this activity likely to result in an increase in the rigor of the assessments and their alignment with college- and career-ready standards?
- *Does the SEA propose other activities in its transition plan? If so, is it likely that these activities will support the transition to and implementation of college- and career-ready standards?*

1.B PANEL RESPONSE <i>Tally of Peer Responses:</i> 5 Yes, 2 No	
<i>Rationale</i>	<p>The proposal is coherent and comprehensive, with well-articulated responsibilities and timeframes for the transition. However, greater specificity would give some members of the panel more confidence in its effective implementation, specifically with regards to two areas: professional development for all content teachers to ensure that they are prepared to teach diverse student populations, including ELs and students with disabilities (SWDs), to enable equitable access to the content of the new standards; and professional development for educators that ensures that they know, understand and can teach the new standards.</p>
<i>Strengths</i>	<p>As required by CAP4K, the Colorado State Board of Education and the Colorado Commission on Higher Education co-adopted a definition of postsecondary and workforce readiness, indicating P-20 collaboration.</p> <p>CDE contracted an alignment study between the Colorado Academic Standards and the Common Core State Standards.</p> <p>CDE provided extensive professional development and outreach about the transition to the new standards, both face-to-face, such as the Regional Awareness Trainings, and online, such as the archived online “office hours.”</p> <p>The transition plan outlined on page 26 of the request provides a clear articulation of the responsibilities of CDE, districts and teachers in each of the years leading up to full implementation of Common Core State Standards, along with information on assessment transition. This plan is supported by the online Standards Implementation Toolkit.</p> <p>The requirement that all educator preparation programs align their courses to Common Core State Standards by December 2012 will support a smooth transition, as will efforts to align preparation, induction and licensure to the new standards.</p> <p>CDE’s decision to use a transitional assessment (TCAP) demonstrates a promising approach to better aligning current assessment tools with the new Colorado Academic Standards in advance of the new statewide assessment.</p> <p>Through the Content Collaborative, CDE has a plan to create and disseminate standards-based instructional materials aligned with the new standards.</p> <p>CDE’s accommodation manual and professional development on instructional accommodations should help SWDs gain greater access to the new career and college ready standards.</p>

1.B PANEL RESPONSE*Tally of Peer Responses:**5 Yes, 2 No*

<i>Weaknesses, issues, lack of clarity</i>	<p>The professional development and training is not described in detail, nor is there a description of its delivery, length, depth, breadth, or requirements for participants to demonstrate their knowledge and understanding, or their ability to apply their knowledge; strong professional development is essential for effective implementation at the local level.</p> <p>Some peers feel that the Content Collaborative is not a sufficiently robust strategy for developing and disseminating instructional materials given the role local decision-making plays in statewide implementation.</p> <p>Some of the information provided does not offer convincing evidence for CDE’s decision not to increase the cut scores on the CSAP.</p> <p>There is a lack of an integrated professional development approach to ensure that all content teachers are well equipped to teach content as well as use differentiated instructional strategies to assure ELs and SWDs have equitable access to common core standards.</p> <p>The information provided about planned outreach to and engagement of parents in collaboration with the Colorado PTA is minimal.</p>
<i>Technical Assistance Suggestions</i>	<p>Develop and provide information about an integrated professional development plan to ensure all teachers are able to deliver content instructional strategies to diverse student populations, including ELs and SWDs, in order to differentiate according to student need, ie., delivery, timing, breadth, depth, checking for understanding, and an opportunity to practice.</p>

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	
<i>Tally of Peer Responses:</i>	
NA	
<i>Rationale</i>	
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	
<input checked="" type="checkbox"/> <i>Not applicable because the SEA selected 1.C, Option A or Option C</i>	

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 <i>Tally of Peer Responses:</i> 5 Yes, 2 No	
<i>Rationale</i>	The proposal is coherent and comprehensive, with articulated state, district, and teacher responsibilities and timeframes for transition. However, greater specificity about professional development is needed to give some members of the panel more confidence in its effective implementation.
<i>Strengths</i>	<p>The plan detailed on page 26 provides a clear picture of responsibilities for CDE, districts and teachers in each of the years leading up to full implementation of Colorado Academic Standards, along with information on assessment transition. This plan is supported by the online Standards Implementation Toolkit.</p> <p>The requirement that all preparation programs align their courses to the Colorado Academic Standards by December 2012 will support a smooth transition, as will efforts to align preparation, induction and licensure to the new standards.</p> <p>As required by CAP4K, the Colorado State Board of Education and the Colorado Commission on Higher Education co-adopted a definition of postsecondary and workforce readiness, indicating P-20 collaboration.</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>The professional development and training is not described in detail, nor is there a description of its delivery, length, depth, breadth, or requirements for participants to demonstrate their knowledge and understanding, or their ability to apply their knowledge; strong professional development is essential for effective implementation at the local level.</p> <p>There is a lack of an integrated professional development approach to ensure that all content teachers are well equipped to teach content as well as use differentiated instructional strategies to assure ELs and SWDs have equitable access to common core standards.</p>
<i>Technical Assistance Suggestions</i>	Develop and provide information about an integrated professional development plan to ensure all teachers learn how to teach in ways that will enable diverse learners to learn the content of the Common Core State Standards, including detailing delivery, timing, breadth, depth, checking for understanding, and an opportunity to practice.

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?

