

ESEA Flexibility

Peer Panel Notes



State Request: District of Columbia

Date: 03/27/2012

REVIEW AND EVALUATION OF REQUESTS

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

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

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

Review Guidance

Consultation

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

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

Consultation Question 1 Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • The District of Columbia’s (DC) Office of the State Superintendent of Education (OSSE) made extensive efforts to gather stakeholder feedback. The request references specific feedback (from the draft request that was incorporated into the final request), focused particularly on holding schools accountable for the education of all students and not ignoring certain populations; however, the incorporation of this feedback was not completely clear to the Peer Reviewers.
<i>Strengths</i>	<ul style="list-style-type: none"> • Teachers and their representatives participated in open forums, extended office hours, and online opportunities to work with OSSE on the request. Representatives of various groups including teacher and principal associations met with OSSE. Teachers also participated in several focus groups (pp. 16-17). OSSE documented a number of teachers’ concerns and comments, including cautions against holding schools and staff accountable without providing equitable support. Charter school boards and administrators were also included in conversations (p. 18). Efforts to collect feedback included dozens of community meetings throughout DC’s 8 wards. More than 600 individuals participated in more than 55 public events, and OSSE solicited public input via a variety of media, giving stakeholders multiple ways to provide input: electronically, by mail, or in person at community forums and State Board meetings (p. 16).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> The specific ways in which OSSE incorporated teacher and leader input is unclear. With respect to meetings that were held, more detail is needed about the specifics (number, type, when they were held and whether they were informational meetings or opportunities to provide input on the request).
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> OSSE should document the specific details of the feedback meetings and provide clarity about whether/how feedback was incorporated.

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

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

Consultation Question 2 Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> OSSE created small focus groups and invited existing advisory groups such as advocates or representatives for Wards, homeless families, charter schools, delinquent students, teachers, local educational agency (LEA) administrators, institutions of higher education, youth leadership, faith-based organizations, private schools, English Learners and others to share their perspectives (pg. 19). Specific feedback was solicited via open-ended questions (p. 20).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • Efforts were made to eliminate geographical, economic, or temporal barriers, using flyers and emails to advise neighborhoods about public forums and holding focus groups and forums in a variety of settings, including Parent-Teacher Association (PTA) and neighborhood association meetings. Social media was mobilized, including Facebook and Twitter (p. 19). Stakeholder access was provided by phone, written/electronic mail, webinar, teleconference, and through in-person meetings. An open comment period on the draft was provided during a month-long period (January 18-February 14) (p. 20). OSSE has documented the feedback by principle and summarized it (pp. 20-24).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The specific ways in which OSSE incorporated other community input is unclear. With respect to meetings that were held, more detail is needed about the specifics (number, type, when they were held and whether they were informational meetings or opportunities to provide input on the request).
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should document the specific details of the feedback meetings and provide clarity about whether/how feedback was incorporated.

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

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

1.B Panel Response, Part A

Tally of Peer Responses: 5 Yes, 1 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> OSSE has a strong foundation for, and has done a great deal to prepare for the transition to, college- and career-ready standards. OSSE is an active member of the Partnership for Assessment of Readiness for College and Careers (PARCC) assessment consortium and other collaborations that can support this work. However, concerns were noted about the need for greater coherence and specificity about the implementation plan in the request. OSSE has adopted the Common Core State Standards (CCSS) (p. 28). After adoption, OSSE collaborated with all LEAs on an aggressive implementation timeline beginning in 2011 (pp. 29-30). OSSE joined PARCC as a governing state and will implement that assessment in 2014-2015 (p. 30). It has provided a timeline for implementation by grade (p. 30). Outreach for the implementation was done by ensuring parents and teachers had an understanding of the move to CCSS (p. 31). OSSE has partnered with a number of organizations and institutions to support implementation including the University of DC, the American Diploma Project, the Council of Chief State School Officers (CCSSO), and the National Center and State Collaborative (NCSC) (p. 31). CCSS standards have been sent out in print form to each school site for distribution (p. 32). Using Race to the Top (RTTT) funds, OSSE created a Common Core Task Force with representatives from 20 of 30 LEAs to focus on implementation of CCSS (p. 32). OSSE will offer an instructional and curriculum summit in summer 2012 to provide support for teachers in understanding the essentials of CCSS (p. 32).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • OSSE carried out the adoption process beginning in 2009 by creating a comprehensive crosswalk with DC’s existing content standards and bringing in 50 stakeholders to review the crosswalk and collect feedback. Stakeholders included instructional coaches, educators, school leaders, higher education faculty, parents, members of the business community, and elected officials (p. 29). Because of the aggressive timeline, OSSE has already begun using CCSS for all students in English/language arts (ELA) and mathematics in grades K-2 (p. 30). Even though the OSSE is not responsible for curriculum development and each LEA develops its own curriculum, OSSE is providing professional development and exemplar lessons (p. 31). OSSE has posted the crosswalk of the DC standards to the CCSS for teachers to use in instructional planning, including the option for using the on-line tool developed by Achieve, Inc. (p. 31). • OSSE has begun to engage in parent and community outreach efforts, such as sending home English and Spanish PTA guides introducing the CCSS by ELA and mathematics at various grade levels (p. 32). OSSE sends out monthly newsletters and Twitter updates (p. 32). • Additionally, OSSE is planning a research project with the University of DC to evaluate the impact of CCSS on K-12 instruction (p. 32).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Some peers noted that OSSE appears to be committed to prescriptive professional development, which may restrict professional autonomy. The examples given on page 40 seem to focus more on specific techniques than on increasing teacher knowledge of standards. Suggesting specific techniques separate from an evaluation may be premature. There is also no mention of Career and Technical Education (CTE) possibilities. • Some peers had concerns about whether the transition plan is realistic and of high quality. A seeming lack of coherence or specificity was noted in that the request describes a number of past actions and future intentions (<i>i.e.</i>, Attachment 12—the milestones chart) but not a coherent picture.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should create a coherent, comprehensive and high-quality plan with explicit links between activities to transition to college- and career-ready standards. The elements of a high-quality plan are outlined on page 4 of the ESEA Flexibility Request.

