ESEA Flexibility

Peer Panel Notes

State Request: Illinois

Date: 3/26/12

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.

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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

Response Component	Peer Panel Response
Rationale	The Illinois State Board of Education (ISBE) discussed its flexibility request and collected survey comments at seven regional informational meetings and 20-plus other stakeholder meetings in which the two teachers associations participated and in some cases cosponsored. In such meetings, a small number of teachers (see Attachment 2) participated. These notice-and-comment meetings occurred fairly close to the flexibility request deadline and did not provide an opportunity for design collaboration. ISBE also convened an advisory group, including teachers and teachers' association members, "that served . . . throughout the waiver process" in a fashion that is not further explained (p. 9). The limited survey data presented indicate only modest support for Part 2 of the proposal and a degree of enthusiasm (>55% "strongly support") only for Part 1. Greater teacher association participation in the design of the teacher evaluation system (Part 3) has occurred since 2010. Teachers and their associations and other stakeholders have received ample notice of what is in the flexibility request, but outside the teacher-evaluation context may not have had the opportunity to participate in design activities that best facilitates subsequent implementation.

Strengths	1. ISBE held 29 stakeholder meetings, attended by nearly 1700 people, providing ample opportunity for teacher organizations to provide input, including some meetings cosponsored by teacher organizations (pp. 9-10; Attachment 2, p. 1). 2. ISBE used a subset of the 29 meetings to target teachers and their organizations (p. 9; Attachments 2, 3, pp. 61-62). NEA and AFT affiliates as well as a small number of teachers participated at most events for which data are available (Attachment 2: survey information on 7 of 29 meetings, from Nov. 2011 to Feb. 2012). 3. A Performance Evaluation Advisory Council (PEAC) was created in 2010, including union leaders. PEAC meets monthly to advise ISBE on the teacher evaluation system. PEAC held forums around the state in which 2300 educators participated (p. 9). 4. A group of 30 stakeholders was convened to assist ISBE in developing the waiver flexibility request, including teachers, as well as central and regional staff, district superintendents and staff and principals, which ISBE used in some fashion during the design period to vet ideas and gauge support (pp. 9-10; Attachment 2, p. 10). One meeting of 20 members of this group early in the process is described, at which two teachers were present. It is unclear, from the request, how the group functioned, how often it met, how it provided views, and on what topics it provided views. 5. ISBE devoted a website page to the flexibility request (pp. 10, 25). 6. ISBE paid close attention to the views of the Consolidated Committee of Practitioners (CCOPs), a group the state board has convened for some years to advise it on ESEA matters and appears to take a professional and merits-based approach to the issues (pp. 10-11; Attachment 2, p. 36 (State Board minutes)). 7. Participation by teachers associations was sufficient to trigger CCOPs criticism that the associations exercised too much influence over the design of the teacher evaluation system (Attachment 2, p. 36). 8. ISBE partnered with teachers unions and 34 teachers to conduct Common Core State Standads (CCSS) gap analysis in 2010. 9. ISBE offered one example of utilizing stakeholder input to change an element in the flexibility request to include the creation of a subgroup comprised of former English Learners.

Weaknesses, issues, lack of clarity	1. The flexibility request provides limited examples of changes made in response to teacher and other stakeholder concerns.
	2. Teachers were engaged via conference-type presentations with an opportunity for survey comments at 7 of the 29 meetings (Attachment 2), but most meetings were close to the filing date, mainly in February and did not offer an opportunity to participate in actual design (apart from the educator evaluation component via PEAC). This raises concerns about how meaningful the engagement was.
	3. There was no evidence in the flexibility request application as to ISBE's consultation with the charter school community related to the waiver proposal.
	4. There is some evidence of changes to Principle 2 as a result of educator/stakeholder input.
Technical Assistance Suggestions	1. ISBE should consider adopting a strategy to involve teachers and other stakeholders in the design of core implementation activities to take fuller advantage of teacher knowledge and to promote teacher support.

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

Response Component	Peer Panel Response
Rationale	ISBE held over two dozen "notice and comment" meetings on the flexibility request to gather input and reactions (including via the use of surveys at seven meetings). There were five meetings focused on diverse populations, including students with disabilities and English Learners. Most of the meetings occurred close to the flexibility request deadline and did not provide stakeholders with an opportunity to collaboration on design and participate in activities that facilitated implementation and enthusiasm. The survey data presented indicate only modest support for Part 2 of the proposal and a degree of enthusiasm (>55% "strongly support") for Part 1.
Strengths	1. ISBE conducted broad outreach to stakeholders via 29 meetings, including at least five meetings that targeted groups attentive to students with disabilities (meetings 5, 9, 10), English learner students (meetings 7, 9, 22) and minority students (meetings 7, 9, 22). (p. 10; Attachment 3, pp. 61-2.) 2. The flexibility request lists five examples of concerns expressed by particular constituencies and two examples of design decisions made based on suggestions from consultation meetings (e.g., customized AMOs for each district and schools and treating "former [English Learners] ELs" as a sub-group) (pp. 10-11). 3. ISBE devoted a website page to the flexibility request (pp. 10, 25). 4. The flexibility request reports that "teachers communicated their support for ISBE's proposal of a Multiple Measures Index as the crux of our new differentiated accountability system and helped ISBE staff understand the types of assistance they need" in regard to issues involving students with disabilities and English Learners (p. 9). Also, stakeholders encouraged ISBE to identify a way to incorporate graduation rates for students with disabilities who have until their 22nd birthday to graduate. 5. Information on one meeting indicates that 107 parents and 8 students attended (Attachment 2, p. 45). 6. ISBE paid close attention to the views of the Consolidated Committee of Practitioners (CCOPs), a group the state board has convened for some years to advise it on ESEA matters and appears to take a professional and merits-based approach to the issues (p. 10-11; Attachment 2, p. 36 (State Board minutes)).

Weaknesses, issues, lack of clarity	1. Stakeholders were engaged via conference-type presentations with an opportunity for survey comments at seven of the 29 meetings (Attachment 2), but most meetings were close to the flexibility request filing date, mainly in February and did not offer an opportunity to participate in actual design (apart from the educator evaluation component via PEAC). 2. The flexibility request reported the differing views of various stakeholders (p. 10-11), but only limited evidence of how the views affected the content of the application aside from two examples above. 3. Apart from the meeting with Chicago Public Schools and board minutes reflecting presentations by CCOPs, data suggest somewhat tepid support for Part 2 of the application (a small majority "strongly supporting"; significant numbers "not supporting"), a bit more support for Part 3, and fairly strong support for Part 1 (Attachment 2, survey responses for 7 of 29 meetings).
Technical Assistance Suggestions	None.

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: 3 Yes, 3 No

Response Component	Peer Panel Response
Rationale	ISBE has adopted the CCSS; publicized them to stakeholders statewide; cross-walked them with prior standards: is working with Word-Class Instructional Design and Assessment (WIDA) to align the English Language Proficiency (ELP) standards for English Learners; continued commitment to equitable access for students with disabilities to rigorous core instruction; created a process for aligning higher education teacher-preparation curricula for pre-K through middle schools teachers; and is creating a coordinated regional support structure, tool set and trainings on which LEAs can draw in carrying out their massive responsibility to transition curricula, learning materials, instruction, and assessments to the CCSS. Apart from an online tool of uncertain functionality that LEAs can use to identify key steps they must take, ISBE does not appear to have undertaken a responsibility to assure that LEAs go through the planning steps in a timely, rigorous and organized fashion; to provide a model structure through which LEAs can support that transition in schools (e.g., central and school-level transition coordinators and teams); to assure that LEAs take part in available training and become proficient in the transition tools; or to monitor the quality of transition efforts in schools. ISBE thus does not appear, as yet, to have a realistic high-quality transition plan that is capable of assuring that students, including English Learners and students with disabilities, in many LEAs and schools will have access to instruction and assessments aligned to the new standards as of 2013-14. Contingent upon filling in project management, implementation, and timeline gaps, the proposal has promise for successful transition to CCSS

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Strengths	1. ISBE adopted CCSS in 2010, and partnered with teachers unions and 34 teachers to conduct gap analysis in 2010 (p. 16). 2. The flexibility request lists 11 general categories of actions LEAs should take during CCSS transition (e.g., "Identify plans for curriculum changes,") (pp.20-21). 3. ISBE provided information on CCSS to the public, parents and LEAs via a website page, video, webinars, and regional meetings (p. 25) 4. ISBE conducted alignment and 'successful strategies' workshops with higher education institutions, for several reasons, including to develop 'legislative rules' governing new teacher preparation curricula for pre-K and elementary/middle schools (pp. 22, 33, 34). ISBE also worked with high education institutions to establish new licensing cut scores to make them more rigorous. 5. ISBE conducted summer institutes for teachers and principals (2011) and LEA administrators (2012) on CCSS (p. 33). 6. ISBE is providing implementation guidance and supports to LEAs in the following ways: development of an on-line planning tool; Achieve rubrics to conform instructional materials to CCSS; CTE performance tasks pilot (career readiness); developing a contract for LEAs to use to procure CCSS-aligned interim assessments (in process; no timeline); creating checklists, lesson plan strategies, PD needs assessments and on-line modules for high school English language arts teachers; learning standards workshops; instructional strategy series (pp. 33-34; listed in the Expectations Timeline, not otherwise described). 7. ISBE plans to create "The Center [for School Improvement]" to coordinate Statewide System of Support (SSOS) operating through regional offices, with 230 coaches and content specialists potentially available to assist in CCSS transition; coaches and content specialists to develop materials to support CCSS transition in collaboration with Achieve, students with disabilities and English Learner experts (Center RFP will be issued this spring; start up no earlier than Fall 2012) (pp. 28-29, 54-55, 65, 68-69, 77, 81). 8. ISBE has strengthened its existing Dual Credits program for high school students taking college courses by legislation requiring courses to have same requirements as those taken by college students (p. 23). 9. ISBE has addressed increasing rigor of existing assessments in advance of PARCC implementation by increasing grade 3-8 proficiency cut score and infusing tests with CCRR-aligned items: pilot 2012; implement 2013 10. Strengths include an analysis conducted by ACT, Inc. indicates that the PSAE 11th grade assessment is college-ready (aligned to ACT); adding EXPLORE-PLAN-ACT measure of 8th-to-11th grade growth; enhancing career-readiness (WorkKeys) part of PSAE assessment to require National Career Readiness Certificate (pp.30-31). (EXPLORE and WorkKeys subject to funding from legislature, pp.32, 47).