2.A.i PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 5 Yes, 2 No	
<i>Rationale</i>	The School and District Performance Frameworks coupled with the Unified Improvement Plan (UIP) constitute a comprehensive and well-articulated system of expectations, supports, and interventions, but some members of the panel are concerned about technical aspects of the student growth calculation, the weighting of growth compared to status, and the median growth percentile (MGP) needed to achieve a “meets” designation for overall growth and growth gaps.
<i>Strengths</i>	<p>School and district performance expectations are clearly defined by the performance frameworks.</p> <p>The frameworks create expectations for status achievement, growth, and college and career readiness.</p> <p>Some peers believe that the interaction of the (MGPs) and Adequate Growth Percentiles (AGPs) communicate an expectation that all students make sufficient growth to “catch up” to standard if they are not yet proficient or “keep up” if they are already proficient.</p> <p>The college and career readiness indicators used for high school accountability determinations are appropriate measures.</p> <p>SchoolView is a robust, accessible public reporting tool, and CDE has created useful materials for understating the school performance frameworks (SPF), including the online SPF tutorial.</p> <p>The Unified Improvement Plan (UIP) is a structured, data-based problem solving approach for schools to address the instructional needs of all students. It encourages operationalized and evidence based intervention planning with benchmark targets.</p>

2.A.i PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 5 Yes, 2 No	
<i>Weaknesses, issues, lack of clarity</i>	<p>Some panel members are concerned that the modeling error is not accounted for in the growth calculations; particularly those related to the growth to standard component that assumes that a student’s future performance level can be estimated perfectly.</p> <p>Some members of the panel see the required MGP for earning a “meets” designation on overall growth and growth gaps as too low, especially given the heavy weighting of growth in the frameworks.</p> <p>The low weighting of status proficiency in the frameworks is a concern for some members of the panel, especially when the points accumulated in the overall achievement category are divided among four subjects and the alternate assessment.</p> <p>The absence of status proficiency expectations for subgroups in the frameworks is a concern.</p> <p>There is no specified trigger for the State Board to adopt new, higher AMOs.</p>
<i>Technical Assistance Suggestions</i>	<p>Given the complexity of the proposed system, the SEA will want to continue to run simulations and monitor results for the purpose of identifying and remedying unintended consequences of the calculation, determining stability of ratings over years and making adjustments to the calculations, specifically focusing on the projected performance levels of students more than one year into the future.</p> <p>Provide a rationale for setting the threshold for determining the performance category cut points at the 15th, 50th, and 90th percentiles.</p> <p>Methods of monitoring the fidelity of implementation of the UIP by the SEA and LEA bends need to be delineated.</p>

- 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?

<p>2.A.i.a PANEL RESPONSE Tally of Peer Responses: 5 Yes, 2 No</p>	
Rationale	The proposed system technically incorporates all required elements.
Strengths	<p>The system includes student performance in mathematics, ELA, writing, science and English language proficiency, as well as graduation rates and other measures of college and career readiness in high school.</p> <p>The system values both status achievement and academic growth.</p> <p>There are growth expectations for currently proficient students as well as students not yet proficient.</p>
Weaknesses, issues, lack of clarity	<p>In high schools only 15% of the overall score is based on status proficiency. Some peers feel that this low weighting, combined with the fact that overall achievement points are distributed across four subjects, dilutes the emphasis on achieving standards in reading and math.</p> <p>The status achievement of subgroups is not incorporated in the frameworks, either on statewide assessments or the ACT.</p> <p>Some panel members consider it a weakness that there is no plan to assess growth for the students with significant cognitive disabilities taking alternate assessments.</p> <p>Some panel members believe that there is an over-reliance (66% in ES/MS and 50% in HS) on growth in the proposed system resulting in minimal attention paid to proficiency.</p> <p>Some panel members believe that there is an over-reliance on normative growth in the proposed system. This results in comparisons only to other students rather than to standards resulting in annual changes to cut points for performance categories, the perpetual designation of Does Not Meet and Exceeds irrespective of improvements or declines in the State, and does not allow for meaningful longitudinal reporting of the percent meeting each performance category.</p> <p>The naming conventions for school performance ratings (turnaround, priority improvement, etc) are not aligned with the performance designations used in the rest of the system (does not meet, meet, etc. This could create confusion.</p>

<p>2.A.i.a PANEL RESPONSE Tally of Peer Responses: 5 <i>Yes</i>, 2 <i>No</i></p>	
<p>Technical Assistance Suggestions</p>	<p>Consider naming conventions for school performance ratings that are better aligned with the rest of the system and that are stronger indicators of school performance (i.e., meets expectations, exceeds expectations, does not meet expectations).</p> <p>Consider developing a way to assess growth for the students with significant cognitive disabilities taking alternate assessments.</p> <p>Consider changing the weighting of proficiency in the overall calculation for the accountability model.</p> <p>Consider a more balanced approach of weighting AGP and MGP in the growth calculations.</p>

- b. Do the SEA’s differentiated recognition, accountability, and support system create incentives and provide support to close achievement gaps for all subgroups of students?

2.A.i.b PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 4 Yes, 3 No	
<i>Rationale</i>	There is a mixed opinion on the panel of whether the design of the school performance frameworks creates sufficient incentives to raise achievement and to close achievement gaps for all groups of students.
<i>Strengths</i>	Some of the panel members see the use of the AGP as an effective way to communicate an expectation that all students make growth to standard within a defined timeframe, and see the inclusion of the growth gaps indicator as a strong expectation that all groups of students make the growth necessary to catch up to proficiency if they’re not already proficient and keep up if they are. There is a differentiated system of support that articulates the supports schools and districts receive dependent on the plan type classification.
<i>Weaknesses, issues, lack of clarity</i>	Some members of the panel see the heavy reliance on normative growth as a weakness, as well as the weighting of growth in the proposed system. Some members see the low MGP required to earn a “meets” designation in growth gaps (either 45 th percentile or 55 th percentile, depending on the AGP) as too low. For example, what this says is that for a group that we know is not on-track to proficiency within 3 years or by 10 th grade, because the MGP is less than the AGP, making 55 th percentile growth is enough. The status proficiency of student subgroups is not accounted for in the school performance frameworks, either on statewide assessments or the ACT.
<i>Technical Assistance Suggestions</i>	Consider including more incentives to improve performance of all subgroups(e.g., have a status expectation for subgroups). Consider raising the MGP necessary to earn a “meets” designation on growth gaps, especially for schools where the MGP is less than the AGP.

- c. Does the SEA’s differentiated recognition, accountability, and support system include interventions specifically focused on improving the performance of English Learners and students with disabilities?