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

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

1.B Panel Response, Part B

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • While OSSE has addressed some assessment-related elements of this work (participation in different consortia, developing resources for teachers of special education students, etc.), the concerns raised above about the need for a coherent and high-quality plan take on an even greater urgency when considering the need for English Learners, students with disabilities, and low-achieving students to gain access to and learn content aligned with the college- and career-ready standards.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • OSSE has signed a Memorandum of Understanding (MOU) with the World-Class Instructional Design and Assessment (WIDA) to align standards and assessments with CCSS (p. 33). OSSE is also a member of the Assessment Services Supporting ELLs through Technology System (ASSETS) consortium, which will work with WIDA to provide comprehensive assessment tools for helping English Learners become college and career ready (p. 33). OSSE is providing professional development to meet English as a Second Language (ESL) licensure and certification requirements (p. 35). • For the students with the most significant cognitive disabilities taking the DC Comprehensive Assessment System (CAS) Alternate test, helping teachers differentiate instruction using CCSS is a priority; entry points are being aligned with CCSS and used to guide the evidence-based portfolio assessment used for these students (pp. 33-34). Working with the NCSC, OSSE is developing performance-level descriptors and other tools for mathematics to ensure that students with the most significant cognitive disabilities achieve higher academic outcomes (p. 34). A Community of Practice comprised of 20 individuals including general and special educators and technical assistance providers is working to ensure that NCSC modules are practical and feasible. • For teachers of students with disabilities, OSSE is providing comprehensive professional development to ensure that CCSS are accessible to all students (p. 34). OSSE’s statewide special education data system (SEDS) will be aligned with CCSS and Learning Programs and will include a drop-down menu of CCSS to assist in writing Individualized Education Programs (IEPs) (p. 34). OSSE has arranged for the provision of free Special Education Praxis preparation materials to assist teachers who want to earn certification (p. 35).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • While there is an evident intention on OSSE’s part to include students with disabilities and English Learners, there does not appear to be a high-quality plan for how those students will gain instructional access to college- and career-ready standards. OSSE details some of its plans for assessments, yet is not as clear about its expectations and plans for those working with these students after data from the assessments are available. • The request does not elaborate on awareness and capacity building for teachers, parents, and other stakeholders around the need for college- and career-ready standards for all students. This would include information and materials on the impact of this transition to these standards, with details about related assessments and activities that highlight the impact of this transition on students in all subgroups. • Peers raised a concern regarding the focus in this section of the request on the one percent of students with the most significant cognitive disabilities who take an alternate assessment based on alternate academic achievement standards (which is only a subset of students with disabilities) yet a lack of corresponding information regarding supports for other students with disabilities.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should provide a detailed plan for assisting LEAs in providing professional development to teachers on alignment of curriculum to college and career ready standards for English learners, students with disabilities, and low-achieving students.

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

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

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

If the SEA selected Option B:

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

1.C, Option B Panel Response

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

Tally of Peer Responses: NA

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

Principle 1 Overall Review

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

Principle 1 Overall Review Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • Thanks to their participation in Race to the Top and an aggressive timeline, OSSE has shown important progress in preparing the LEAs for the transition to CCSS. • OSSE provides some evidence of planning for the transition to and implementation of college-and career-ready standards, and the development and administration of annual, statewide, aligned high-quality assessments that measure student growth. However, as noted below, OSSE needs to do more to provide a coherent, comprehensive and high-quality plan to transition to college- and career-ready standards.
<i>Strengths</i>	<ul style="list-style-type: none"> • OSSE has documented an array of opportunities for stakeholders to provide input into the adoption of college- and career-ready standards and to learn about CCSS and provide feedback. In addition, training sessions and opportunities for input from teachers and administrators have been provided, including those working with English Learners and students with disabilities.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • OSSE does not provide a coherent, comprehensive and high-quality plan with explicit links between activities to transition to college- and career-ready standards. • The request does not elaborate on awareness and capacity building for teachers, parents, and other stakeholders around the need for college- and career-ready standards for all students. This would include information and materials on model, related assessments and activities and the impact of this transition on students in all subgroups. • More information on the specifics of professional development opportunities is needed, detailing OSSE’s plans to work with LEAs to develop, target implementation, and build local capacity for provision of these types of resources.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should utilize the high-quality elements (such as providing training for educators working with English Learners) of its approach to implementing the CCSS as the basis for developing a comprehensive plan that comprehensively and cohesively addresses the needs of special populations for accessing college- and career-ready standards. This would be part of a coherent, comprehensive and high-quality plan with explicit links between activities to transition to college- and career-ready standards. • OSSE should elaborate on awareness and capacity building for teachers, parents, and other stakeholders around the need for college- and career-ready standards for all students. This would include information and materials on the impact of this transition to these standards, with details about related assessments and activities that highlight the impact of this transition on students in all subgroups.

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

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

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

2.A.i Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • OSSE states that it is committed to providing schools with autonomy in exchange for accountability for student achievement results for all students and for every subgroup (pg. 45). It has set ambitious goals for improvement in reading and mathematics proficiency as well as in graduation rates (p. 46), but the request does not provide a clear methodology for the proposed accountability indexing process, nor how it reflects the different ways in which annual measurable objectives (AMOs) are discussed in the narrative and addendum. • The request indicates that OSSE’s RTTT grant has provided the resources to create an enhanced support system for the bottom 20 percent of its Title I schools (p. 47), but does not indicate how this will be accomplished and makes no connection to this in other parts of the flexibility request. • No information on the use of graduation rates and school performance and progress over time was provided.
<i>Strengths</i>	<ul style="list-style-type: none"> • OSSE appears to be proposing to use a value table approach to calculating growth in student achievement (see the table on pp. 51-53). • OSSE shows an interest in subgroup analysis (samples on pp. 51-52). • The request describes a number of actions that OSSE will take to change how student achievement is reported.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • It is not clear how the existing required ESEA subgroups will be used in the new accountability system. • Use of the value table (shown on p. 51) in the school accountability system is not clearly described. • OSSE has not laid out a step-by-step process for how the assessments are utilized, how the scores that are generated from those assessments are factored in, how the results for subgroups are incorporated into the overall school score, and how that score translates into progress toward AMOs. The lack of such a process explanation makes the identification of different categories of schools appear arbitrary. • Although targets around graduation AMOs are cited, there is no clear relationship to the process by which schools with low graduation rates are identified, intervened in, and supported. • On the call with peer reviewers, OSSE clarified that participation rate is accounted for in the system, however, it remains unclear how these rates as well as the scores of students taking alternate assessments are included in the accountability system. • It is unclear whether there is a mechanism for documenting that the incentives and recognition noted will be effective in closing achievement gaps. • The system, as designed, may actually reduce precision in assessing subgroup performance and accountability for subgroup progress toward AMOs. • It is unclear how OSSE is accounting for subgroups, per the description on page 53. Peers have concern that OSSE is counting the “all students” subgroup twice.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should clarify how it plans to use the existing ESEA subgroups in its new accountability system to address each of the weaknesses identified above. • OSSE needs to provide greater clarity and business rules for its entire accountability system.