Weaknesses, issues, lack of clarity	1. The flexibility request lists stakeholder channels and communication tools ISBE uses for outreach, but describes their use for CCSS transition in aspirational terms (e.g., "communication should be structured to articulate that [CCSS] are improving the foundation to advance [teacher's] work") and provides no plan or timeline (p. 23-24; see Attachment 14:512).
	2. ISBE recognizes:
	    • the massive task, in absence of a statewide CCSS-aligned curriculum, to transition standards, curricula, lesson plans, instructional materials and assessments (see http://www.isbe.net/common_core/htmls/gap_analysis.htm: 150 of CCSS math and 250 ELA standards have no matches in prior standards and others previously taught in one grade must now be taught in another grade),
	    • that the transition to CSS requires 11 general steps in each LEA, and
	    • that LEAs will be required to address the transition and "demonstrate a local plan that results in the implementation of" CCSS by the end of the 2013-14 school year.
	However, the flexibility request:
	    • gives LEAs and schools primary responsibility to carry out the transition without sufficient project management support;
	    • provides no model structure (e.g., train-the-trainer process via LEA and school coordinators and implementation teams), plans, or detailed timeline for LEA implementation;
	    • does not indicate that any training was provided on implementation planning and management; and
	    • has no plan for monitoring the creation and implementation of LEA plans (pp.17, 20-21; see Timeline, p.33; Transition Activities, Attachment 14).
	3. There is no timeline provided for availability of CCSS-aligned interim assessments (p. 27) or establishment of the "Center" (pp. 28, 56, 65).
	4. ISBE's effort to transition to CCSS does not appear to include high schools, students with disabilities, or English Learners in its steps to align teacher prep curricula; and provides no plan, timeline, or monitoring as to these changes (p. 22).
	5. There is no public information strategy offered for planned cut-score revisions, which the recent New York State experience suggests will have a negative effect on improving schools and districts (suggesting gains weren't meaningful), unless correctly managed.
	6. ISBE provides no evidence that it has focused support on areas in which the new standards require curriculum and resources not required by the previous standards.

Technical Assistance Suggestions	1. Provide an outreach plan describing how ISBE will actually use the conduits and tools listed at pp. 23-26 to disseminate information about the CCSS. 2. Provide model implementation processes and plans LEAs can use in transforming their curricula, teaching materials, instruction and assessments; and plan to monitor implementation rigor. 3. Provide a timeline for aligning higher education teacher preparation curricula to CCSS and a plan or process for including curricula for high schools, students with disabilities and English Learner teachers in that process. 4. Provide a timeline and plan for providing procurement access to new CCSS-aligned interim assessments and establishment of the "Center." 5. Provide contingencies if funding for EXPLORE-PLAN-ACT assessment and WorkKeys enhancement isn't available, given how crucial this is to the overall strategy to transition to CCR assessments and the overall proposal. 6. Develop a public information plan to explain the drop in proficiency as a result of cut-score changes that puts the diminution in proficiency levels in context of past gains and "desire to raise the bar." 7. Consider reviewing models for project managing CCSS transition in use in other jurisdictions, including New York City, New York State, Arkansas, and Louisiana.

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

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

1.B Panel Response, Part B

Tally of Peer Responses: 4 Yes, 2 No

Response Component	Peer Panel Response
Rationale	ISBE has focused on CCSS-aligned standards for instructing all students, including English Learners and students with disabilities. It has provided some training and students with disabilities- and English Learners-related materials for use by LEAs undertaking the transition to the new standards. ISBE has been less clear about how it intends to shepherd LEAs through the process of actually changing their curricula, materials, instruction and local assessments as they relate to English Learners and students with disabilities and assuring parallel changes in teacher-prep programs. The flexibility request also lacks clarity about how ISBE intends to leverage its current efforts to address standards for teaching English Learners and students with disabilities to assist all teachers of such students to enable them to master the CCSS.

Strengths	1. ISBE obtained technical assistance from organizations focused on instruction of students with disabilities to help LEAs and local educators of these students make "connections to the CCSS," and "transition . . . to the CCSS" (p. 27). 2. ISBE is participating in the ASSETS project—"a next-generation comprehensive and balanced assessment system for ELLS in development by the WIDA consortium"— to develop formative assessments for English language proficiency (ELP) that are "correlated" to CCSS (p. 28). 3. ISBE is integrating education cooperatives and the Illinois Statewide Tech Assistance Center (focused on students with disabilities) into "the Center" and SSOS which will provide regional assistance to LEAs in CCSS transition (pp. 28-29, 54-55, 68-69, 77, 81) 4. ISBE has contracted with Illinois Resource Center to support CCSS rollout to English Learners teachers (p. 33) 5. ISBE has provided professional development to English Learners teachers in new CCSS-aligned curricular frameworks and WIDA standards (p. 34) 6. ISBE and the flexibility request continue to focus on educating students with disabilities in general education setting where CCSS is broadly implemented. 7. ISBE applied for and received a grant to further develop Spanish Language Development standards as an initiative to strengthen and support the instruction occurring in native language.

Weaknesses, issues, lack of clarity	1. The flexibility request focuses on CCSS alignment in developing new standards for ELP (pp. 17-20, 33); but lacks clarity on the achievement of CCSS for English Learners. 2. There is mention of developing the learning standards portion of Individualized Education Programs (IEPs) for students with disabilities, however, there lacks specificity about how CCSS-alignment will be attained (pp. 17-20). 3. While there is discussion of instruction for English Learners and students with disabilities, it is without assurances or specificity that these efforts will in fact transition and align to the CCSS, or help accommodate students' learning to achieve proficiency of the CCSS (pp. 17-20). The IEP revision process consists of "discussions" but no timeline or deliverables (p.20). Overall, there is insufficient specificity with regard to alignment of teaching of English Learners and students with disabilities in core content instruction with CCSS. 4. The flexibility request does not include students with disabilities- or English Learner-related steps in discussion of CCSS aligned of teacher preparation curricula (p. 22). In particular, it doesn't indicate that support or specific professional development will be provided for teachers of English Learners and students with disabilities in general education setting.
Technical Assistance Suggestions	1. With regard to the instruction of English Learners and students with disabilities, develop the process through which LEAs are expected to plan for and implement changes to their curricula, instructional materials, instruction and assessments; as well as how ISBE will assure LEA proficiency in these steps and in the use of tools being provided; and the monitoring of the effectiveness of the transition. 2. Include the needs of teachers of students with disabilities and English Learners in higher education's CCSS-focused realignment of teacher preparation curricula. 3. Develop a process to strengthen instruction of CCSS for English Learners and students with disabilities to ensure equitable access and achievement of those standards in general education settings.

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

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

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

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

1.C, Option B Panel Response
☒ *Not applicable because the SEA selected 1.C, Option A or Option C*
Tally of Peer Responses: X Yes, X No

Response Component	Peer Panel Response
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

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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: 4 Yes, 2 No

Response Component	Peer Panel Response
Rationale	The SEA's new standards and ISBE trainings, materials and assessments that are available to support LEAs' implementation of the new standards suggest that the transition to the CCSS could improve the quality of instruction for all students, including students with disabilities and English Learners. The new transitional summative assessments and cut points, and the coming PARCC assessments, add incentives for LEAs to transition effectively to the new standards and curriculum. For the reasons stated in 1.B. above, however, ISBE's steps to assure that the new standards are implemented and that the new materials and training are used to good effect by LEAs in developing and applying new local curricula, teaching materials, instruction and assessments may not suffice to assure that students will gain access to the new CCSS standards and that the quality of instruction and student outcomes improve as a result. In terms of implementation, there lacks a specific timeline with benchmarks that lay out how ISBE intends to support the roll out of CCSS to ensure it is successful and sustainable, including identification of specific obstacles and how they will be overcome.

Strengths	There are a number of overall strengths related to the requirements of Principle 1: - Alignment: Of current IL standards to CCSS, via a gap analysis, and revision of assessments - Implementation: Plans for the Center, with implementation through the regional delivery system, as well as materials and training for LEAs - Special Populations: Maintain focus on equitable access to rigorous core content instruction and strengthening instructional delivery across all teachers for students with disabilities and English Learners - Teacher Preparation: Alignment with teacher prep programs and changing certification requirements and cut scores Additional strengths include: 1. Adopted CCSS in 2010, and partnered with teachers unions and 34 teachers to conduct gap analysis in 2010 (p. 16). 2. Listed 11 general categories of actions LEAs should take during CCSS transition (e.g.,"Identify plans for curriculum changes,") (pp. 20-21). 3. Provided information on CCSS to public, parents and LEAs via website page, video, webinars, regional meetings (p.25). 4. Conducted alignment and 'successful strategies' workshops with higher education institutions, including to develop 'legislative rules' governing new teacher preparation curricula for pre-K and elementary/middle schools (pp. 22, 33, 34). Established new licensing cut scores to make them more rigorous. 5. Conducted summer institutes for teachers and principals (2011) and LEA administrators (2012) on CCSS (p. 33). 6. Providing implementation supports to LEAs: on-line planning tool Achieve rubrics to conform instructional materials to CCSS; CTE performance tasks pilot (career readiness); developing a contract for LEAs to use to procure CCSS-aligned interim assessments (in process; no timeline); developing checklists, lesson plan strategies, PD needs assessments and on-line modules for High School, ELA teachers; providing learning standards workshops; instructional strategy series (pp.33-34; listed in the Expectations Timeline, not otherwise described). 7. Plans to create "The Center [for School Improvement]" to coordinate Statewide System of Support (SSOS) operating through regional offices, with 230 coaches and content specialists potentially available to assist in CCSS transition; coaches and content specialists to develop materials to support CCSS transition in collaboration with Achieve, students with disabilities and English Learner experts (Center RFP issued this spring; start up no earlier than Fall 2012, pp. 28-29, 54-55, 65, 68-69, 77, 81). 8. Strengthened existing Dual Credits program for high school students taking college courses by legislation requiring courses to have same requirements as those taken by college students (p. 23). 9. Addressed increasing rigor of existing assessments in advance of PARCC implementation by increasing grade 3-8 proficiency cut score and infusing tests with CCRR-aligned items: pilot 2012; implement 2013. 10. Conducted analysis indicating that PSAE 11th grade assessment is college-ready (aligned to ACT); adding EXPLORE-PLAN-ACT measure of 8th-to-11th grade growth; enhancing career-readiness (WorkKeys) part of PSAE assessment to require National Career Readiness Certificate (p.30-31). (EXPLORE and WorkKeys subject to funding from legislature, p.32, 47). 11. Obtained technical assistance from organizations focused on instruction of students with disabilities to help LEAs and local educators of these students make "connections to the CCSS," and "transition . . . to the CCSS" (p. 27). 12. Participating in ASSETS project to develop formative assessments for ELP that are "correlated" to CCSS (p. 28). 13. Integrating education cooperatives and the Illinois Statewide Tech Assistance Center (focused on students with disabilities) into "the Center" and SSOS which will provide regional assistance to LEAs in CCSS transition (pp.28-29, 54-55, 68-69, 77, 81). 14. Contracted with Illinois Resource Center to support CCSS rollout to EL teachers (p.33). 15. Provided PD to EL teachers in new CCSS-aligned curricular frameworks and WIDA standards (p.34). 16. Focus on educating students with disabilities in general education setting where CCSS is broadly implemented.