2.A.i.c PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 5 Yes, 2 No	
<i>Rationale</i>	The proposal is clear on how recognition and accountability work for ELs and SWDs, but some members of the panel had concerns about supports for teachers.
<i>Strengths</i>	Problem solving-approach is built on careful analysis of student achievement and growth through plans with assistance from school support teams and managers.
<i>Weaknesses, issues, lack of clarity</i>	<p>Proposal lacks information on support for all teachers – not just ESL and Special Education teachers – to provide appropriate interventions based on the needs of ELs and SWDs educated in general education settings.</p> <p>Some panel members are concerned that students with significant disabilities who take the alternate assessment are only included in the status component of the accountability system.</p> <p>The proposal confirms CDE’s commitment to providing English acquisition services and professional development to cross-unit teams in order to support the educators’ consideration and understanding of linguistic demands while teaching challenging content. While this is important, it is not sufficient for ensuring access for ELs to learning the challenging content in the college and career ready standards. The panel feels that all content teachers need to be fluent in utilizing non-language multi-modal methods consistent with the needs of their ELs to convey meaning related to all content, especially content beyond English language proficiency and reading, and content that is more complex.</p>
<i>Technical Assistance Suggestions</i>	<p>Per the conference call on 12/7/11, CDE submitted additional detail on interventions focused on turnaround principles. The State should consider providing more detail on evidence-based interventions for use with ELs and SWDs.</p> <p>Consider options to include the progress of SWDs who take the alternate assessment in the performance frameworks.</p> <p>Consider delineating specific professional development for all teachers regarding strategy and differentiated instruction, especially as it relates to students at risk for failure, ELs and SWDs.</p> <p>Provide professional development for school leaders and all content teachers that explains how to teach challenging content when ELs and students with literacy and language processing problems don’t have access to the language typically used to explain the content.</p>

- d. Did the SEA provide a plan that ensures that the system will be implemented in LEAs and schools no later than the 2012-2013 school year?

2.A.i.d PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	The school and district performance frameworks and UIP are already being implemented per State statute.
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	

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?
- Did the SEA provide the percentage of students in the “all students” group that performed at the proficient level on the State’s most recent administration of each additional assessment for all grades assessed?
 - 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?

2.A.ii (INCLUDING QUESTIONS a AND b)	
PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	The frameworks weights ELA, Math, science and writing equally in the overall achievement category. The frameworks weight writing, reading and math equally in growth measures. Composite ACT performance is included in the college and career readiness category for high schools. Data on student performance on each assessment is provided.
<i>Strengths</i>	The request includes the percentages of students at the proficient level in reading and math, as well as MGPs and AGPs in those subjects, both overall and for student groups. The request also includes overall proficiency rates, MGPs, and AGPs for writing, overall proficiency rates for science, the percentage of student at each achievement level, MGPs, and AGPs on the CELApro, and the statewide ACT composite mean. Equal weighting of the subjects within the overall achievement and growth gaps measures communicates that each of these core content areas are important to the goal of college readiness for all.
<i>Weaknesses, issues, lack of clarity</i>	The request does not include disaggregated MGPs and AGPs in writing, a subject that is incorporated in the growth gaps calculation.
<i>Technical Assistance Suggestions</i>	
<input type="checkbox"/> <i>Not applicable because the SEA selected 2.A, Option A</i>	

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?

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 AND 2.B, OPTION C (INCLUDING QUESTIONS i–iv) PANEL RESPONSE Tally of Peer Responses: 0 Yes, 7 No	
Rationale	<p>AMOs for proficiency are established separately in reading, math, writing, and science. However, it does not appear that the AMOs meet the waiver requirements because they do not represent expectations for a pre-defined pattern of academic progress over time. For example, AMOs for 2015-16 are not currently established. Rather, the State Board makes the decision to re-set or reaffirm (i.e., hold in place) the AMOs each year. Moreover, while subgroup growth is incorporated into the frameworks, the identified AMOs for status proficiency apply only to students overall, not subgroups.</p>
Strengths	<p>While the AMOs do not meet the technical waiver requirements, some peers feel that setting three performance thresholds – at the 15th, 50th, and 90th percentiles of proficiency—allows for meaningful differentiation among different types of schools. This differentiation creates conditions for effective performance management, with supports and intervention prioritized to those schools most in need, and earned autonomy and recognition for higher-performing schools.</p> <p>Likewise, some peers feel that the equal weighting of growth gaps and status proficiency in the frameworks means that subgroup expectations are an important part of the system, even though they are not part of the AMOs.</p>
Weaknesses, issues, lack of clarity	<p>Without a commitment to annually raising the AMOs, schools do not have annual improvement targets; without annual improvement targets, there is less incentive for improvement. For example, schools that are at the low end of the “approaching” category may have little incentive to try and get to “meets” because the difference between the 16th percentile and the 49th percentile is so large.</p> <p>The identified AMOs for status proficiency do not apply to subgroups, only to students overall.</p>
Technical Assistance Suggestions	<p>Set an annual requirement for raising AMOs.</p> <p>Set status proficiency AMOs for subgroups and include performance against those AMOs in the performance frameworks.</p>
<input type="checkbox"/> Not applicable because the SEA selected 2.B, Option A or Option B	

2.C Reward Schools

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

2.C.iii Did the SEA describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools?

- *Has the SEA provided a reasonable explanation of why its proposed recognition and, where applicable, rewards are likely to be considered meaningful by schools? For example, 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: 7 Yes, 0 No	
Rationale	The proposal calls for identification of five categories of schools as high progress and high performance, and provides incentives focused on public recognition and financial awards for some categories.
Strengths	The criteria for the different reward categories value both overall and subgroup achievement, thus ensuring that reward schools are successful with all groups of students.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

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?