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

2.A.i.a Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
Rationale	<ul style="list-style-type: none"> OSSE plans to test students in reading and mathematics and count students in a weighted system so that schools earn more “credit” for the growth of lower-performing students and for moving students into a higher performance level (see chart on p. 51). Subgroups such as English Learners will be aggregated into the whole group and disaggregated into subgroups in order to determine subgroup growth (see chart on p. 52). OSSE plans to collaborate with the District of Columbia Public Schools (DCPS), the Public Charter School Board (PCSB), charter LEAs, schools, external partners, education advocacy groups, community-based organizations, and parent groups to develop a network of tiered recognition, accountability and support (p. 54). OSSE believes that this statewide network will have the greatest impact on improving achievement and graduation rates as well as closing achievement gaps, particularly for the lowest-performing subgroups and special populations (p. 55). Without greater clarity about the process by which identification in this accountability system is accomplished by OSSE (how scores that are generated from assessments are factored in, how the results for subgroups are incorporated into the overall school score, and how that score translates into progress toward AMOs, etc.), however, it is not possible to determine if the system provides differentiated recognition, accountability and support for all LEAs. Furthermore, OSSE’s legal and regulatory relationship with all LEAs is unclear, thus creating uncertainty around its ability to ensure interventions as needed.
Strengths	<ul style="list-style-type: none"> The samples of the analysis on pages 51-52 show an interest in the subgroup level of analysis. OSSE plans to increase the number of schools held accountable for the students with disabilities subgroup by lowering the minimum “n size” from 25 to 10 for all subgroups, which will more than double the number of schools held accountable for this subgroup. OSSE notes that this will not impact privacy since it is already publicly reporting scores for groups of 10 or more students (p. 53).

<i>Response Component</i>	<i>Peer Panel Response</i>
Weaknesses, issues, lack of clarity	<ul style="list-style-type: none"> • It is not clear why “assessments outside reading and math will be combined [into an overall average] at half the rate of the main assessments.” Peers wondered if this is because they are valued differently or due to concerns around validity (p. 53). • OSSE indicates on page 53 that it will consider reducing its subgroup size from 25 to 10. This is not a commitment to do so, however. • OSSE should provide information about how its “n-size” change will impact school identification (new tables, etc) and clarify timelines for adding these to the calculation rules. • How the value table (shown on p. 51) will be used in the school accountability system is not described. • It is not clear that the existing required ESEA subgroups will be used in the new accountability system; the system does not appear to include subgroups, nor demonstrate progress of subgroups over time. OSSE should clarify how subgroup populations will be included in its proposed accountability system. • Although OSSE clarified on the call with peers that participation rate is accounted for in the accountability system, the way in which it is included, in addition to the way in which OSSE will include the scores of students with the most significant cognitive disabilities taking alternate assessments is still not clear to peers. • OSSE has not laid out a step-by-step process for how the assessments are utilized, how the scores that are generated from those assessments are factored in, how the results for subgroups are incorporated into the overall school score, and how that score translates into progress toward AMOs. The lack of such a process explanation makes the identification of different categories of schools appear arbitrary. • Although targets around graduation AMOs are cited, there is no clear relationship to the process by which schools with low graduation rates are identified, intervened in, and supported.

<i>Response Component</i>	<i>Peer Panel Response</i>
Technical Assistance Suggestions	<ul style="list-style-type: none"> • OSSE should provide further clarification for use of the value table (p. 51) within the accountability system. Without an explicit explanation of OSSE’s process (<i>i.e.</i>, its business rules), it is unclear how the proposed value-table approach to student accountability will be used in accountability for schools. • OSSE should provide clarification on how existing required ESEA subgroups will be used in the new accountability system. • OSSE should provide business rules that determine which schools are identified (which should include graduation rates and subgroups). OSSE should be able to describe how it has reached the cut points, per the table on page 69.

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

2.A.i.b Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • The incentive to close achievement gaps is that schools will achieve a higher score by moving students from lower performance levels to higher levels. Thus, schools have a reason to focus on students at the lower end of achievement. In addition, changing the minimum “n-size” requirement to 10 from the current 25 will enable twice as many schools to be held accountable for subgroup performance, which will likely result in increased attention to those subgroups. • Without an explicit explanation of OSSE’s process (<i>i.e.</i>, its business rules), it is unclear how the proposed value-table approach to student accountability will be used in accountability for schools. Thus, it is not possible to ascertain how gaps in student achievement will be effectively closed.
<i>Strengths</i>	<ul style="list-style-type: none"> • The request describes a number of actions that OSSE will take to change how student achievement is reported.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Clarity on the value-table approach to accountability for schools is needed. • Other than using authority over funding, it is unclear whether OSSE is prepared to exercise authority over charter schools in implementing this system. • It is unclear whether there is a mechanism for documenting that the incentives and recognition noted will be effective in closing achievement gaps. • The system, as designed, may actually reduce precision in assessing subgroup performance and accountability for subgroup progress toward AMOs. For example, OSSE is counting the “all students” subgroup twice. • No discussion of how participation rate factors into OSSE’s accountability system is included in the request documents, although it was discussed on the call with OSSE. Peers still felt more explanation was needed. • Students with the most significant cognitive disabilities taking alternate assessments based on alternate academic achievement standards are not included.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should describe in sufficiently greater detail how school accountability will be determined, as well as what actions will be taken to reduce gaps in achievement for subgroups. • OSSE should provide clarification on the point at which data for subgroups is aggregated into the overall system. • OSSE might want to consider empanelling a Technical Advisory Committee, or consulting with experts in the field, to refine its approach to its accountability system.

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

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

ONLY FOR SEAs SELECTING OPTION B: If the SEA elects to include student achievement on assessments other than

reading/language arts and mathematics in its differentiated recognition, accountability, and support system by selecting Option B, review and respond to peer review questions in section 2.A.ii. If the SEA does not include other assessments, go to section 2.A.iii.