Weaknesses, issues, lack of clarity	There are a number of weaknesses related to the requirements of Principle 1: - Implementation: Lack of a specific timeline with benchmarks that lay out how ISBE intends to support implementation of CCSS to ensure it is successful and sustainable, including identification of specific obstacles and how they will be overcome. - Special Populations: There lacks specificity about professional development and supports for general education teachers to ensure successful transition of CCSS for students with disabilities and English Learners. Additional weaknesses include: 1. The flexibility request lists stakeholder channels and communication tools ISBE uses for outreach, but describes their use for CCSS transition in aspirational terms (e.g., "communication <u>should be</u> structured to articulate that [CCSS] are improving the foundation to advance [teacher's] work") and provides no plan or timeline (pp. 23-24; see Attachment 14:512). 2. ISBE recognizes: • the massive task, in absence of a statewide CCSS-aligned curriculum, to transition standards, curricula, lesson plans, instructional materials and assessments (see http://www.isbe.net/common_core/htmls/gap_analysis.htm: 150 of CCSS math and 250 ELA standards have no matches in prior standards and others previously taught in one grade must now be taught in another grade), • 11 general steps the transition requires in each LEA, and • that LEAs' will be required to address the transition and 'demonstrate a local plan that results in the implementation of' CCSS by the end of 2013-14. However, ISBE • gives LEAs and schools primary responsibility to carry out the transition without sufficient project management support; • provides no model structure (e.g., train-the-trainer process via LEA and school coordinators and implementation teams), plans, or detailed timeline for LEA implementation; • does not indicate that any training was provided on implementation planning and management; and • has no plan for monitoring the creation and implementation of LEA plans (p.17, 20-21; see Timeline, p.33; Transition Activities, Attachment 14). 3. Provides no timeline for availability of CCSS-aligned interim assessments (p. 27) or establishment of the "Center" (pp. 28, 56, 65). 4. Doesn't appear to include High School, students with disabilities, or English Learners in its steps to align teacher prep curricula to CCSS; and provides no plan, timeline, or monitoring as to these changes (p. 22). 5. Offers no public information strategy for planned cut-score revisions, which recent New York State experience suggests will have a negative effect on improving schools and districts (suggesting gains weren't "real"), unless correctly managed. 6. No evidence that ISBE has particularly focused support on areas in which the new standards require curriculum and resources not required by the previous standards. 7. The flexibility request focuses on CCSS alignment in developing new standards for English language proficiency (ELP) (pp. 17-20, 33); but lacks clarity on the transition to and achievement of CCSS for English Learners. 8. There is mention of developing the learning standards portion of IEPs for students with disabilities, however, there lacks specificity about how CCSS-alignment will be attained (pp. 17-20). 9. While there is discussion of instruction for English Learners and students with disabilities, it is without assurances or specificity that these efforts will in fact transition and align to the CCSS, or help accommodate students' learning to achieve proficiency of the CCSS (pp. 17-20). The IEP revision process consists of "discussions" but no timeline or deliverables (p. 20). 10. Overall, insufficient specificity with regard to alignment of teaching of English Learners and students with disabilities in core content instruction with CCSS. Does not explain how ISBE is leveraging the creation of new standards for English Learners and students with disabilities and their use of Project CHOICES to assist teachers of students with disabilities and English Learners to master the CCSS. 11. Does not include students with disabilities- or English Learners-related steps in discussion of CCSS aligned of teacher preparation curricula (p. 22). In particular, doesn't indicate support provided or specific professional development for teachers of English Learners and students with disabilities in general education setting.

Technical Assistance Suggestions	1. Provide outreach plan describing how ISBE will actually use the conduits and tools listed at pp. 23-26 to disseminate information about the CCSS. 2. Provide model implementation processes and plans LEAs can use in transforming their curricula, teaching materials, instruction and assessments and plan to monitor implementation rigor. 3. Provide a timeline for aligning higher education teacher preparation curricula to CCSS and a plan or process for including curricula for High School, students with disabilities and English Learner teachers in that process. 4. Provide a timeline and plan for providing procurement access to new CCSS-aligned interim assessments and establishment of the "Center." 5. Provide contingencies if funding for EXPLORE-PLAN-ACT assessment and WorkKeys enhancement isn't available, given how crucial this is to the overall strategy to transition to CCR assessments and the overall proposal. 6. Develop a public information plan to explain the drop in proficiency as a result of cut-score changes that puts the diminution in proficiency levels in context of past gains and "desire to raise the bar." 7. Consider reviewing models for project managing CCSS transition in use in other jurisdictions, including New York City, New York State, Arkansas, and Louisiana. 8. With regard to the instruction of English Learners and students with disabilities, develop the process through which LEAs are expected to plan for and implement changes to their curricula, instructional materials, instruction and assessments; how ISBE will assure LEA proficiency in these steps and in the use of tools being provided; and monitor the effectiveness of the transition. 9. Include specific instructional strategy and methodologies for general education teachers to support the teaching and learning of students with disabilities and English Learners in higher education's CCSS-focused realignment of teacher preparation curricula. 10. Develop a process to strengthen instruction of CCSS for English Learners and students with disabilities to ensure equitable access and achievement of those standards in general education settings.

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: 6 Yes, 0 No

Response Component	*Peer Panel Response*
Rationale	ISBE's 5-Star Multiple Measure System of differentiated recognition, accountability, and support meets this waiver criteria. The system is well-designed in terms of measurement as well as support. It is nicely balanced between status and growth measures and pays close attention to the performance of and closure of achievement gaps affecting sub-group members, including students with disabilities, English Learners and former English Learners. In so doing, the system constitutes a high-quality plan with strong inducements for learning growth, improved performance, rising graduation rates, and college readiness in ELA and math for all students and subgroups members. These inducements, the tiered system of support, and the information the system will provide educators and the public about categories of schools and districts where students are achieving more and less progress toward college and career readiness are likely to improve instruction, student achievement and school performance and close achievement gaps.

Strengths	1. Pilots multiple measures system at the end of current school year and puts it into full effect at end of the 2012-13 school year. 2. Nicely mixes achievement and growth-to-standard measures for elementary/middle schools, and those measures plus 4- and 5-year graduation rates for high schools; equally weights achievement and growth to determine star ratings for elementary/middle schools, and achievement, growth and graduation rates for high school (pp. 37-38, 44-45); and defines AMO and identifies reward and priority schools based on school and LEA progress towards reducing by half the number of non-proficient students (including subgroups members) over the next six years (pp. 40, 49-50). 3. Calculates star levels based on measures of growth, as well as achievement (and outcomes) and defines success as very strong success on one (> 90%) and decent success on the other (> 75%) (pp. 44-45). 4. Uses Value Table method of calculating growth (pp. 41-42), which has the advantage compared to regression models of being transparent to educators and parents, enabling them to more effectively diagnose and cure failure. 5. As of 2013, will substantially raise cut scores for measuring proficiency on its ELA and math tests to a level that aligns them with the state's PSAE high school assessment, which itself is pegged to the ACT and college readiness (pp. 30, 39). 6. Includes a measure of career- as well as college readiness in its high school ratings (WorkKeys/National Career Readiness) (p. 38) 7. Awards points to high schools for graduating students in 5 years, as well as 4; sets an ambitious but realistic target of 90% and 95% for 4- and 5-year graduates. 8. Improves incentives to focus on students most in need by: holding schools accountable to reduce achievement gaps on state assessments for all subgroups, including English Learners, former English Learners and students with disabilities, for schools with > 30 of them (n size reduced from 45); requiring schools with too few students in any sub-group to use a combined-group of all subgroups; reporting all outcomes by all subgroups (pp. 40-41, 43); measuring growth based in part on percent of English Learners reaching English Language Proficiency (pp. 42). 9. Includes "context" measures (learning environment survey of parents, teachers and students; college-ready high school course offerings), while limiting effect to "extra credit" for schools close to the next highest star level (pp. 42, 45). 10. Uses recognition, awards, public notification to all parents in lower-performing schools and districts, and a range of planning and improvement requirements for those same schools and districts to increase incentives for schools to move up the "star" ladder (pp. 45-46). 11. Uses Spotlight School and Educator Rewards to encourage high-performing LEAs, schools and teachers to network with poorer performing ones and to highlight link between high-performing teachers and schools (p.52).

Weaknesses, issues, lack of clarity	1. Informed the Panel in the telephone conference that ISBE has not yet decided how points will be awarded within the five star system across the Outcomes, Achievement, and Progress categories (see p.38, Att. p. 517), suggesting that unexpected difficulties may arise as the system's operation is simulated. 2. Premises two important pieces of the plan (EXPLORE-PLAN; Career Readiness Certificate) on new funding from legislature (pp. 32, 47). 3. Includes unexplained gap between the Four-Star and Three-Star level for schools and districts: 50 points is the top of 3-star range; 60 points is the bottom of 4-star range on growth and achievement (p. 44). 4. Leaves some members of sub-groups out of the incentive structure in schools where some, but not all, subgroups are below the n-size cut-off, rather than reducing n-size to 25 or 20 or creating a combined group for all sub-group members in subgroups that are too small (pp. 40-41). 5. Imposes no consequences for priority schools (outside priority districts) and focus schools that do not improve within a reasonable period of time.
Technical Assistance Suggestions	1. Develop a method for awarding points within the 5star system across the Outcomes, Achievement, and Progress categories, testing multiple options for calculating points and running simulations that engage stakeholders in the output to ensure validity and stakeholder acceptance. 2. Clarify contingency plan if funding is not forthcoming for EXPLORE-PLAN; National Career Readiness Certificate 3. Consider weighting 5-year graduation less than 4-year graduation. 4. Consider reducing the sub-group minimum to 25 or 20 or creating a combined group for all sub-group members in subgroups that are too small (pp. 40-41). 5. Consider simplifying definition of 2-Star schools. 6. Establish consequences (e.g., school closure; replacement of the leadership and teaching team) for priority and focus schools that do not improve within a reasonable number of years.