<p>2.D.iii.a (INCLUDING QUESTIONS (i)-(vii)) PANEL RESPONSE <i>Tally of Peer Responses:</i> 5 Yes, 2 No</p>	
<p><i>Rationale</i></p>	<p>The interventions for priority schools align with many of the turnaround principles, and there are clear expectations for improvement for priority schools and consequences if they do not improve. However, the plan has insufficient attention to ensuring that priority schools have effective educators as well as to district responsibilities for supporting/intervening in priority schools.</p>
<p><i>Strengths</i></p>	<p>Some panel members consider it a strength that the SEA is identifying more than the minimum number of schools required in the priority category.</p> <p>Some of the UIP requirements align with the turnaround principles, including the data narrative, the root cause analysis based on causes the school can control (as opposed to describing student characteristics such as race or income), parental notification when a school is identified as priority, and the fact that those priority schools that are Turnaround (as opposed to priority Improvement) must employ a lead partner, have management conversion, or engage in other activities such as the four turnaround models in the School Improvement Grant program.</p> <p>There are clear improvement expectations for Priority schools, and clear consequences if they don't improve. Priority Schools are expected to improve enough to get to "meets" designations on the elements within the framework within five years and, per State statute, five consecutive years of being designated as a priority School triggers closure or management changes.</p> <p>Turnaround and priority schools must submit their UIP to CDE for review prior to posting on SchoolView.</p>

<p>2.D.iii.a (INCLUDING QUESTIONS (i)-(vii)) PANEL RESPONSE <i>Tally of Peer Responses:</i> 5 Yes, 2 No</p>	
<p><i>Weaknesses, issues, lack of clarity</i></p>	<p>Some members are concerned that the proportion of schools identified as Priority (one quarter of Title I schools) does not distinguish between the weakest schools and others.</p> <p>While the State Review Panel can consider “the readiness and apparent capacity of the school to plan effectively and lead the implementation of appropriate actions,” there is no articulation of how data from the new educator evaluation system will be used to make staffing decisions in priority schools.</p> <p>There is no articulation of district responsibilities for supporting/intervening in priority schools. The intervention model appears to bypass the district and go directly from state to school.</p> <p>There is no described process for CDE to monitor progress of Turnaround and Priority Schools on respective UIPs. However, additional information, based on the 12/7/11 call, provides evidence of a process.</p> <p>Some panel members were concerned that schools with different performance ratings can be designated as priority schools. As a result of the cut point for Approaching being set at the 15th percentile, the identification of priority schools results in the classification of 24% of all schools as priority schools. Therefore, there is a concern that some of the priority schools will also be classified as Turnaround, Priority Improvement, and possibly Improvement Plan.</p>
<p><i>Technical Assistance Suggestions</i></p>	<p>Utilize data from the teacher and leader evaluation systems to ensure that priority schools do not get staffed with ineffective educators.</p> <p>Articulate district responsibilities for intervening in/supporting priority schools.</p>

- b. Has the SEA identified practices to be implemented that meet the turnaround principles and are 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 <i>Tally of Peer Responses:</i> 5 Yes, 2 No	
<i>Rationale</i>	<p>The interventions for priority schools align with many of the turnaround principles, and there are clear expectations for improvement for priority schools and consequences if they do not improve. However, the plan has insufficient attention to ensuring that priority schools have effective educators as well as to district responsibilities for supporting/intervening in priority schools. In addition, some members of the panel are concerned that the UIP lacks detail on evidence-based interventions including interventions for ELs and SWDs.</p>
<i>Strengths</i>	<p>All priority schools must submit their UIPs to the CDE for review prior to posting on SchoolView.</p> <p>Some of the UIP requirements align with the turnaround principles, including the data narrative, the root cause analysis based on causes the school can control (as opposed to describing student characteristics such as race or income), parental notification when a school is identified as priority, and the fact that those priority Schools that are Turnaround (as opposed to priority Improvement) must employ a lead partner, have management conversion, or engage in other activities such as the four turnaround models in the School Improvement Grant program.</p> <p>UIP is a data-based, problem-solving process that if implemented with fidelity and monitored regularly may result in improved student achievement for all students, including ELs and SWDs.</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>While the State Review Panel can consider “the readiness and apparent capacity of the school to plan effectively and lead the implementation of appropriate actions,” there is no articulation of how data from the new educator evaluation system will be used to make staffing decisions in priority schools.</p> <p>There is no articulation of district responsibilities for supporting/intervening in priority schools. The intervention model appears to bypass the district and go directly from state to school.</p> <p>The strategy relies on the UIP process to generate interventions consistent with the turnaround principles, but there is no description or evidence that the interventions required to meet the turnaround principles will be implemented.</p>
<i>Technical Assistance Suggestions</i>	<p>Examples of evidence-based interventions for ELs and SWDs are needed.</p>

- c. Has the SEA indicated that it will ensure that each of its priority schools implements the selected intervention for at least three years?

2.D.iii.c PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 0 Yes, 7 No	
<i>Rationale</i>	Some of the interventions associated with being a priority School stop as soon as the school achieves “improvement plan” status, which may be in fewer than 3 years of being identified as priority.
<i>Strengths</i>	While it does not appear that the plan meets the technical requirements of the waiver, some peers feel that it is important to note that priority schools that improve enough to become Improvement Plan schools still receive support through the UIP.
<i>Weaknesses, issues, lack of clarity</i>	Once a priority School improves enough to become an Improvement Plan school, some of the supports and interventions change, meaning that schools may no longer be implementing interventions aligned with the turnaround principles. For example, a school may no longer have UIP improvement planning assistance and review and no longer have the requirement of diagnostic review.
<i>Technical Assistance Suggestions</i>	Use the UIP process to ensure that priority schools that achieve the “improvement plan” rating within one or two years of being identified as priority schools continue to implement turnaround interventions for a full three years.

- 2.D.iv** Is the SEA’s proposed timeline for ensuring that LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year reasonable and likely to result in implementation of the interventions in these schools?