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

- a. Note to Peers: Staff will review 2.A.ii.a
- b. Does the SEA’s weighting of the included assessments result in holding schools accountable for ensuring all students achieve the State’s college- and career-ready standards?
- c. Note to Peers: Staff will review 2.A.ii.c

2.A.ii.b PANEL RESPONSE

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

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • OSSE will include composition and science assessments in its new accountability system in the future (p. 58), one in 2013 and the other in 2014. It argues that creating quality assessments and changing instruction and curriculum is a lengthy process so OSSE is adding only two new assessments (p. 58). However, there is a lack of clarity about the place of these assessments within the broader accountability system, and how this will impact school identification.
<i>Strengths</i>	<ul style="list-style-type: none"> • The composition and science assessments will be aligned with CCSS (p. 58). OSSE reports that additional assessments will be evaluated for adoption including alternative methods such as portfolio and performance-based assessments (p. 58).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • OSSE makes an argument that stakeholders are concerned about the narrowing of the curriculum to just reading/ELA and mathematics. However, it is including only two additional subjects in its new accountability system. Some peers noted a concern about the message this sends regarding all other subjects, such as social studies, foreign language, computer science, etc. • The additional assessments are not part of the current system.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> OSSE should clarify its timeline, methodology and the impact of including new assessments in the overall accountability system.

2.B Set Ambitious but Achievable Annual Measurable Objectives

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

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

If the SEA selected Option C:

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

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

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

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

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> OSSE will have two AMOs. One will be proficiency based on school-level goals that include a growth component, and one will be focused on graduation rates (p. 62). The graduation rate AMO will use an adjusted cohort graduation rate. The focus is on measureable improvement and the target is 70 percent of students graduating in 4 years by 2017, and 90% of students graduating in 6 years by 2017 (p. 63). For the proficiency AMO, OSSE plans to reduce the number of students who are not proficient by half over a 6-year period, with annual targets set for each school by OSEE (see the chart on p. 63). However, the statewide goals document (DC State Overall Targets) does not align with the information provided in the request narrative.
<i>Strengths</i>	<ul style="list-style-type: none"> OSSE plans to explore the addition of AMOs in other subjects as statewide assessments become available (p. 63).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> It is unclear whether the proficiency AMOs include mathematics and reading/ELA separately. This is not specified in the narrative in the request (p. 62). However, per the addendum provided by OSSE, AMOs separated by reading and mathematics were provided. This information, then, does not align with the description of the system in the request. Based on the proposal submitted, peers are not clear on how AMOs are calculated and how they will be included in the system.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> OSSE should provide clarification of how OSSE plans to set AMOs, use them in the accountability system, and incorporate its proposed graduation rate AMOs within the broader system.

2.C Reward Schools

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

2.C.i PANEL RESPONSE

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> The business rules/methodology for determining the cut score for reward schools in the table on page 69 are not provided. The addendum that OSSE provided (with its list of reward schools) does not match the list included in the original request, nor is there a clarification of why changes in the number schools identified occurred.
<i>Strengths</i>	<ul style="list-style-type: none"> None provided.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> OSSE provides a table on page 69 of its identification criteria for reward schools but does not provide or describe any methodology for the cut scores, therefore making them appear arbitrary. OSSE provides no justification for its decisions regarding the cut scores in this table. It is unclear whether the achievement of the “all students” subgroup and other subgroups, and associated gaps, match the schools that are classified as reward schools. Table 2 in Attachment 9 and the addendum provided by OSSE have different information, without clarification.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> OSSE should provide the business rules for determining the cut scores that are included in the table on page 69.

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

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

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

2.C.iii PANEL RESPONSE

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> OSSE will identify schools eligible to receive the Superintendent’s Award in the categories of proficiency and progress, and a school may be categorized in both if it meets the criteria. Schools may receive a letter of recognition, a school visit by an official, a certificate presented at a State Board of Education meeting, a press release, eligibility for nomination as a National Title I Distinguished School, eligibility for substantially reduced SEA monitoring, and eligibility to apply for financial rewards (pp. 70-71). The application process (for eligible schools only) requires the Award candidates to identify practices that contributed to progress or proficiency and to propose ways of using funds that ensure the continuation or expansion of those practices and/or address other practices to build on previous success (p. 71). DCPS will grant the most autonomy to reward schools while the PCSB offers a number of ways to recognize high-performing schools such as high-profile opportunities (White House visits), financial awards, public recognition and access to facilities (p. 73).
<i>Strengths</i>	<ul style="list-style-type: none"> Eligibility for financial awards is reserved for high-poverty schools (poverty rate of at least 35 percent), schools receiving Title I allocations, and schools without a selective admission process.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> There is minimal evidence that stakeholders were consulted, which could bring into question whether these rewards are seen as meaningful. The PCSB award of “access to facilities” is apparently based on a survey of charter sector needs. OSSE should clarify what “access to facilities” means (p. 73).
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> OSSE should further document stakeholder input and feedback in the development and use of the rewards system.

2.D Priority Schools

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

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

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

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • OSSE’s “interventions” list is the list of “turnaround principles” (p. 75). • DCPS’ list of interventions is varied and includes reviewing and evaluating the intervention plan already in place under the current accountability system; implementing a turnaround action plan with an alternative governance structure such as charter school, outside provider, hybrid structure, etc; or closing the school; and professional development around best practices in school turnaround (p. 79). • The PCSB has a four-step process of 1) assessing a school’s situation, and then 2) either revoking the school’s charter or providing intensive support, 3) progress monitoring, and 4) reassessing.
<i>Strengths</i>	<ul style="list-style-type: none"> • LEAs may select from one of the four SIG models, which by definition align with the turnaround principles.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • More detail about interventions would be helpful. • OSSE has left much of the decision-making regarding the choice of interventions to the LEA level. There appears to be limited coordination between OSSE and the LEAs. • OSSE references a tiered network of support without providing adequate detail.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should provide details regarding its process for monitoring interventions or demonstrate its system’s potential to be effective. • OSSE should provide greater detail about strategies for “ongoing mechanisms for family and community engagement” and strategies, tools, and processes that would enable schools to use “data to inform instruction and for continuous improvement.”

- b. Are the identified interventions to be implemented in priority schools likely to —
- (i) increase the quality of instruction in priority schools;
 - (ii) improve the effectiveness of the leadership and the teaching in these schools; and
 - (iii) improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students?

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

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • OSSE has not proposed specific interventions aside from SIG models. DCPS and PCSB proposals involve closing down a school or reconstituting it at one extreme and providing monitoring at the other.
<i>Strengths</i>	<ul style="list-style-type: none"> • None provided.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • OSSE has not shown the connection between proposed interventions and the needs of specific subgroups or how the interventions would be differentiated by school and subgroup needs.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should provide research-based interventions aligned with the turnaround principles, rather than simply listing the principles.

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

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

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

2.D.iv Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> Based on the ongoing implementation of interventions at the 14 SIG schools, and the timeline provided for additional interventions (p. 82), it appears OSSE is prepared to meet this requirement.
<i>Strengths</i>	<ul style="list-style-type: none"> OSSE has clearly identified a significant consequence for remaining in priority school status.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Specificity regarding the interventions and how those interventions are “meaningful” for addressing school and subgroup needs is needed.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> None provided.