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: *4 Yes, 2 No*

Response Component	Peer Panel Response
Rationale	ISBE's multiple measures system provides a differentiated recognition, accountability, and support system that meets this waiver criteria. It bases rewards, consequences and support on a sensible mixture of student, subgroups and school performance (including graduation rates), growth and progress in ELA and math, creating strong inducements for improved performance and college readiness in ELA and math (as well as science) for all students and subgroups members.
Strengths	1. Mixes achievement (including graduation rate) and growth measures. 2. Uses the Value Table method of calculating growth to standard. 3. Will raise the cut scores for measuring proficiency on its ELA and math tests as of 2013. 4. Gives HS credit for graduating students in 5 years, as well as 4; sets ambitious graduation rate targets. 5. Includes a measure of career- as well as college- readiness in its high school ratings 6. Focuses attention on populations most in need by holding schools accountable for reducing achievement gaps on state assessments for all subgroups (including former English Learners); requiring schools with too few students in any one sub-group to use a combined group of all such students; and reporting all outcomes by all subgroups. 7. Calculates "star" levels based on mix of growth and achievement/graduation rates and defines success as very strong success on one (> 90%) and solid success on the other (> 75%). 8. Uses recognition, awards, public notification to all parents in lower-performing schools and districts, and a range of planning and improvement requirements for those schools and districts to increase incentives for schools to move up the "star" ladder (pp. 45-46). 9. To receive 'points' for a population within the Multiple Measures Index, schools must reach 95 percent tested.

Weaknesses, issues, lack of clarity	1. Informed Panel in the telephone conference that ISBE has not yet decided how points will be awarded within the 5-star system across the Outcomes, Achievement, and Progress categories (see p.38; Att. p. 517), suggesting that unexpected difficulties may arise as the system's operation is simulated. 2. Premises two important pieces of the plan (EXPLORE-PLAN; Career Readiness Certificate) on new funding from legislature (pp. 32, 47). 3. Includes unexplained gap between 4-Star and 3-Star level for schools and districts: 50 points is the top of 3-star range; 60 points is the bottom of 4-star range on growth and achievement (p. 44). 4. Leaves some members of sub-groups out of the incentive structure in schools where some, but not all, subgroups are below the n-size cut-off, rather than reducing n-size to 25 or 20 or creating a combined group for all sub-group members in subgroups that are too small (pp.40-41). 5. Imposes no consequences for priority schools (outside priority districts) and focus schools that do not improve within a reasonable period of time.
Technical Assistance Suggestions	1. Develop a method for awarding points within the 5-star system across the Outcomes, Achievement, and Progress categories, testing multiple options for calculating points and running simulations that engage stakeholders in the output to ensure validity and stakeholder acceptance. 2. Clarify contingency plan if funding is not forthcoming for EXPLORE-PLAN; National Career Readiness Certificate. 3. Consider weighting 5-year graduation less than 4-year graduation. 4. Consider reducing the sub-group minimum to 25 or 20 or creating a combined group for all sub-group members in subgroups that are too small (pp. 40-41). 5. Provide assistance to schools and LEAs to unpack the combined subgroup to identify the services the children in the group need. 6. Consider reporting (but not awarding 'points' for) outcomes for populations that did not reach the 95 percent threshold. 7. For transparency purposes, ensure that the Star system Reports for schools and LEAs clearly highlight the connection between classifications and specific percentages of students proficient and making growth.

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: 6 Yes, 0 No

Response Component	*Peer Panel Response*
Rationale	The inclusion of specific measures of, and targets for closing, the achievement gap for relevant subgroups, and the extension of that protection to students in subgroups with too few members at a school or district to have been counted previously and also to a new subgroup of former English Learners, provide ample reason to expect that the Multiple Measures system will be effective in closing achievement gaps.
Strengths	1. Focus attention on populations most in need by holding schools accountable for reducing achievement gaps on state assessments for all subgroups, including English Learners, former English Learners and students with disabilities, for schools that have those groups (n-size >30 required, reduced from 45) 2. Requires schools with too few students in any one sub-group to use a combined group of all members of those subgroups; reports all outcomes by all subgroups (pp. 40-41, 43) 3. Uses Statewide System of Support (SSOS) to provide support services for English Learners and students with disabilities. 4. Organizes a tiered system of support for schools and LEAs (including an additional category of "high-priority" LEAs) under the umbrella of "the Center"; delivers supports to LEAs through dedicated district assistance and rapid response teams; assures that school districts will select a lead partner for interventions in SIG-funded schools or, if that does not happen, the Center will make the selection for the school district.
Weaknesses, issues, lack of clarity	1. Leaves some members of sub-groups out of the incentive structure in schools where some, but not all, subgroups are below the n-size cut-off, rather than reducing n-size to 25 or 20 or creating a combined group for all sub-group members in subgroups that are too small (pp. 40-41). 2. Lacks detail about timeline and implementation strategy for the Center, the restructuring of the SSOS, and how ISBE plans to coordinate the actions of the Center, the District Accountability and Oversight Unit, the District Assistance Teams, the Rapid Response Teams, and the overall regional delivery system.
Technical Assistance Suggestions	1. Consider reducing the sub-group minimum to 25 or even 20 or creating a combined group for all sub-group members in subgroups that are too small (pp. 40-41). 2. Develop detailed timeline and implementation strategy for the Center, the restructuring of the SSOS, and how ISBE plans to coordinate the actions of the Center, the District Accountability and Oversight Unit, the District Assistance Teams, the Rapid Response Teams, and the overall the regional delivery 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: 4 Yes, 2 No

Response Component	Peer Panel Response
Rationale	The EXPLORE-PLAN-ACT progression for measuring high school progress and the ACCESS assessment (especially once updated via ASSETS) of English Learners progress towards English language proficiency should enhance, not dilute, the capacity of the Multiple Measures system to ensure that all students achieve college and career ready standards. However, given the SEA's more extended timeline (discussed on the conference call) for revising science cut scores and the current equal weighting of the science assessments in the Multiple Measures index, the inclusion of science scores may undermine the system's capacity to ensure that all students achieve the State's college- and career-ready standards.
Strengths	1. Documents a decline in focus on science and STEM generally due to the focus the prior accountability system placed on only ELA and math, to the detriment of students' ability to succeed in college, which may be moderated by giving equal weight to rigorous science assessments, while still leaving substantial weight in the accountability system for other core college-ready subjects (p.48). 2. Demonstrates that the 8th through 10th grade EXPLORE and PLAN assessments have lower proficiency rates for math, reading and science than the PSAE for 11th graders and the 3-8 assessments for math and ELA – indicating that using these measures of growth will create incentives to improve student outcomes in core subjects without diluting the differentiated accountability system (p.48). 3. Progress towards English Language Proficiency is important to English Learners' college and career readiness, and measuring that progress is sensible and likely to increase the progress of English Learners to college and career readiness.
Weaknesses, issues, lack of clarity	1. Equally weighting proficiency rates on science assessments using preexisting cut scores with ELA and math assessments on which proficiency cut scores have been substantially raised to make them college ready may jeopardize the rigor of the Multiple Measures system.

Technical Assistance Suggestions	1. Give science assessments less weight than ELA and math, or consider omitting science assessment proficiency rates until new cut scores are established.

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: X Yes, X No

Response Component	Peer Panel Response
Rationale	
Strengths	•
Weaknesses, issues, lack of clarity	•

Technical Assistance Suggestions	•

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

Tally of Peer Responses:

Response Component	Peer Panel Response
Rationale	ISBE described its methodology for identifying reward schools. Because there is no demonstration that the Spotlight and Academic Excellence awards will be reserved for schools that meet Illinois's new performance AMOs for all students and subgroup members, ISBE's methodology for identifying reward schools does not satisfy this criterion. Aside from that problem, ISBE's description of the methodology used to identify reward schools satisfies this criterion.
Strengths	Confers reward status based on a mixture of school rankings on the Star system (in the case of two of the three awards); high rates of progress (large year-to-year gains in proficiency in ELA, math or science, or in graduation rates, for all and sub-group students in schools with challenging populations); and large two-year achievement-gap reduction – all of which are outcomes the State justifiably wants to induce schools to strive for.
Weaknesses, issues, lack of clarity	Does not demonstrate that all Spotlight and Academic Excellence Award schools will have met the State's proficiency AMOs for all students and subgroups.

Technical Assistance Suggestions	Demonstrate that only schools that meet the SEA's new performance AMOs for all students and subgroup members will receive Spotlight and Academic Excellence awards, or revise the criteria for receiving those awards.

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

Response Component	Peer Panel Response
Rationale	ISBE has developed a reward structure that will likely be perceived as meaningful to schools by virtue of public recognition and recognition among peers as a source of best practices.
Strengths	1. Held 29 stakeholder meetings, attended by nearly 1700 people (p. 10), providing ample opportunity for LEAs and schools to provide input on the reward system (p.9; Attachment 2/1). 2. Confers reward status based on a mixture of school rankings on the Star system (in the case of two of the three awards); high rates of progress (large year-to-year gains in proficiency in ELA, math or science, or in graduation rates, for all and sub-group students in schools with challenging populations); and large two-year achievement-gap reduction – all of which are outcomes the State justifiably wants to induce schools to strive for. 3. Uses recognition, awards, public notification to all parents in less-well-performing schools and districts, and a range of planning and improvement requirements for those same schools and districts to create incentives for schools to move up the "star" ladder to 5-star and reward status (pp. 45-46). 4. Uses Honor Roll, Spotlight School and Spotlight Educator reward structure and federally funded Promising Practice grants to encourage high-performing schools and districts to join improvement support networks with lower-performing ones. 5. Uses that same reward structure to highlight the relationship between teachers and schools with strong outcomes (p.52.) 6. Aligns criteria for National Title I Distinguished Schools program with SEA's new classification system (p.53).
Weaknesses, issues, lack of clarity	1. Does not present evidence of stakeholder consultation regarding need for changes in existing system of rewards and recognition. 2. With one exception (Promising Practice grants tied to a subset (Honor Roll schools) of one of its categories of reward schools (Spotlight Schools)), does not provide "tangible" rewards such as bonuses, grants, increased autonomy, etc.. 3. Does not link Spotlight Awards to schools' 5-star status, modestly diluting the power of the 5-star system (p.51). 4. Given that neither growth to standard nor ACT scores are considered for Spotlight Awards and Academic Excellence Awards, it appears that a school could have low growth and low ACT scores, and still receive an award.