- *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	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	Under the current system, priority schools are identified on a rolling basis such that whenever the school is identified, it is required to implement interventions the following school year. This means that the number of priority schools in a given year is fully a function of school performance, not CDE decisions to distribute priority schools' implementation of interventions.
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	

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	
<i>Tally of Peer Responses:</i> 0 Yes, 7 No	
<i>Rationale</i>	The proposal clearly identifies exit criteria. However, members of the panel feel that achieving "improvement plan" status for only one year is an insufficient indication of sustained improvement.
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	<p>Schools need only achieve "improvement school" rating for one year; therefore, sustained improvement may not have been achieved.</p> <p>Some peers are concerned that the exit criteria may not be sufficiently high given that the exit criteria is the 47th percentile, which may change annually.</p> <p>Some members of the panel are concerned that the exit criteria changes annually resulting in different criteria that may allow a school to exit even if performance and growth at the school declined or conversely, that the school made great improvements but will not be exited as a result of a higher cut point.</p>

2.D.v and 2.D.v.a PANEL RESPONSE*Tally of Peer Responses:**0 Yes, 7 No**Technical Assistance Suggestions*

Establish the requirement that schools that reach “improvement plan” status for two consecutive years may exit priority status.

2.E Focus Schools

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?

2.E.i PANEL RESPONSE*Tally of Peer Responses:**7 Yes, 0 No**Rationale*

The proposal describes the methodology used to identify focus schools.

Strengths

Schools with a “does not meet” rating for growth gaps are identified as focus schools.

*Weaknesses, issues, lack of clarity**Technical Assistance Suggestions*

2.E.ii Did the SEA include a list of its focus schools?

- a. Did the SEA identify a number of focus schools equal to at least 10 percent of the State’s Title I schools?
- b. In identifying focus schools, was the SEA’s methodology based on the achievement and lack of progress over a number of years of one or more subgroups of students identified under ESEA section 1111(b)(2)(C)(v)(II) in terms of proficiency on the statewide assessments that are part of the SEA’s differentiated recognition, accountability, and support system or, at the high school level, graduation rates for one or more subgroups?
- c. Did the SEA’s methodology result in the identification of focus schools that have —
 - (i) the largest within-school gaps between the highest-achieving subgroup or subgroups and the lowest-achieving subgroup or subgroups or, at the high school level, the largest within-school gaps in the graduation rate; or

(ii) a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate?

2.E.ii (INCLUDING QUESTIONS a-c) PANEL RESPONSE <i>Tally of Peer Responses:</i> 3 Yes, 4 No	
<i>Rationale</i>	The number of focus schools identified is not equal to at least 10% of the State’s Title I schools. Some peers feel that this is compensated for by the identification of schools that would be identified as focus schools as priority schools. Of the 50 Title I schools that would be identified as focus based on their growth gaps, 48 were already identified as priority schools.
<i>Strengths</i>	<p>Some peers feel that it is a strength that a large percentage of the schools that would have been identified as focus schools are already identified as priority schools, because priority schools receive more intense assistance and intervention.</p> <p>Some peers feel that identifying schools with low-performing subgroups, as CDE has, is a stronger way of identifying focus schools than identifying schools with the biggest achievement gaps, because schools with low performing subgroups are more likely to serve more low-income students, students of color, ELs and SWDs than big gap schools, and those students are likely to be lower performing.</p> <p>The State also identifies all schools with subgroup graduation rates of less than 65% as focus schools, which is important for identifying schools that are not successful in getting all students through graduation.</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>Some peers are concerned that identifying so many schools as focus and priority will dilute resources and capacity to support these schools.</p> <p>Some peers are concerned that designations and plans will be less meaningful with so many schools identified.</p> <p>Some peers are concerned that the shifting targets and normative nature of Priority School identification and exit criteria result in unclear expectations.</p>
<i>Technical Assistance Suggestions</i>	<p>Consider revising the percent of schools identified as Priority and Focus.</p> <p>Consider an absolute criteria that identifies a Priority School such that the targets do not shift annually and schools have a clear expectation of performance for Priority School status and exit.</p>

2.E.iii Did the SEA describe the process and timeline it will use to ensure that each LEA identifies the needs of its focus schools and their students and provide examples of and justifications for the interventions the SEA will require its focus schools to implement to improve the performance of students who are furthest behind?

- *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	
<i>Tally of Peer Responses:</i> 4 Yes, 3 No	
<i>Rationale</i>	There are meaningful interventions described for focus schools, but the proposal does not describe or provide examples of the interventions the SEA will expect of the LEA in relation to the LEA's focus schools, nor does it describe interventions that are tailored for different grade spans and different types of school needs.
<i>Strengths</i>	Focus schools that are identified as priority schools (which is the majority of them) will implement the priority School interventions aligned with the turnaround principles discussed above. For focus schools that are not priority schools, CDE will review and provide feedback on the UIPs, with a focus on interventions for groups that received a "does not meet" rating, and will be eligible for School Diagnostic Review Grants and School Improvement Support Partnership Grants.
<i>Weaknesses, issues, lack of clarity</i>	The proposal does not delineate or describe the roles and responsibilities of the LEA and SEA The proposal does not identify interventions that are appropriate for different levels (elementary, middle, etc) and different types of school needs.
<i>Technical Assistance Suggestions</i>	Examples of specific interventions the SEA will require LEAs to provide for Focus Schools are needed.

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 <i>Tally of Peer Responses:</i> 1 Yes, 6 No	
<i>Rationale</i>	The proposal clearly identifies exit criteria for focus schools. However, some members of the panel feel that achieving “meets” status on academic growth gaps/disaggregated graduation rates for only one year is an insufficient indication of sustained improvement.
<i>Strengths</i>	Some members of the panel feel that going from “does not meet” to “meets” on growth gaps is a big enough improvement to give confidence in sustainability.
<i>Weaknesses, issues, lack of clarity</i>	One year of achieving the exit target is not a signal of sustainability.
<i>Technical Assistance Suggestions</i>	Require that Focus Schools receive a “meets” or “exceeds” rating for growth gaps and disaggregated graduation rates for two years to exit focus status.

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

2.F 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? Are those incentives and supports likely to improve student achievement, close achievement gaps, and increase the quality of instruction for students?