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

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

2.D.v and 2.D.v.a Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • OSSE will use student achievement results (targets to be set in a school’s improvement plan), yearly progress on leading indicators (from final SIG requirements) compared to baseline, and school-level progress of intervention implementation (p. 84). However, the terms (and methodology) are not clearly defined, nor is the relationship to the accountability system evident – thus creating the impression that this is a separate way to assess progress or performance. • If a school is progressing adequately at each of the originally planned three years of implementation, it will exit at the end of the 3-year period. Otherwise, an additional year will be added and the school will be required to adjust its plan (p. 84).
<i>Strengths</i>	<ul style="list-style-type: none"> • If progress is not being made during the course of the 3-year implementation, a school will be required to adjust its plan and an additional year will be added (p. 84).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • OSSE does not clearly define the new accountability metrics and, as such, peers could not identify whether the exit criteria align with the metrics and if the criteria would ensure that schools have made significant progress. There is a lack of clarity regarding how schools are improving school achievement prior to exiting priority school status. • OSSE does not clearly explain the exit process and associated multiple criteria, including the three-point scale and apparent multiple methods for exiting priority status – nor does OSSE provide a clear connection between its exit criteria and the methods for initial identification.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should provide the methodology for determining eligibility for exiting priority status and provide clarity on how these criteria interact with the overall accountability system proposed in the request.

2.E Focus Schools

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

- 2.E.i** Did the SEA describe its methodology for identifying a number of low-performing schools equal to at least 10 percent of the State’s Title I schools as focus schools? If the SEA’s methodology is not based on the definition of focus schools in *ESEA Flexibility* (but is instead, e.g., based on school grades or ratings that take into account a number of factors), did the SEA also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department’s “Demonstrating that an SEA’s Lists of Schools Meet ESEA Flexibility Definitions” guidance?
- Note to Peers: Staff will review 2.E.i.a.
 - Is the SEA’s methodology for identifying focus schools educationally sound and likely to ensure that schools are accountable for the performance of subgroups of students?

2.E.i.b Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> OSSE will identify a school as a focus school if its proficiency and growth index score is between 25 and 34 or if it is in the bottom 10 percent of schools for graduation rate for only one year (see chart on p. 86). However, OSSE is not properly identifying focus schools as it does not appear to be incorporating achievement gaps into the process for identifying focus schools, as required.
<i>Strengths</i>	<ul style="list-style-type: none"> None provided.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • OSSE does not provide its business rules or methodology for developing the cut scores for focus schools, thus creating the impression that the cut score are arbitrary. • It is not evident what the difference is between a school receiving a score of 34, which would be identified as a focus school, and one receiving a score of 35, which would be a developing school. The lack of criteria for setting the cut scores make it more likely that errors will occur in accurately identifying focus schools as well as identifying schools in the other categories. • There is no reference to achievement gaps and how focus schools are identified in relation to gap size.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should provide its methodology for development of the cut scores for identifying focus schools. OSSE should also explain how these scores reflect achievement gaps.

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

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

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

2.E.iii Panel Response*Tally of Peer Responses: 0 Yes, 6 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • OSSE states that it will make tools available to LEAs and focus school improvement teams to help them assess their needs, develop a plan for improvement, and implement action steps. OSSE will also evaluate, support, and monitor focus schools around instructional leadership, curriculum, professional development, instruction, assessments, staff evaluation, human capital, and financial/asset management (pg. 86). It will require the development of a one-year improvement plan with mid-year and annual performance targets, set by each LEA in consultation with Focus schools and parents, focused on academic achievement, school climate, community and parent involvement, and resource management (p. 87). • However, OSSE provided little detail about the intervention process – how they are determined, implemented and monitored, creating concerns from peers about the viability of successful interventions.
<i>Strengths</i>	<ul style="list-style-type: none"> • None provided.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Examples of and justifications for interventions in focus schools were not provided. Interventions likely to reduce achievement gaps among subgroups, including English Learners and students with disabilities, were not specifically discussed. • Peers had concerns for the sustainability of progress if only one year of implementation is mandated. • Clarity is needed over OSSE’s level of authority and involvement in ensuring the interventions are implemented, monitored, and linked to outcomes for students, particularly in charter schools identified as focus schools.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should describe research-based interventions that may help reduce achievement gaps and support growth for all students.

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

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

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

2.E.iv and 2.E.iv.a Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> OSSE will determine sufficient progress in three areas: student achievement results (measured by DC CAS), data on the leading indicators (using a 3-point system), and school-level progress of intervention implementation (p. 93). OSSE plans to evaluate focus schools on the level of implementation for each of the intervention’s targeted activities. Connection between the application of the exit criteria and the use of the overall accountability system process is unclear in OSSE’s request and suggests that schools/LEAs will have overlapping systems with little coherence. Furthermore, there is no guidance on how these exit criteria are calculated.
<i>Strengths</i>	<ul style="list-style-type: none"> OSSE provides three criteria for exiting schools from focus school status.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Examples of “targeted activities” which focus schools might implement should be provided for clarification. Peers had concerns for the sustainability of progress if only one year of implementation is mandated. In the table shown on page 94, a school that failed to make progress for three years, made progress in the fourth year, and exited focus status in the fifth year. It is not clear how OSSE will determine if this “progress” is sufficient for such a school to exit focus status. OSSE does not clearly explain the exit process and associated multiple criteria, including the three point scale and apparent multiple methods for exit from focus status – nor does it provide a clear connection between the exit criteria and the methodology for the proposed overall accountability system (which is also not clearly defined).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should provide the methodology for determining eligibility for exiting focus status and provide clarity on how these criteria interact with the overall accountability system proposed in its request. • OSSE should reconsider whether a focus school can exit after making sufficient progress for only one year.