Technical Assistance Suggestions	1. Consider running a simulation to see how often reward, focus and priority schools end up being ones that are not where those designations would suggest in terms of the 5-star system, and whether there are adjustments to the definitions of those three types of schools (or to the 5-star system) that could create greater congruence – for example, by giving additional weight to schools' star rating. 2. Consider adding tangible rewards, including giving reward schools greater autonomy from state rules and regulations. 3. Consider using a higher threshold for "percent low income" for Spotlight awards. 4. Consider requiring impressive outcomes in reading <u>and</u> mathematics <u>and</u> science, instead of basing rewards on impressive outcomes in only <u>or</u> the other of those subjects.

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: 1 Yes, 5 No

Response Component	Peer Panel Response
Rationale	Although conscientious, ISBE's proposed interventions in priority schools are not fully specified, are at times subordinate to ISBE's plans for turning around "High-Priority <u>Districts</u>", and are not fully consistent with the turnaround principles in ways that could keep the interventions from having the dramatic effect that is required to satisfy this principle. Concerns include a failure to expeditiously remove principals who are not capable of leading turnaround efforts, to give turnaround principals sufficient say in turnaround plans, and to remove ineffective teachers.
Strengths	1. Conducts comprehensive diagnostic evaluation of priority school, using protocols reflected in Statewide System of Support (SSOS) Operations Manual (pp.57-58; Attachment 18). 2. Requires development of comprehensive whole-school reform plan (p.58) that (a) aligns to curriculum, instruction, and assessment to CCSS; (b) improves discipline programs; (c) focuses on professional development and parent engagement; (d) implements teacher and principal evaluation system that includes indicators of student growth; (e) strives to provide teachers with the collaboration/planning time and professional development needed to succeed; (f) includes strategies for increasing learning time on core subjects by lengthening the day, week or year; and (g) commits to give the principal charged with revitalizing the school operational flexibility in the areas of scheduling, staff, curriculum and budget (pp. 58-59, 64). 3. Brings in an external "lead partner" vetted by the state (for SIG-funded schools) or a 3-person rapid-response team from The Center (for other schools) to help guide the turnaround (p.59). 4. Proposes system (partly dependent upon legislative changes not yet in place, pp.62-63) for intervening in, creating a new leadership structure for, and developing strong plans to improve chronically underperforming school <u>districts</u>; aligns work of external partner assigned to priority schools by giving the same partner responsibility for guiding district transformation (pp.59-64). 5. Timeline refers to "ISBE monitoring through division of Innovation and Improvement" (p.65). 6. Requires LEAs with 1-, 2- and 3-Star schools to retain up to 20% of Title I basic funds to address deficiencies in schools identified as such (pp.46-47, 79-80), which will include priority schools.

Weaknesses, issues, lack of clarity	1. Lacks detail about timeline and implementation strategy for the Center, the restructuring of the SSOS, and how ISBE plans to coordinate the actions of the Center, the District Accountability and Oversight Unit, the District Assistance Teams, the Rapid Response Teams, and the overall regional delivery system.
	 2. Lacks clarity as to the order in which a transformation plan will be developed and a decision will be made about whether to change the leadership of the school, and might require a new principal to implement a plan developed by others.
	 3. Uses criteria for deciding whether to retain or replace the principal of priority schools ("effective leadership"; "track record [of] improving achievement" (p.62)) that fail to consider the important additional question whether the principal has the capacity to lead a turnaround effort.
	 4. Lacks clarity in the timeline on p. 65, as between events occurring in 2011-12 and 2012-13.
	 5. Lacks an explanation for back-loading 83 schools into 2013-14 (possibly in relation to the restructuring of the SSOS?).
	 6. Devotes less attention to describing efforts to turnaround priority <u>schools</u> (which are directly responsive to criterion 2.D.iii) (pp.59-60) than to efforts to turn around chronically failing <u>districts</u> (pp.59-64).
	   a. Doesn't indicate the proportion of priority <u>schools</u> located in high-priority <u>districts</u>, leaving the possibility that the considerable effort ISBE puts into high-priority districts will not be responsive to the needs of priority schools in non-priority districts.
	   b. Contemplates an impressive degree of dramatic and systemic change for priority <u>districts</u> that is not reflected in the degree of change contemplated for priority <u>schools</u> (pp. 61-62).
	 7. Does not explain how ISBE or LEAs will determine that (a) teachers in priority schools at the time the intervention begins are (i) able to improve instruction and have an ability to be successful in the turnaround context, and (b) what steps will be taken to remove ineffective teachers currently in the building, assure that ineffective teachers do not transfer in, and attract effective teachers to the neediest schools.
	 8. Includes no provision for assisting educators in the building to use data collaboratively to inform instruction and improvement
	 9. Does not identify specific strategies or professional development for teachers with English Learners and/or students with disabilities in their classes, including general-education classes.
	 10. Does not describe contemplated ISBE monitoring through the Division of Innovation and Improvement (p. 65).
	 11. Does not state that ISBE will hold The Center, DAO, regional offices, external partners accountable for their track record of improving priority schools.
	 12. Fails to identify consequences (e.g., school closure; replacement of the leadership and teaching team) for priority and focus schools that do not improve within a reasonable number of years, apart from priority schools in priority districts (p.59).

Technical Assistance Suggestions	1. Consider using the degree of dramatic and systematic change contemplated for turning around priority <u>districts</u> as a model for <u>school</u> turnaround design: make the <u>school</u>-turnaround strategy as rigorous, evidence-based and "game-changing" as efforts describe to turnaround school <u>districts</u> (60-64). 2. Develop a detailed timeline and implementation strategy for the Center, the restructuring of the SSOS, and how ISBE plans to coordinate the actions of the Center, the District Accountability and Oversight Unit, the District Assistance Teams, the Rapid Response Teams, and the overall regional delivery system 3. Reconsider the relationship between ISBE's focus on high-priority districts and the steps it will take to turnaround priority schools: (a) provide data on proportion of priority schools that are located in high-priority school districts, and (b) assure that priority schools located in other non-high-priority districts will go through a similarly dramatic and systematic change process. 4. Add criteria for deciding whether to retain or replace the principal of priority schools based on capacity to lead a turnaround effort. 5. Require steps that (a) immediately, at the point when intervention begins, determine whether teachers in the priority school are (i) able to improve instruction and (ii) have the ability to be successful in the turnaround effort, and (b) protect the school from ineffective teachers transferring in. 6. Include steps to assist educators to use data collaboratively to inform instruction. 7. Consider rearranging turnaround process so that the decision whether to retain or replace the principal is made earlier enough so that the turnaround principal can collaborate in developing the transition plan that he or she will be charged with implementing. 8. Consider holding DAO, Center, regional office, external partner and state staff accountable for their track-record of improvement perhaps using same standards as for removing schools/districts from priority status. 9. Identify consequences (e.g., school closure; replacement of the leadership and teaching team) for priority and focus schools that do not improve within a reasonable number of years. 10. Use educator effectiveness evaluation data to assist in making personnel decisions.

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

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Tally of Peer Responses: 1 Yes, 5 No

Response Component	Peer Panel Response
Rationale	The proposed interventions will likely bring about incremental improvements in the effectiveness of school leadership, the quality of the teacher teams and instructional quality, but in the absence of the dramatic and systematic change contemplated by principal 2.D.iii.a above, are not likely to substantially improve student achievement and graduation rates for all students, particularly English Learners and students with disabilities, and the lowest-achieving students. While the approach to low-performing schools in priority districts and to priority districts generally is strong, the approach in non-priority districts should be strengthened.
Strengths	Same strengths as in 2.D.iii.a. above
Weaknesses, issues, lack of clarity	Same weaknesses, issues, lack of clarity as in 2.D.iii.a. above
Technical Assistance Suggestions	Same suggestions as in 2.D.iii.a. above

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

Response Component	Peer Panel Response
Rationale	The SEAs proposed timeline ensures that the priority schools will implement the contemplated interventions in each priority school no later than 2014-15.
Strengths	None.
Weaknesses, issues, lack of clarity	1. Lacks clarity in the Timeline on p. 65, as between 2011-12 and 2012-13. 2. Lacks an explanation for back-loading 83 schools into 2013-14 (possibly in relation to the restructuring of the SSOS?)
Technical Assistance Suggestions	None.

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

    a. Do the SEA's criteria ensure that schools that exit priority status have made significant progress in improving student achievement?

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

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

Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	The improvements required before a school exits priority status ensure that schools that exit priority status have made significant progress in improving student achievement, and ISBE plans thereafter to provide support through its rapid-response teams for two additional years to assure that success continues.
Strengths	1. Premises exit from priority status on meeting demanding achievement and outcome targets for two consecutive years and requires that a school no longer fall in bottom 5 percent of state (pp. 65-66). 2. Also requires that SIG grant period have ended for schools receiving that grant (p. 65).
Weaknesses, issues, lack of clarity	1. The criteria for identifying priority schools and exiting priority status are not tied back to the five-star classification system.
Technical Assistance Suggestions	1. Consider requiring schools to have three stars before existing priority status.

2.E Focus Schools

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

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

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

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

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

Response Component	Peer Panel Response
Rationale	ISBE's criteria for identifying focus schools meet the waiver criteria. ISBE uses the ESEA Flexibility definition of Focus Schools and concludes that doing so will identify at least 10 percent of its Title I schools as low performing. The Panel is concerned, however, that the SEA's methodology for identifying focus schools may not identify schools where subgroup members face the largest achievement gaps with other students statewide.
Strengths	ISBE uses the ESEA Flexibility definition of Focus Schools and concludes that doing so will identify at least 10 percent of its Title I schools as low performing.
Weaknesses, issues, lack of clarity	1. Uses method for identifying focus schools that is disconnected from and could dilute the impact of the broader star system. 2. Uses method for identifying focus schools that may not serve its purpose when applied to schools with very high proportions of students in subgroups that face the largest achievement gaps statewide.