2.F PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	The school and district performance frameworks create expectations for all schools and districts, and the UIP system provides differentiated support and earned autonomy for all schools.
<i>Strengths</i>	The differentiated accountability system gives more autonomy for local decision-making to schools and districts performing well. All schools must create a UIP that is posted on SchoolView. The transparent and comprehensive public reporting through SchoolView is likely to lead to greater public awareness and urgency about improvement for schools beyond only those that are struggling the most. Annotated improvement plans are available on line through SchoolView for districts and schools to use. A developed district accountability system is in place. Targeted District Improvement Grants and Tiered Instruction Grants provide resources and supports.
<i>Weaknesses, issues, lack of clarity</i>	UIP process is robust, but the proposal lacks detail about the interventions it will expect of districts and schools. As noted earlier, there is no assured annual resetting of AMO targets.
<i>Technical Assistance Suggestions</i>	

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?

- i. 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?*

2.G.i PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 4 Yes, 3 No	
<i>Rationale</i>	The UIP process with SEA managers holds promise to build local capacity.
<i>Strengths</i>	<p>UIP is a robust process for performance management focusing on continuous improvement.</p> <p>SEA assignment of managers and improvement managers to districts with priority schools is an example of tangible support and monitoring.</p> <p>SEA shares ownership of processes and accountability with districts by allocating the time of SEA managers to districts and schools based on the length of time that they are in need.</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>The proposal does not describe specific interventions that are expected to arise from the local UIP planning process, or a process for vetting and building the capacity of the lead partners required for turnaround and other providers who can help districts and schools meet their needs.</p> <p>Some members of the panel have concerns about the role and responsibilities of the managers and implementation managers and how their impact is monitored.</p>
<i>Technical Assistance Suggestions</i>	Based on information from the 12/7/11 call, consider increasing the number of managers and improvement managers to ensure impact.

- ii. 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.ii PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	The proposal includes a clearly articulated system of district accountability with improvement expectations and consequences if they’re not met.
<i>Strengths</i>	Districts are evaluated against the same indicators as high schools. Districts with turnaround status must undertake improvement activities such as employing a lead partner, having outside management for some schools, or closing schools. If, after 5 consecutive years, a district is still in turnaround status, the State Board may remove accreditation.
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	

- iii. Is the SEA’s process for ensuring sufficient support for implementation in priority schools, focus schools, and other Title I schools identified 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?

2.G.iii PANEL RESPONSE	
Tally of Peer Responses: 7 Yes, 0 No	
Rationale	Colorado is seeking to provide resources to support implementation of its accountability plan.
Strengths	<p>Grants through 1003(a) and 1003(g) are available to priority schools and districts and awarded on a competitive basis.</p> <p>The School and District Diagnostic Review Grant awards funds for facilitated data analysis, school support team and comprehensive appraisals for district improvement reviews, and support for action planning.</p> <p>School and District Improvement Support Partnership Grants provide funds for facilitated data analysis and implementation of instructional, leadership, and climate improvement work.</p> <p>Targeted District Improvement Grants support low-performing districts in improvement planning, implementation, and progress monitoring.</p>
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

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?

<p>PRINCIPLE 2 OVERALL REVIEW PANEL RESPONSE <i>Tally of Peer Responses: 4 Yes, 3 No</i></p>	
<p><i>Rationale</i></p>	<p>The proposed system is robust and applies multiple measures for evaluating school performance. However, there are elements of the system that raise concerns for some members of the panel. In addition, there are elements that may not be entirely consistent with the waiver requirements. Some members did not find the misalignment with waiver requirements to be detrimental to the proposed system. All members found strengths in the proposal and all found weaknesses.</p>

<p>PRINCIPLE 2 OVERALL REVIEW PANEL RESPONSE <i>Tally of Peer Responses:</i> <i>4 Yes, 3 No</i></p>	
<p><i>Strengths</i></p>	<p>School View is a strong public reporting system.</p> <p>Growth expectations for both proficient and non-proficient students.</p> <p>Some members of the panel feel that use of Adequate Growth Percentiles creates an expectation of growth to proficiency within three years or 10th grade, whichever is earlier.</p> <p>Measures of college and career readiness in high school performance frameworks.</p> <p>Some members of the panel feel that setting three performance thresholds – at the 15th, 50th, and 90th percentiles of proficiency—allows for meaningful differentiation among different types of schools. This differentiation creates conditions for effective performance management, with supports and intervention prioritized to those schools most in need, and earned autonomy and recognition for higher-performing schools.</p> <p>Some members of the panel believe that identifying more than 5% of Title I schools as priority schools reflects the State’s sense of urgency and conveys that sense to stakeholders.</p> <p>Clear consequences for sustained low performance among schools.</p> <p>A clear district accountability system, with expectations that are aligned to school expectations and clear consequences for sustained low performance.</p> <p>UIP is a data-based, problem-solving approach that prompts interventions aligned with the turnaround principles in the lowest performing schools with earned autonomy/recognition in the highest performing schools.</p>

<p>PRINCIPLE 2 OVERALL REVIEW PANEL RESPONSE <i>Tally of Peer Responses:</i> <i>4 Yes, 3 No</i></p>	
<p><i>Weaknesses, issues, lack of clarity</i></p>	<p>Some panel members are concerned that the modeling error is not accounted for in the growth calculations; particularly those related to the growth to standard component that assumes that a student’s future performance level can be estimated perfectly.</p> <p>Some members of the panel see the required MGP for earning a “meets” designation on overall growth and growth gaps as too low, especially given the heavy weighting of growth in the frameworks.</p> <p>The low weighting of status proficiency in the frameworks is a concern for some members of the panel, especially when the points accumulated in the overall achievement category are divided among four subjects and alternate assessment.</p> <p>The absence of status proficiency expectations for subgroups in the frameworks is a concern.</p> <p>Implications of using this primarily normative approach to measuring growth are not known</p> <p>There is no specified trigger for the State Board to adopt new, higher AMOs.</p> <p>Some peers feel that the lack of annual AMOs means that the proposal does not meet the requirements for the waiver.</p> <p>Some peers feel that over-identification of priority schools and under-identification of focus schools means that there is a likelihood that schools will be identified that are not performing significantly different than average.</p> <p>There are not well-defined district responsibilities on behalf of priority schools.</p> <p>Proposal lacks information on support for all teachers – not just ESL and Special Education teachers – to provide appropriate interventions based on the needs of ELs and SWDs educated in general education settings.</p> <p>Some panel members are concerned that students with significant disabilities who take the alternate assessment are only included in the status component of the accountability system.</p>
<p><i>Technical Assistance Suggestions</i></p>	<p>Please refer to specific technical assistance suggestions, detailed above.</p>

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 three options below?