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

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

2.F.i Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • OSSE asks LEAs with schools that do not meet their AMOs to assess the LEA’s implementation of indicators of effective practice; select priority objectives aligned to those indicators; plan action steps to address deficiencies related to those objectives; implement those action steps; and evaluate progress (p. 98). OSSE provides a table illustrating the level of engagement by OSSE with respect to LEAs and schools based on school designation (p. 99). Incentives include autonomy over activities, flexibility in the use of federal funds, eligibility to receive financial reward, and recognition (see table on p. 99). • OSSE’s role in this system is vague and does not seem to position it to provide incentives and supports for other Title I schools that, based on OSSE’s new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • OSSE includes specifics regarding what LEAs that have schools that do not meet their AMOs must do as part of their application for Title I funds (p. 98).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • It is not clear that the incentives OSSE lists will motivate schools to improve. OSSE should provide greater detail on what the differentiated levels of engagement translate into for schools/LEAs. • There is a lack of clarity regarding the definition or function of the statewide network of tiered support (p. 97). Furthermore, if there is a network, OSSE’s role in activating it and connecting it to the work described in the request is not clear. • OSSE does not specify what the incentives and supports look like, or how they are tied to subgroup performance on AMOs. • Peers consider the index score for a “rising school” to be low and would like more clarity on why this was determined to be adequate by OSSE.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should provide a detailed plan or outline to ensure that the incentives and supports for other Title I schools are part of a cohesive system.

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

2.F.ii Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> OSSE does not provide a theory of action or evidence about how the incentives and supports will improve student achievement, close achievement gaps, or increase the quality of instruction for all students. English Learners and students with disabilities are not mentioned. Given the more or less “voluntary” nature of the “interventions” and the relatively low level of OSSE engagement shown in the table on p. 99, it is not certain that the incentives and supports will be likely to improve student achievement, close achievement gaps, and increase the quality of instruction for all students, including English Learners and students with disabilities.
<i>Strengths</i>	<ul style="list-style-type: none"> None provided.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Supports for English Learners and students with disabilities are not explicitly mentioned in this part of the request. Because OSSE does not propose to mandate or tightly monitor the interventions, it is not certain that the incentives and supports will be likely to improve student achievement, close achievement gaps, and increase the quality of instruction for all students, including English Learners and students with disabilities.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> OSSE should provide evidence that the interventions proposed are likely to lead to improved student performance, especially for English Learners and students with disabilities.

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?*
 - ii. Is the SEA’s process for ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools under the SEA’s differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources) likely to result in successful implementation of such interventions and improved student achievement?
 - iii. Is the SEA’s process for holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools, likely to improve LEA capacity to support school improvement?

2.G (including i, ii, and iii) Panel Response*Tally of Peer Responses: 0 Yes, 6 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • OSSE focuses primarily on the potential role of the CCSS in improving student learning and closing achievement gaps (p. 102). OSSE also provides examples of professional development training and toolkits for addressing the needs of students with disabilities in general education settings. It mentions providing support to LEAs for using a variety of data. OSSE has also formed a teacher effectiveness team that will provide exemplars, technical assistance and training to LEAs and will coordinate peer reviews and other intra-district collaboration (p. 104). • OSSE’s strategy to make recommendations and provide support to schools to implement the recommendations will likely serve to build school capacity to improve student performance. However, it is not clear that OSSE has the authority to develop a rigorous review and approval of LEA or school plans. Thus, the role of OSSE appears to be one of a technical assistance provider (and publisher of assessment and other results). • There does not appear to be a stated mechanism to address schools that fail to implement intervention plans or do not do so successfully. It is unclear what happens to these schools – does OSSE have authority and willingness to require changes and, if so, does OSSE have capacity to exercise this authority? There is little clarity in the request to answer these questions.
<i>Strengths</i>	<ul style="list-style-type: none"> • In its request, OSSE outlined a number of resources and activities that have the potential to build LEA and school capacity to develop school improvement plans and to implement these plans.

<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • There is no discussion of specific subgroup needs. There is no implementation plan or discussion of OSSE’s capacity to provide support for LEAs and schools. There is no process described for the identification and vetting of “high quality partners with experience and expertise applicable to the needs of the school.” There is no discussion of whether the levels of support for implementation are sufficient. • The apparent inability of OSSE to take action against schools who fail to implement intervention plans or fail to do so successfully is of concern to the peer reviewers. • The lack of clarity around OSSE’s authority, willingness and capacity to address these situations is of major concern.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should review what additional resources (<i>i.e.</i>, authority and relationship with LEAs) it has available in order to address the needs of LEAs and schools for which it is responsible.

Principle 2 Overall Review

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

Principle 2 Overall Review Panel Response*Tally of Peer Responses: 0 Yes, 6 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • In several key areas within this principle, the request is lacking in details about OSSE’s methodology with respect to critical aspects of the system of differentiated recognition, accountability and support. • For example, with the overall accountability system used for identification of priority, focus, and reward schools, the request lacked information about how subgroup performance factored into the overall index, how cut scores were determined for identification, how AMOs were connected to the indexing process and how graduation rates were addressed (other than as seeming add-ons to the indexing process). Furthermore, the exit criteria proposed for priority and focus schools introduced new criteria without making an explicit link to the accountability index process. • The request did not provide a clear connection between suggested interventions and the targeted and differentiated needs of schools in different classifications. • The responses to items in the request related to students with disabilities and English Learners were often incomplete and disjointed. • The request lays out a mechanism for OSSE to provide suggested improvement strategies and interventions for its priority, focus, and other Title I schools not making progress. OSSE, however, does not indicate that it has the authority to close schools, reconstitute them, or any such ultimate interventions. Schools (particularly charter schools) may choose whether they follow OSSE or PCSB recommendations. Ultimately, this weakens the ability of the SEA to intervene where needed.
<i>Strengths</i>	<ul style="list-style-type: none"> • OSSE indicates that it will identify schools beyond the minimum number of schools that it is required to identify (p. 83).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • OSSE has not laid out a step-by-step process for how the assessments are utilized, how the scores that are generated from those assessments are factored in, how the results for subgroups are incorporated into the overall school score, and how that score translates into progress toward AMOs. The lack of such a process explanation makes the identification of different categories of schools appear arbitrary. • Although targets around graduation AMOs are cited, there is no clear relationship to the process by which schools with low-graduation rates are identified, intervened in, and supported. • There is a discrepancy between the AMOs set out in the addendum and the process detailed in the request narrative. • It is not clear what OSSE’s authority is to close schools, reconstitute them, or any such ultimate interventions. Schools (particularly charter schools) can choose whether they follow OSSE or PCSB recommendations. Ultimately, this lack of clarity weakens the ability of OSSE to intervene where needed. The apparent inability of OSSE to take action in schools who fail to implement intervention plans or fail to do so successfully is of concern to the peer reviewers. Lack of clarity around OSSE’s authority, willingness, and capacity to address these situations is of major concern. • Examples of and justifications for interventions were not provided. Interventions likely to reduce achievement gaps among subgroups including English Learners and students with disabilities were not discussed.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should provide evidence that the interventions proposed will likely lead to improved student performance, especially for English Learners and students with disabilities. • OSSE should provide a detailed plan or outline to ensure that the incentives and supports are part of a cohesive system. • OSSE should consider empanelling a Technical Advisory Committee, or consulting with experts in the field, to refine its approach to its accountability system. • For the overall accountability system used for identification of priority, focus, and reward schools, OSSE should provide a step-by-step explanation of its methodology, including how subgroup performance is factored into the overall index, how cut scores are determined for identification, how AMOs are connected to the indexing process and how graduation rates are addressed (other than as seeming add-ons to the indexing process). • OSSE should clarify how existing required ESEA subgroup populations will be included in the proposed accountability system; the system does not appear to include subgroups or demonstrate progress over time. • For priority and focus schools, OSSE should provide its methodology for determining eligibility for exiting status and provide clarity on how these criteria interact with the overall accountability system proposed in the request. • OSSE should explain how participation rate is accounted for in its accountability system, as well as how the scores of students with the most significant cognitive disabilities who take the alternate assessments are included in the system. • OSSE should clarify its approach to setting AMOs (as the submissions are not aligned).