Technical Assistance Suggestions	1. Consider additional methodologies for identifying achievement and growth gaps, including, for example, by relying on the <u>greater</u> of the within-school gap and the school-to-state gap. 2. Consider introducing normative growth measures to diagnose differences in schools with high achievement gaps, specifically to distinguish between schools with large achievement gaps but high disaggregated growth rates from schools with low disaggregated growth rates, both of which may have the same low growth to standard.

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

Response Component	Peer Panel Response
Rationale	Given that ISBE will not begin implementation in most focus schools until 2013-14, it does not satisfy this criterion. Additionally, although ISBE is enhancing the coordination of its support for struggling districts and schools via The Center and new two-person District Assistance Teams, and has chosen a continuous improvement strategy (Rising Stars/Wise Way) designed to apply flexibly to all school levels and school needs, the intervention strategy is not specifically designed for the types of populations that lead to a school's designation as a focus school. The application and relevant attachment do not discuss findings demonstrating the effectiveness of the chosen strategy for the relevant population or provide examples of how the intervention actually works.
Strengths	1. Plans to bring a variety of previously siloed services to struggling districts and schools, including for students with disabilities, English Learners and minority students, into a single suite of services managed by The Center, supported by regional centers, and implemented by two-person District Assistance Teams (one district leadership coach; one district gap specialist) who work with LEA and school leadership teams to foster improvement in focus schools (pp.28-29, 54-55, 68-69, 77, 81). 2. Describes the approach to be taken (based on Sprency (2005) (pp. 68, 70-71) and the Rising Stars continuous improvement tool on which the Statewide System of Support Operation Manual is based (Attachment 18), which aims to "increase[ ] the capacity of the intervening body (The Center?) and strengthen[ ] the leadership in the school district and the school." (p. 68) 3. Requires LEAs with 1-, 2- and 3-Star schools to retain up to 20% of Title I basic funds to address deficiencies in schools identified as such (pp. 46-47, 79-80), which will include priority schools.
Weaknesses, issues, lack of clarity	1. Plans to conduct a diagnostic and planning exercise during all of 2012-13, which pushes back the implementation of interventions until the following year and does not meet the Flexibility requirement that implementation itself begin in 2012-13 (p.67). 2. Adopts a diagnostic method (Rising Stars) that appears to be a sensible qualitative review method but is not shown to be useful for targeting interventions to close achievement gaps; does not clearly identify specific research-based interventions for closing achievement gaps, or the process for identifying those interventions (pp.71-74). 3. Provides one two-person District Assistant Team per district, without differentiation by number of students or focus schools in a district; unclear how this would work for a large district like Chicago or how much assistance any team this small and focused on the district will provide to focus schools themselves (p.69). 4. Operations Manual focuses on so many standards at once (100 or so separate school standards, it appears) that it may not allow targeted and effective improvements in student performance among the relevant subpopulations (see p.74, noting that the three examples given are "only a sliver" of the whole; Attachment 18).

Technical Assistance Suggestions	1. Consider the usefulness of the Rising Stars diagnostic method for targeting interventions to close achievement gaps and identify either specific research-based interventions for closing gaps that will be used or a process for identifying those interventions. 2. Focus the intervention on a small number of key school characteristics (only two or three in each of the eight areas listed in the Operations Manual, e.g., the ones given as examples at pp.73-74). 3. Explain how two-person DATs will be able to support focus schools, especially in districts with multiple focus schools.

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: 1 Yes, 5 No

Response Component	Peer Panel Response
Rationale	ISBE's exit criteria for focus schools do not indicate whether significant improvement in gap closing will be required for exit or determine whether indicators of progress specified in improvement plans have been satisfied.
Strengths	None.
Weaknesses, issues, lack of clarity	1. Uses a "risen above the measurement" exit standard (p.74) that is ambiguous and leaves the possibility that a school will be allowed to exit, without having made significant improvements, because it is no longer in the bottom ten percent of schools given increasing within-school gaps in other schools. 2. Fails to tie the criteria for identifying focus schools and exiting focus status back to, and thus dilutes the power of, the five-star classification system. 3. Fails to specify consequences for focus schools that do not exit focus status in a timely manner.
Technical Assistance Suggestions	1. Consider, in addition to relying on schools not being in the bottom 10 percent of in-school gaps, require exiting schools to have closed the gap by some defined and appreciable amount. 2. Consider requiring that schools achieve at least 3-stars before being permitted to exit focus status. 3. Specify the consequences for schools that do not exit focus status in a timely manner.

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

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

2.F.i Panel Response

Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	ISBE's Multiple Measures Index, 5-Star rating system, and new AMOs satisfy this principle by creating solid incentives for all Title I schools to improve their rating in ways that can occur only if they improve the performance and longitudinal growth of their students, with particular focus on sub-groups and closing achievement gaps. The Panel would have even more confidence in the system if ISBE more clearly described how it intends to monitor improvement in struggling schools, particularly in districts that are not themselves distressed and if it enhanced the alignment between its definition of success under the 5-star system and its definition of reward, focus and priority schools.
Strengths	1. Uses Multiple Measures Index to differentiate school into 5 "Star" categories based on a combination of achievement, growth, and graduation rates for all students and for relevant subgroups, and uses a tiered set of rewards, consequences, and supports to create incentive for schools to move up the "star" ladder in ways that can occur only if their students, particularly their less well-performing students, improve. 2. Uses school and district rankings, notification of parents that their schools or districts are not performing in the highest categories, and a tiered set of required improvement steps to provide incentives for schools in the middle-ranges – i.e., that do not qualify for reward, focus or priority status – to move up the "star" ladder based on evidence of improved student learning and gap closure (p.79). 3. Creates parallel incentives for LEAs to move up the ladder by helping their schools to do improve achievement and growth and close achievement gaps (p.79). 4. Plans to make a variety of previously siloed services available to struggling districts and schools (including EL and students with disabilities services), into a single suite of supports managed by The Center, supported by regional centers, and implemented by two-person District Assistance Teams (pp. 28-29, 54-55, 68-69, 77, 81). 5. Requires improvement planning for 3-, 2- and 1-Star schools, beginning with a diagnostic by an external team hired by the state for 2- and 1-Star schools and a self-audit by 3-Star schools (p.78). 6. Requires the same schools to engage in the Rising Stars continuous improvement process, with support on an as-requested basis from the SSOS and The Center for 4- and 3-star schools and on a state-directed basis via District Assistance Teams or rapid response teams for 2- and 1-Star schools (p.78)

Weaknesses, issues, lack of clarity	1. Lacks detail about timeline and implementation strategy for the Center, the restructuring of the SSOS, and how ISBE plans to coordinate the actions of the Center, the District Accountability and Oversight Unit, the District Assistance Teams, the Rapid Response Teams, and the overall regional delivery system (see pp. 78-80). 2. Lacks clarity on how the ISBE and its District Accountability and Oversight unit (see p.78) plan to monitor the effectiveness of improvement efforts, particularly in districts that are not themselves distressed. 3. Misses opportunities to align the criteria that drive its Multiple Measures system, including longitudinal student growth, with its definitions of reward, status schools priority in ways that could use the logic of the 5-Star index to create additional incentives to achieve reward status and avoid and focus status. 4. In regard to students with disabilities and English Learners, provides little detail (pp. 78-80) on support activities and responsibilities of ISBE, The Center, District Assistance teams, LEA and 1-, 2-, 3-, and 4-Star schools.
Technical Assistance Suggestions	1. Provide more detail and clarity on actions and responsibilities of ISBE (including The Center and District Assistance teams), LEA and 1-, 2-, 3-, and 4-Star schools in terms of the support system: Will Center/DAT personnel actually support schools or support LEA only or mainly? If the latter, how will the LEAs deliver support to the schools and how will SEA monitor? 2. Consider running a simulation to see how often reward, focus and priority schools fall outside where the 5-star rating designations would suggest, and whether there are adjustments to the definitions of those three types of schools (or to the 5-star system) that could create greater congruence – for example, by giving additional weight to schools' star rating. 3. Clarify the services for students with disabilities and English Learners that are brought together in the Center and how they are delivered to LEAs and schools.

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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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	For the reasons, and with the qualifications, given in 2.F.i. above, the incentives created by the Multiple Measures Index and 5-Star rating system are likely to improve instructional quality and outcomes for all students, including English Learners and students with disabilities, who are main focus of the gap-closing features of the measurement system. The effort to coordinate previously siloed services to schools, including in particular, those serving English Learners and students with disabilities, into a single support model running through the Center and its District Assistance and rapid-response teams to LEAs and schools should improve the quality of those services to the benefit of all students, including students with disabilities and English Learners. More clarity and detail on the services for students with disabilities and English Learners that are brought together in the Center and how they are to be delivered to LEAs and schools would create even greater confidence.
Strengths	Same strengths as in 2.F.i. above
Weaknesses, issues, lack of clarity	Same weaknesses, issues, etc. as in 2.F.i. above

Technical Assistance Suggestions	Same suggestions as in 2.F.i. above

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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	ISBE rolls up its Multiple Measures/5-Star differentiated accountability system into a parallel accountability system for LEAs, and ties a parallel system of supports to it. This includes a set of interventions for "high-priority districts" (pp. 59-63, 79-80) that is more highly developed and more likely to lead to dramatic and systematic change for those districts than the parallel processes for priority schools are for those schools. Indeed, the "high-priority district" interventions could serve as a model for enhancing the turnaround strategy for priority schools. As is discussed above, much of the Statewide System of Support, the services to be coordinated by The Center, the District Assistant and rapid response teams, and the Rising Stars intervention methodology are aimed more directly and powerfully at districts than at schools, including services for English Learners and students with disabilities (p.81). These LEA-focused steps cannot substitute for the required schools-focused incentives and supports. But they are likely to build considerable LEA capacity with a particular focus on low-achieving schools and schools with the largest achievement gaps.
Strengths	1. Holds districts accountable in parallel fashion to schools based on a roll up of school achievement, growth and graduate rate measures. 2. Attaches rewards and consequences (pp.79-80), including a version of state take over that is likely to lead to dramatic and systematic change (pp.59-63). 3. Effectively coordinates available services for LEAs effectively via the Statewide System of Support, The Center, and (for lower performing districts) District Assistance and rapid-response teams.
Weaknesses, issues, lack of clarity	1. Lacks clarity as to how intervention teams with the same number of members in each case (2 or 3 for DATs and rapid response teams), will align to the number of students and struggling schools in different districts. 2. Appears to focus the Rising Stars intervention for districts (Attachment 18) on more criteria and standards at once than is optimal to lead to focused reform. 3. Doesn't specify criteria for assuring quality of external providers, including research-based practices and track record in similar schools. 4. Doesn't specify mechanism for holding the Center and other central and regional support staff accountable for the effectiveness of their interventions in improving the star-rating of supported schools, nor is there an evaluation plan for the overall effectiveness of the Center.