If the SEA selected Option A:

If the SEA has not already developed any 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	
<i>Tally of Peer Responses:</i>	
<i>NA</i>	
<i>Rationale</i>	
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	
<input checked="" type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option B or Option C</i>	

- 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	
<i>Tally of Peer Responses:</i> NA	
<i>Rationale</i>	
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	
<input checked="" type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option B or Option C</i>	

Note to Peers: Staff will review iii.

If the SEA selected Option B:

If the SEA has already developed and adopted one or more, but not all, guidelines consistent with Principle 3:

Note to Peers: Staff will review i and iii.

- ii. 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.ii PANEL RESPONSE	
<i>Tally of Peer Responses:</i> NA	
<i>Rationale</i>	
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	
<input checked="" type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option A or Option C</i>	

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

3.A.i OPTION B.iv PANEL RESPONSE	
<i>Tally of Peer Responses:</i> NA	
<i>Rationale</i>	
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	
<input checked="" type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option A or Option C</i>	

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

3.A.i OPTION B.v PANEL RESPONSE	
<i>Tally of Peer Responses:</i> NA	
<i>Rationale</i>	
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	
<input checked="" type="checkbox"/> <i>Not Applicable because the SEA selected 3.A, Option A or Option C</i>	

If the SEA selected Option C:

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 C.i PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	Colorado State law and State Board-adopted guidelines form the basis of a comprehensive plan for educator evaluation that make the connection to improving instruction explicit.
<i>Strengths</i>	Colorado’s 2010 educator effectiveness bill includes, as a primary focus, the provision of meaningful feedback to educators about their practice to improve the quality of education. The proposal articulates expectations for teachers and principals at multiple levels of performance.
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option A or Option B</i>	

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 C.iii PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	The SEA ensured sufficient involvement of teachers and principals in the development and adoption of the statute and board guidelines, and in the design and implementation of the pilot.
<i>Strengths</i>	Stakeholders had multiple avenues to help shape requirements and processes such as public comment throughout the crafting and revision of SB 191 and substantial educator involvement in the design and piloting of the State’s model system. Published comments and use of stakeholders’ input in response to the draft rules between June and November 2011 is available on the CDE’s website.
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option A or Option B</i>	

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

3.A.ii For any teacher and principal evaluation and support systems for which the SEA has developed and adopted guidelines, consistent with Principle 3, are they systems that:

a. Will be used for continual improvement of instruction?

➤ *Are the SEA’s guidelines likely to result in support for teachers that will enable them to improve their instructional practice?*

3.A.ii.a PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	Colorado State statute and the recently adopted Board guidelines strongly reinforce the link between the evaluation system and improvements in teacher and leader instructional practice.
<i>Strengths</i>	State statute and Board rules lay out expectations for the State and districts about the focus on improving instruction. Standard II in the principal assessment articulates how principals are to lead and support instructional improvements in their buildings.
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i>	

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	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	The educator evaluation system model proposed incorporates more than three levels of performance for principals and teachers.
<i>Strengths</i>	The four performance levels for educators are ineffective, partially effective, effective and highly effective. There are five levels of performance for principals on professional practices with respect to State performance standards: not evident, particularly effective, proficient, accomplished, and exemplary.
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i>	

- 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 and 3.A.ii.c(i) PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	The guidelines require LEAs to validate their measures during the pilot phase and full scale up. Both teacher and principal systems require use of multiple measures. A significant portion of the evaluation is to be based on measures of student academic growth. Guidelines describe criteria for accepting district-selected measures and call for the SEA to monitor local implementation.
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	Articulate the process for an LEA to implement an evaluation system for at least one year before it has consequences for at least one year.
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i>	

- (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	
<i>Tally of Peer Responses:</i> 6 Yes, 1 No	
<i>Rationale</i>	Colorado's guidelines include criteria on the specifications of a student growth plan for use in educator evaluation.
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	The State's waiver plan asserts that a student growth model will be adopted no later than July 2013, but does not yet define the type of model to be used.
<i>Technical Assistance Suggestions</i>	More information on Colorado's specific approach to measuring student growth in tested subjects will be useful to further strengthen their overall plan.
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i>	

- (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	
<i>Tally of Peer Responses:</i> 6 Yes, 1 No	
<i>Rationale</i>	The guidelines specify the types of measures of student growth for non-tested grades and subjects, and the criteria for their use.
<i>Strengths</i>	The SEA will be developing a model and technical guidance for districts based on the results of further research and the experience of pilot districts.
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	The SEA needs to update the guidelines before the end of SY 2011-2012.
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i>	

d. Evaluate teachers and principals on a regular basis?

3.A.ii.d PANEL RESPONSE	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	The guidelines require regular evaluation of teachers and principals.
<i>Strengths</i>	State Board adopted guidelines state that “At a minimum, teachers and principals must be evaluated annually. Furthermore, novice or partially proficient teachers should be observed at least twice annually (pg 124, ESEA Flexibility Request).”
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i>	

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	
<i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	The guidelines require feedback and the identification of needs.
<i>Strengths</i>	All teacher evaluation reports must contain a written improvement plan (3.03 D State Board rules). The Principal Professional Performance Plan will outline annual goals for improvement (5.01 State Board rules).
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i>	

f. Will be used to inform personnel decisions?