Principle 3: Supporting Effective Instruction and Leadership

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

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

If the SEA selected **Option A**:

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

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

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

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

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • OSSE’s request does not clearly describe its plan for developing and adopting guidelines. Therefore, reviewers are unable to determine the likelihood that OSSE will adopt such guidelines by the end of the 2011–2012 school year.
<i>Strengths</i>	<ul style="list-style-type: none"> • OSSE indicates that, in the process of putting together its flexibility request, teachers and principals provided input on the educator evaluation system.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • OSSE has provided insufficient information regarding its plan for developing and adopting guidelines. For example, while OSSE outlines a plan, considerable details are missing, such as the step-by-step processes that OSSE will use in developing the standards (the process that begins on April 1).
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should specify more clearly its timeline and plan for developing and adopting guidelines.

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

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

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

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • While OSSE does not articulate a plan in this request, it does indicate that teachers and principals will be prominently involved in the development of its guidelines (pp. 107-108). The manner in which these individuals will be involved is not detailed.
<i>Strengths</i>	<ul style="list-style-type: none"> • OSSE solicited feedback during the development of the request process but will also rely on the RTTT Human Capital Task Force to inform ongoing decision-making. • OSSE will also seek input from other stakeholder groups.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • OSSE does not describe the manner in which teachers and principals will be involved in the development of its guidelines. • OSSE provides no information on how feedback will be assessed and under what conditions it may lead to modifications.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should specify more clearly how educators have been or will be involved in the development of the guidelines. • OSSE should develop a process for systematically soliciting and evaluating stakeholder input. This would create a level of transparency that may increase stakeholder faith in the process. OSSE should also be explicit about any modifications made as a result of stakeholder input.

iii. Note to Peers: Staff will review iii.

If the SEA selected Option B:

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

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

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

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

Tally of Peer Responses: NA

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

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

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

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

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

Tally of Peer Responses: NA

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

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

- 3.A.ii** Are the SEA’s guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — *i.e.*, will they promote systems that:
- a. Will be used for continual improvement of instruction?
 ➤ *Are the SEA’s guidelines likely to result in support for all teachers, including teachers who are specialists working with students with disabilities and English Learners and general classroom teachers with these students in their classrooms, that will enable them to improve their instructional practice?*

3.A.ii.a Panel Response

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

Tally of Peer Responses: NA

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

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

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

3.A.ii.b Panel Response

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

Tally of Peer Responses: NA

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

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

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

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

Tally of Peer Responses: NA

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

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

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

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

Tally of Peer Responses: NA

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

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

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

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

Tally of Peer Responses: NA

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

d. Evaluate teachers and principals on a regular basis?

3.A.ii.d Panel Response

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

Tally of Peer Responses: NA

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

- e. Provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development?
 - *Will the SEA’s guidelines ensure that evaluations occur with a frequency sufficient to ensure that feedback is provided in a timely manner to inform effective practice?*
 - *Are the SEA’s guidelines likely to result in differentiated professional development that meets the needs of teachers?*

3.A.ii.e Panel Response

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

Tally of Peer Responses: NA

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

- f. Will be used to inform personnel decisions?

3.A.ii.f Panel Response

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

Tally of Peer Responses: NA

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

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

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

3.B Panel Response*Tally of Peer Responses: 0 Yes, 6 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • OSSE does not present a process that seems likely to ensure implementation. It presents an intention and a timeline; however, the timeline is unclear with respect to when different aspects of the system (guidelines, system requirements, etc.) will be approved and operational. • On page 117, OSSE indicates that it will review and approve LEA educator evaluation systems, but the timeline for this is not realistic if changes are needed prior to system implementation. • According to OSSE, this system will not apply to the public charter schools that chose not to accept RTTT funds (p. 117). All Title I LEAs with priority and focus schools will have to create educator evaluation systems and submit their educator evaluation systems to OSSE for review and approval (p. 118).
<i>Strengths</i>	<ul style="list-style-type: none"> • At least all Title I LEAs with priority and focus schools will have to create educator evaluation systems and submit their educator evaluation systems to OSSE for review and approval. • OSSE is making explicit connections between its work in teacher evaluation and college- and career-ready standards (p. 114).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The timeline is inconsistent with the request materials. The request materials present what appear to be evaluation requirements that are currently being used, but the timeline on page 119 suggests that the requirements are still subject to revision and will not be finalized until January 2013. • Only the Title I LEAs with priority and focus schools will have to create educator evaluation systems and submit their educator evaluation systems to OSSE for review and approval, which suggests to peers that this requirement cannot be fully met • It is unclear whether OSSE has authority over charter schools and if this would effectively hinder its ability to meet this requirement. OSSE discussed this on the call, but peers still felt more clarity was needed in addition to a better understanding of how OSSE could meet the requirements given their understanding of their role. • The timeline for review of LEAs' teacher/leader evaluation systems is unrealistic, if changes are needed, to ensure implementation by the required timeline.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Given OSSE's understanding of their potential to assure LEAs enact educator evaluation and support systems, please clarify how OSSE will they meet this requirement