Technical Assistance Suggestions	1. Clarify how interventions and teams, which appear to have the same number of participants in each case (2 or 3 for DATs and rapid response teams), are aligned to number of students and struggling schools in different districts. 2. Focus the Rising Stars intervention for districts (Attachment 18) on fewer, deeper criteria and standards. 3. Specify criteria for assuring quality of external providers, including research-based practices and track record in similar schools. 4. Specify mechanism for holding the Center and other support staff accountable for the effectiveness of interventions in improving the star-rating of supported schools, and develop an evaluation plan for the overall effectiveness of the Center. 5. Ensure that the RFP for the Center requests a clear statement of ISBE's expectation for how the Center will coordinate all elements of the SSOS.

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: 3 Yes, 3 No

| *Response Component* | *Peer Panel Response* |

Rationale   The Panel concluded that ISBE satisfied some of the criteria, but not all. ISBE's plan for developing and implementing a system of differentiated recognition, accountability, and support has potential (1) to improve student achievement, close achievement gaps, and improve the quality of instruction for students and (2) 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. In particular, Panel members were impressed by ISBE's Multiple Measures Index, 5-Star rating system, its tiered system of support services under the umbrella of the newly created Center and delivered to LEAs through dedicated district assistance and rapid response teams, and the Rising Stars continuous improvement methodology (apart from its application to focus schools without further evidence of its appropriateness for that context). Panel members were concerned about other aspects of the plan, however, including some aspects that keep ISBE's plan from fully satisfying the criteria required by this overall principle in the view of some Panel members. These concerns are collected in the weaknesses section below and include:

- the extent of the discrepancy between the powerful logic of the 5-star, Multiple Measures accountability system and the method of identifying reward, focus and priority schools and permitting exit from the latter two statuses;
- the equal weighting of science assessments in advance of resetting cut scores or aligning them to college ready standards;
- interventions for priority schools that are not
    i. sufficiently well-described,
    ii. sufficiently intent upon identifying ineffective school leaders and teachers who are not are up to the turnaround task, and
    iii. reinforced by strong enough consequences for priority and focus schools that fail to improve in a reasonable timeframe;
- timeline for establishing the Center; coordination of actions among Center, central ISBE, regional and LEA responsibilities for school improvement; delivery of services focused on English Learners and students with disabilities; and how ISBE will hold these actors accountable for how successfully achievement increases and achievement gaps close in priority, focus and other schools in need;
- the 2013-14 timeline for the onset of interventions for focus schools and the criteria for exiting focus status;
- the method of defining Spotlight and Academic Excellence Awards; and
- uncertainty as to how the <u>district</u>-focused nature of many of the supports will align to the needs of, and reach, failing <u>schools</u>.

Strengths

1. Multiple Measures Index
2. 5-Star rating system
3. Tiered system of support services under the umbrella of The Center and delivered to LEAs through dedicated District Assistance and rapid response teams
4. Achievement and progress-focused AMOs for all and subgroup students
5. Rising Stars continuous improvement methodology as applied to Title I schools generally (if less demonstrably so for focus schools)
6. Extension of incentives to improve student achievement and gap-closure across the full spectrum of Title I schools.

Weaknesses, issues, lack of clarity

1. Informed Panel in the telephone conference that ISBE has not yet decided how points will be awarded within the five star system across the Outcomes, Achievement, and Progress categories (see p.38; Att. p. 517), suggesting that unexpected difficulties may arise as the system's operation is simulated.
2. Premises two important pieces of the plan (EXPLORE-PLAN; Career Readiness Certificate) on new funding from legislature (pp.32, 47).
3. Imposes no consequences for priority schools (outside priority districts) and focus schools that do not improve within a reasonable period of time.
4. Equally weighting proficiency rates on science assessments using preexisting cut scores with ELA and math assessments on which proficiency cut scores have been substantially raised to make them college ready may jeopardize the rigor of the Multiple Measures system.
5. Does not demonstrate that all Spotlight and Academic Excellence Award schools will have met the State's proficiency AMOs for all students and subgroups.
6. Lacks detail about timeline and implementation strategy for the Center, the restructuring of the SSOS, and how ISBE plans to coordinate the actions of the Center, the District Accountability and Oversight Unit, the District Assistance Teams, the Rapid Response Teams, and the overall regional delivery system
7. Uses criteria for deciding whether to retain or replace the principal of priority schools ("effective leadership"; "track record [of] improving achievement" (p.62)) that fail to consider the important additional question whether the principal has the capacity to lead a turnaround effort.
8. Devotes less attention to describing efforts to turnaround priority schools (which are directly responsive to criterion 2.D.iii) (pp.59-60) than to efforts to turn around chronically failing districts (pp.59-64).
9. Does not explain how ISBE or LEAs will determine that (a) teachers in priority schools at the time the intervention begins are (i) able to improve instruction and have an ability to be successful in the turnaround context, and (b) what steps will be taken to remove ineffective teachers currently in the building, assure that ineffective teachers do not transfer in, and attract effective teachers to the neediest schools.
10. Does not identify specific strategies or professional development for teachers with English Learners and/or students with disabilities in their classes, including general-education classes.
11. Does not state that ISBE will hold The Center, DAO, regional offices, external partners accountable for their track record of improving priority, focus and other Title I schools.
12. Plans to conduct a diagnostic and planning exercise for focus schools during all of 2012-13, which pushes back the implementation of interventions until the following year and does not meet the Flexibility requirement that implementation itself begin in 2012-13 (p.67).
13. Adopts a diagnostic method (Rising Stars) for focus schools that appears to be a sensible qualitative review method but is not shown

to be useful for targeting interventions to close achievement gaps; does not clearly identify specific research-based interventions for closing achievement gaps, or the process for identifying those interventions. (pp.71-74).

14. Uses a "risen above the measurement" exit standard for focus schools (p.74) that is ambiguous and leaves the possibility that a school will be allowed to exit, without having made significant improvements, because it is no longer in the bottom ten percent of schools given increasing within-school gaps in other schools.

15. Fails to tie the criteria for identifying reward schools and for identifying priority and focus schools and exiting priority and focus status back to, and thus dilutes the power of, the five-star classification system.

| *Technical Assistance Suggestions* | See suggestions throughout Part 2. |

Principle 3: Supporting Effective Instruction and Leadership

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

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

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

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

3.A.i, Option A.i Panel Response
☒ *Not applicable because the SEA selected 3.A, Option B*
Tally of Peer Responses: X Yes, X No

Response Component		Peer Panel Response
Rationale		
Strengths		
Weaknesses, issues, lack of clarity		
Technical Assistance Suggestions		

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

3.A.i, Option A.ii Panel Response
☒ *Not applicable because the SEA selected 3.A, Option B*
Tally of Peer Responses: X Yes, X No

Response Component		Peer Panel Response
Rationale		
Strengths		
Weaknesses, issues, lack of clarity		
Technical Assistance Suggestions		

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

<u>If the SEA selected **Option B**</u>:
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: 0 *Yes, 6 No*

Response Component	Peer Panel Response
Rationale	ISBE's guidelines are not likely to lead to the development of evaluation and support systems that increase the quality of instruction for students and improve student achievement.
Strengths	1. LEAs are required to include multiple measures of professional practice in their educator evaluation systems including formal and informal observations, evidence of teacher planning, instructional delivery and classroom management skills. 2. ISBE recognizes the importance of accessing technical experts and practitioners to provide guidance on several areas around the validity of assessments including the appropriate use of the assessments, including for instructional, evaluative, predictive or multiple purposes, the demonstrated technical quality of assessments, including item quality, and the appropriate method for assessing English Learners and students with disabilities. 3. ISBE has a plan for training evaluators to use a qualitative rubric to assess classroom instruction. The SEA proposes to: 1. Establish a prequalification program aligned to the SEA's performance evaluation system. This process must include a process to ensure that evaluators' ratings align to the requirements of the system. 2. Build out a comprehensive technical assistance system that supports school districts with the development and implementation of teacher and principal evaluation systems. 3. Provide Web-based systems and tools that support the implementation of the SEA's performance evaluation models. 4. Develop a train-the-trainer program that includes the development and the delivery of content specific to the evaluator prequalification program, the evaluator retraining program, the technical assistance system and the Web-based system and tools.

Weaknesses, issues, lack of clarity	1. ISBE has not presented a principal evaluation plan including its design, implementation and most importantly how it will be used to ensure principal effectiveness. 2. ISBE will not be able to ensure that LEAs' educator evaluation systems provide continuous improvement of instruction for all teachers given that ISBE neither requires LEAs to submit their educator evaluation plans for review nor does ISBE intend to monitor the quality of the LEA's implementation of its plan. 3. ISBE will not be able to ensure that LEAs' educator evaluation systems meaningfully differentiate performance at four levels given that ISBE neither requires LEAs to submit their educator evaluation plans for review nor does ISBE intend to monitor the quality of the LEA's implementation of its plan. 4. ISBE will not be able to ensure that LEAs' educator evaluation systems use valid measures given that ISBE neither requires LEAs to submit their educator evaluation plans for review nor does ISBE intend to monitor the quality of the LEA's implementation of its plan. 5. According to the Addendum, school districts except Chicago are prohibited from using state assessment data for teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects.

Technical Assistance Suggestions	1. Create a plan for principal evaluation including its design, implementation and most importantly how it will be used to ensure principal effectiveness. 2. Revise the proposed regulations to require submission of LEA educator evaluation plans to ISBE for review and approval. 3. Create a plan to ensure the quality of the LEA's implementation of its educator evaluation system. 4. Revise the proposed regulations to require the inclusion of ISAT and PSAE for reading/ELA and math as one of the assessments for measuring student growth for teacher evaluations. In addition, revise the proposed regulations to require submission of LEA educator evaluation plans to ISBE for review and approval. 5. The state should adopt a statewide growth model used by all LEAs using the statewide assessments.