3.A.ii.f PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	The statute establishes that evaluation results will be used for a range of personnel decisions for teachers. The guidelines do not address how evaluation will be used for personnel decisions related to principals.
<i>Strengths</i>	The Board-adopted guidelines outline how evaluation decisions are to play a role in tenure decisions, including the loss of tenure.
<i>Weaknesses, issues, lack of clarity</i>	Plans to develop guidelines for Personnel decisions beyond tenure have not yet been articulated.
<i>Technical Assistance Suggestions</i>	
<input type="checkbox"/> <i>Not applicable because the SEA selected 3.A, Option C</i>	

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?*
- *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 <i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	The strategy is well conceptualized and coherent and builds from strong statutory language and detailed guidelines. The peers acknowledge the capacity and implementation challenges associated with ensuring rigorous and high quality implementation of locally-designed educator evaluation systems.
<i>Strengths</i>	<p>CDE is playing a monitoring role in the implementation of the evaluation systems, recognizing the need for LEA flexibility in a State that values local control.</p> <p>The proposed educator evaluation system model incorporates more than three levels of performance for principals and teachers</p> <p>The rules promulgation process clarifies the degree of LEA flexibility, and Colorado is in the process of creating a model system that reflects input from educators, is validated, and is designed to be continuously improved (pg 126-7, ESEA Flexibility Request).</p> <p>The CDE has outlined clear criteria against which LEA implementation will be monitored.</p> <p>The State is on track to develop options for valid, reliable measures of student growth in the tested and non-tested grades and subjects for LEAs to adopt and implement locally. Development is occurring primarily in the content collaborative and the evaluation pilot process (pg 127-128, ESEA Flexibility Request).</p>
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	

Principle 3 Overall Review

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?

PRINCIPLE 3 OVERALL REVIEW PANEL RESPONSE <i>Tally of Peer Responses:</i> 7 Yes, 0 No	
<i>Rationale</i>	The SEA’s plan for development and implementation of educator evaluation and support systems is comprehensive and coherent. If implemented with fidelity, it holds promise for increasing the effectiveness of teaching and learning.
<i>Strengths</i>	State statute and Board rules lay out expectations for the State and districts about the focus on improving instruction. The State is on track to develop options for valid, reliable measures of student growth in the tested and non-tested grades and subjects for LEAs to adopt and implement locally. Development is occurring primarily in the content collaborative and the evaluation pilot process (pg 127-128, ESEA Flexibility Request). The Board-adopted guidelines outline how evaluation decisions are to play a role in tenure decisions, including the loss of tenure.
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	

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	
Rationale	The plan was thoughtfully developed and is supported by strong statutory language. However with regard to Principle 1 greater specificity is needed to give the panel more confidence in its effective implementation: professional development for all content teachers to ensure that they are prepared to teach diverse student populations, including ELs and SWDs, to enable equitable access to the content of the new standards; as well, professional development for educators that ensures that they know, understand and can teach the new standards. With regard to Principle 2, some panel members express concern that the fundamental growth determinations that underpin the accountability system lack rigor and may not incentivize improvements in student achievement in college and career-ready standards. With regard to Principle 3, the panel members agree the State has a strong foundation and will continue to learn from implementation.

OVERALL REQUEST EVALUATION PANEL RESPONSE	
<i>Strengths</i>	<p>Principle 1 :</p> <p>The plan detailed on p. 26 provides a clear picture of responsibilities for CDE, districts and teachers in each of the years leading up to full implementation of Common Core State Standards.</p> <p>The requirement that all preparation programs align their courses to Common Core State Standards by December 2012 will support a smooth transition, as will efforts to align preparation, induction and licensure to the new standards.</p> <p>Principle 2:</p> <p>School View is a strong public reporting system.</p> <p>Measures of college and career readiness in high school performance frameworks are included.</p> <p>Some members of the panel feel that setting three performance thresholds – at the 15th, 50th, and 90th percentiles of proficiency—allows for meaningful differentiation among different types of schools. This differentiation creates conditions for effective performance management, with supports and intervention prioritized to those schools most in need, and earned autonomy and recognition for higher-performing schools.</p> <p>Clear consequences for sustained low performance among schools are included.</p> <p>The Plan presents a district accountability system, with expectations that are aligned to school expectations and clear consequences for sustained low performance.</p> <p>UIP is a data-driven, problem-solving approach that prompts interventions aligned with the turnaround principles in the lowest performing schools with earned autonomy/recognition in the highest performing schools.</p> <p>Principle 3:</p> <p>The SEA’s plan for development and implementation of educator evaluation and support systems is comprehensive and coherent. If implemented with fidelity, it holds promise for increasing the effectiveness of teaching and learning.</p>

OVERALL REQUEST EVALUATION PANEL RESPONSE	
<p><i>Weaknesses, issues, lack of clarity</i></p>	<p>Principle 1: The professional development and training is not described in detail, nor is there a description of its delivery, length, depth, breadth, or requirements for participants to demonstrate their knowledge and understanding, or their ability to apply their knowledge; strong professional development is essential for effective implementation at the local level.</p> <p>There is a lack of an integrated professional development approach to ensure that all content teachers are well equipped to teach content as well as use differentiated instructional strategies to assure ELs and SWDs have equitable access to common core standards.</p> <p>Principle 2: The absence of status proficiency expectations for subgroups in the frameworks is a concern.</p> <p>The low weighting of status proficiency in the frameworks is a concern for some members of the panel, especially when the points accumulated in the overall achievement category are divided among four subjects and alternate assessment.</p> <p>Implications of using this primarily normative approach to measuring growth are not known.</p> <p>There is no specified trigger for the State Board to adopt new, higher AMOs.</p> <p>Some peers feel that over-identification of priority schools and under-identification of focus schools means that there is a likelihood that schools will be identified that are not performing significantly different than average.</p> <p>There are not well-defined district responsibilities on behalf of priority schools.</p>
<p><i>Technical Assistance Suggestions</i></p>	<p>No text</p>