Principle 3 Overall Review

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

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

Principle 3 Overall Review Panel Response*Tally of Peer Responses: 0 Yes, 6 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> Given the inconsistencies brought to light in prior review responses, it is impossible to be certain of OSSE's plan. There are too many details of the educator evaluation plans, activities, and schedules that simply are not addressed in OSSE's request, which is surprising given that OSSE was given RTTT funding that included the requirement for work on educator evaluation. The request alludes to such work (without giving details) in several places in Principle 3.
<i>Strengths</i>	<ul style="list-style-type: none"> OSSE seeks to work within the unique boundaries of its power and allow as much autonomy to its LEAs as possible. OSSE acknowledged the need to create a high-quality educator evaluation system and identified several relevant areas where work is needed.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> OSSE's difficulty in determining its potential role with respect to requiring educator evaluation systems in its LEAs is reflected in the lack of specificity in its plan and the absence of concrete processes for implementation. The plan does not acknowledge the magnitude of the challenge of governing a system with 54 distinct educator evaluation systems. Although this was discussed on the call, peers still had concerns that OSSE lacks clarity about its role in assuring these activities. Much more detail on the educator evaluation plans, activities, and schedules are needed for peers to feel comfortable that OSSE will implement an educator evaluation system that addresses Principle 3.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> OSSE needs to determine the boundaries of its power and create a plan that is consistent with those boundaries. Similarly, OSSE needs to create a specific process for implementation. If its implementation plan is dependent upon the work of LEAs, then that needs to be clarified in the request. OSSE should provide detail on the educator evaluation plans, activities, and schedules it is using to ensure LEAs implement an educator evaluation system that addresses Principle 3.

Overall Request Evaluation

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

Overall Request Evaluation Panel Response

<i>Response Component</i>	<i>Peer Panel Response</i>
Rationale	<ul style="list-style-type: none"> • OSSE only sketched an outline of its revised accountability effort (Principle 2) and incomplete information on the plans, activities, and schedules to accomplish the work on Principle 3. These deficiencies, combined with the hands-off approach required for public charter schools and LEAs, probably means that implementation of high-quality programs required to receive flexibility from the current ESEA requirements cannot be assured. • There were repeated areas in which additional information, rationale, and methodology for processes were lacking. For Principle 2, the foundation of OSSE's identification system its accountability index process was unclear and the request did not provide assurances that it included the necessary components. • With regard to the AMO-setting process, OSSE described one process in the narrative, but its supplemental information provided different information. • For identification of schools as priority, focus and reward, the request does not provide the methodology for determining cut scores and for the exit process. OSSE proposed a different system for analyzing progress without explicit or coherent connections to the analyses proposed for the overall accountability system. • Finally, the needs of English Learners and students with disabilities were not consistently or systematically addressed throughout the request, whether in the accountability process or in the identification of interventions for schools with persistent achievement gaps. This was of great concern to the peers.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> ● OSSE has addressed the various principles in some form, and has clearly laid out the hindrances in addressing those principles. ● OSSE solicited feedback and input from teachers, their representatives, and other stakeholders in the development of the request. ● OSSE has done significant work in cross-walking existing standards to the CCSS and is deeply involved in the PARCC assessment consortium in examining and preparing for new assessments. OSSE has formed partnerships with different groups (<i>e.g.</i>, NCSC, CCSO, PARCC, UDC) that position it to potentially implement aspects of the flexibility request.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> ● Throughout the request, there is a lack of clarity and coordination. There is also a great deal of superfluous information about LEA-specific systems that does not show alignment to OSSE’s plan. There is little or no mention of the needs of students with disabilities and English Learners and how OSSE is going to respond to those needs as required by the request process. ● The request is lacking a coherent, comprehensive and high-quality plan with explicit links between its activities to transition to college and career ready standards. ● The request does not elaborate on awareness and capacity building for teachers, parents, and other stakeholders around the need for college- and career-ready standards for all students. This would include information and materials on the impact of this transition to these standards, with details about related assessments and activities that highlight the impact of this transition on students in all subgroups. ● In several key areas within its description of the system for differentiated recognition, accountability and support, the request is lacking in details about methodology for critical aspects of the system, justification for and systems of delivery, and monitoring for interventions. For example, with regard to the overall accountability system used for identification of priority, focus, and reward schools, the request lacked information about how subgroup performance factored into the overall index, how cut scores were determined for identification, how AMOs are connected to the indexing process and how graduation rates are addressed (other than as seeming add-ons to the indexing process).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Furthermore, the exit criteria proposed for priority and focus schools introduced new criteria without making an explicit link to the accountability index process. OSSE appears to have adopted an “on-demand” technical assistance approach to its work with LEAs. Peers are not certain that this will lead to high-quality programs, that the needs of students with disabilities and English Learners will be addressed, and that reduction of the gaps in student achievement and growth in percentages of students college and career ready will occur. • Despite OSSE’s previous work on educator evaluations to improve instructional quality through the RTTT opportunity, OSSE lacks a clear and cohesive plan for bringing all LEAs to a point of implementing evaluation systems that meet the requirements in this flexibility opportunity.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • OSSE should provide a plan that addresses the needs of special populations for accessing college- and career-ready standards as part of a coherent, comprehensive and high-quality plan with explicit links between activities to transition to college- and career-ready standards. • OSSE should elaborate on awareness and capacity building for teachers, parents, and other stakeholders around the need for college- and career-ready standards for all students. This would include information and materials on the impact of this transition to these standards, with details about related assessments and activities that highlight the impact of this transition on students in all subgroups. • OSSE should provide evidence that the interventions proposed throughout the request will likely lead to improved student performance, especially for English Learners and students with disabilities, and provide a detailed plan or outline to ensure that the incentives and supports are part of a cohesive system. • OSSE should consider empanelling a Technical Advisory Committee, or consulting with experts in the field, to refine its approach to its accountability system.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • For the overall accountability system used for identification of priority, focus, and reward schools, provide a step-by-step explanation of the methodology, including how subgroup performance is factored into the overall index, how cut scores were determined for identification, how AMOs are connected to the indexing process and how graduation rates were addressed (other than as seeming add-ons to the indexing process). • For priority and focus schools, OSSE should provide the methodology for determining eligibility for exiting that status and provide clarity on how these criteria interact with the overall accountability system proposed in the request. • OSSE should clarify how existing required ESEA subgroup populations will be included in its proposed accountability system; the system does not appear to include subgroups, or demonstrate progress over time. • OSSE should explain how participation rate would be accounted for in the system, as well as how the scores of students with the most significant cognitive disabilities who take alternate assessments are included in the accountability system. • OSSE should clarify its approach to setting AMOs (as its submissions are not aligned). • OSSE needs to determine the boundaries of its authority and create a plan that is consistent with those boundaries. Similarly, OSSE needs to create a specific process for implementation of its request. If its implementation plan is dependent upon the work of LEAs, then that needs to be clarified in the request. • OSSE should provide detail on the educator evaluation plans, activities, and schedules being used by OSSE to ensure LEAs implement an educator evaluation system that addresses the principles found in the application for flexibility.