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

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

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

☐ *Not applicable because the SEA selected 3.A, Option A*
Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	ISBE had sufficient involvement of educators in the development of these guidelines.
Strengths	1. Inclusion of practitioners on the PEAC, PEAC forums 2. Under the Consultation section in the application, ISBE provides several examples of how practitioners were included in the development of the guidelines and actual example of how that involvement influenced decisions. For example, ISBE reports that more than 2,300 educators offered their views which led ISBE to phase in the minimum 30 percent student growth requirement over a two year period.
Weaknesses, issues, lack of clarity	Although there is evidence of stakeholder involvement, it is unclear from the request that teachers of English Learners and students with disabilities were adequately included.
Technical Assistance Suggestions	

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: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	ISBE's evaluation plan will most likely not result in improvements in instructional practice because it is not comprehensive enough to ensure all teachers will have opportunities to improve their instruction. The plan focuses on providing professional development only for underperforming teachers and does not evaluate all teachers on a regular basis.
Strengths	1. Article 24A of the Illinois School Code stipulates that teachers who receive an overall performance rating of needs improvement must receive professional development supports directed at the area of need. Tenured teachers who receive an overall performance rating of unsatisfactory must successfully complete a remediation plan. 2. According to Article 24A, each formal observation shall be preceded by a conference between the evaluator and the teacher and they will discuss the lesson plan. There will also be a post conference where feedback about the individual's professional practice, including data and evidence.
Weaknesses, issues, lack of clarity	1. While there is guidance on how to provide improvement for teachers who are underperforming, this may not constitute a majority of teachers in the state. For example, there is no requirement of goal setting and planning or other comparable mechanisms for most teachers. 2. ISBE will not be able to ensure that LEAs' educator evaluation systems provide continuous improvement of instruction for all teachers given that ISBE neither requires LEAs to submit their educator evaluation plans for review nor does ISBE intend to monitor the quality of the LEA's implementation of its plan. 3. Since tenured teachers who receive either an excellent or proficient performance evaluation ratings will be placed in a two year cycle, how will teachers receive feedback for improvement during their "off" years? 4. The plan does not discuss how teachers' instructional approach for students with disabilities and English Learners will be evaluated. 5. ISBE has not articulated how principal evaluations will be used for continuous improvement. 6. A plan for implementing the state superintendent's authority to initiate certificate or license action against a persistently unsatisfactory teacher, or other steps to remove them from classrooms in not included in ISBE's application.

Technical Assistance Suggestions	1. Articulate how all teachers will receive targeted professional development based on their evaluation results as well as create an evaluation cycle in which teachers are evaluated regularly. 2. Revise the proposed regulations to require submission of LEA educator evaluation plans to ISBE for review and approval. 3. Create a plan to ensure the quality of the LEA's implementation of its educator evaluation system.

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: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	ISBE has stipulated that there will be four performance categories and that student growth will play a significant role in an educator's evaluation (25 and 30 percent). However, ISBE has not at this time described how it is incorporating student growth into its performance-level definitions.
Strengths	1. According to Article 24A, beginning September 1, 2012, school districts must use four specific categories for rating teacher and principal performance—excellent, proficient, needs improvement and satisfactory
Weaknesses, issues, lack of clarity	1. At this point, ISBE has not identified how student growth will be included in its performance-level definitions beyond stipulating that it will account for an overall weight of 25 percent for the first two years and at least 30 percent thereafter. 2. No mechanism for ensuring the system is applied in a way that: • Meaningfully differentiates educator effectiveness. • Adequately distributes educators across the categories. 3. ISBE will not be able to ensure that LEAs' educator evaluation systems meaningfully differentiate performance at four levels given that ISBE neither requires LEAs to submit their educator evaluation plans for review nor does ISBE intend to monitor the quality of the LEA's implementation of its plan.

Technical Assistance Suggestions	1. The state should adopt a statewide growth model used by all LEAs using the statewide assessments. 2. Revise the proposed regulations for implementing PERA to require submission of LEA educator evaluation plans to ISBE for review and approval. 3. Create a plan to ensure the quality of the LEA's implementation of its educator evaluation system. 4. Examine the common practices of other states that have local autonomy with state review and approval of local plans, for example, Rhode Island, Colorado, and New York.

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: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	While ISBE has articulated a plan for including multiple measures in determining performance levels, its proposed regulations, prohibit most districts (except Chicago) from including the SEA's standardized test data in at a minimum, reading/ELA and math (ISAT and PSAE) into a teacher's evaluation. Additionally, ISBE has not articulated a process for ensuring that all measures that are included in determining performance levels are valid measures and are implemented in a consistent and high-quality manner across schools within an LEA.
Strengths	1. Article 24A of the IL School Code requires the inclusion of student growth as a significant factor. Significant factor is defined as at least 25% of the overall evaluation rating for the first two years of implementation and at least 30% of the overall evaluation rating thereafter. 2. According to Article 24A, the evaluation plan must include professional practice components which must include multiple measures such as formal and informal observations, evidence of the teacher's planning, instructional delivery and classroom management skills. 3. ISBE will be using Race to the Top Phase 3 funds to assist with developing the various types of assessments that will be included in this model.

Weaknesses, issues, lack of clarity	1. Table 15 on page 86 of the flexibility request includes a chart on the assessment types defined in 23 Ill. Adm. Code Part 50. It's not clear what the research base is for the decisions around including the different "types" of assessment. For teacher evaluations, the school district's joint committee must identify a measurement model employing multiple data points from at least one Type I or Type II assessment and at least one Type III assessment. What process will be in place to ensure these are valid assessments? There is no evidence to support that the method articulated in the application is educationally sound.
	2. According to the flexibility request Addendum, school districts except Chicago are prohibited from using state assessment data for teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects. The Addendum reads: "The ESEA Flexibility team questioned the use of state assessments in the growth calculation used for principal and teacher evaluations. The Performance Evaluation Reform Act (PERA) (Senate Bill 315; Public Act 96-0861) was passed by the Illinois General Assembly and signed by the Governor in January 2010. The PERA requires that performance evaluations of principals/assistant principals and teachers must include data and indicators of student growth as a "significant factor". Per the PERA Administrative Rules, a school district must identify at least two assessments either from Type I or Type II as indicators of student growth for principals/assistant principals. The ISAT and the PSAE (and/or the ACT as part of the PSAE) may be one of the assessments used (and shall be considered a Type I assessment). By statute, Chicago Public Schools (CPS) may use the ISAT and the PSAE as its sole measure of student growth. Additionally, per the Performance Evaluation Reform Act (PERA) Administrative Rules, *neither the ISAT nor the PSAE may be used as one of the assessments for measuring student growth for teacher evaluations*" (emphasis added).
	3. Under the professional practice component for principals and assistant principals, ISBE mentions a "rubric" with performance levels. There is not a description of what the rubric will include.
	4. Table 15 on page 86 of the application includes a chart on the assessment types defined in 23 Ill. Adm. Code Part 50. For principal evaluations, the school district must identify at least two assessments from either Type I or Type II. As one of the examples from Type II they include assessments designed by textbook publishers. It's not clear these tests would be able to be used as a valid measure of student growth.
	5. ISBE will collect data on distribution of ratings within 4 levels and retention levels for teachers, but has not articulated a plan or a process to use this to measure comparative quality, at least until after Sept 2014 when they receive the Research Group report.

Technical Assistance Suggestions	1. Revise the proposed regulations to require the inclusion of ISAT and PSAE for reading/ELA and math as one of the assessments for measuring student growth for teacher evaluations. In addition, revise the proposed regulations to require submission of LEA educator evaluation plans to ISBE for review and approval. 2. ISBE should adopt a statewide growth model used by all LEAs using the statewide assessments. 3. Revise the proposed regulations to require submission of LEA educator evaluation plans to ISBE for review and approval. 4. Create a plan to ensure the quality of the LEA's implementation of its educator evaluation system.

(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: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	According to the proposed regulations, neither the ISAT nor the PSAE may be used as one of the assessments for measuring student growth for teacher evaluations, therefore, ISBE has not met the minimum standard of including assessments required under ESEA section 1111(b)(3).
Strengths	1. Table 15 on page 86 of the application includes a chart on the assessment types defined in 23 Ill. Adm. Code Part 50. This approach does include assessments (apart from those that are required under ESEA section 1111(b)(3)).
Weaknesses, issues, lack of clarity	1. ISBE does not have a uniform process for measuring student growth using statewide assessments. 2. According to the proposed regulations, neither the ISAT nor the PSAE may be used as one of the assessments for measuring student growth for teacher evaluations except in Chicago.
Technical Assistance Suggestions	1. Revise the proposed regulations to require the inclusion of ISAT and PSAE for reading/ELA and math as one of the assessments for measuring student growth for teacher evaluations. In addition, revise the proposed regulations to require submission of LEA educator evaluation plans to ISBE for review and approval. 2. The SEA should adopt a statewide growth model used by all LEAs using the statewide assessments.

(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: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	ISBE does articulate a plan for including assessment measures for teachers who teach in grades and subjects in which assessments are not required under ESEA section 1111(b)(3). However, ISBE does not intend to establish a system for ensuring that LEAs will use valid measures.
Strengths	1. Table 15 on page 86 of the application includes a chart on the assessment types defined in 23 Ill. Adm. Code Part 50. ISBE includes three "types" of assessments ranging from standardized tests to teacher-created assessments. Type III assessments would most likely cover all teachers. 2. Additionally, in Illinois's Race to the Top Phase 3 application, it indicates that it will develop a network among school districts participating in the Race to the Top Phase 3 plan to develop both the frameworks and, if needed, specific Type II and Type III assessments, including the facilitation of the workgroups across school districts with similar assessment needs. 3. ISBE will convene a panel of technical experts and practitioners to provide guidance on several areas around the validity of assessments including the appropriate use of the assessments, including for instructional, evaluative, predictive or multiple purposes, the demonstrated technical quality of assessments, including item quality, and the appropriate method for assessing English Learners and students with disabilities
Weaknesses, issues, lack of clarity	1. ISBE will not be able to ensure that LEAs' educator evaluation systems use valid measures given that ISBE neither requires LEAs to submit their educator evaluation plans for review nor does ISBE intend to monitor the quality of the LEA's implementation of its plan.

Technical Assistance Suggestions	1. Revise the proposed regulations to require submission of LEA educator evaluation plans to ISBE for review and approval. 2. Create a plan to ensure the quality of the LEA's implementation of its educator evaluation system.

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: 2 Yes, 4 No

Response Component	Peer Panel Response
Rationale	ISBE has specified that principals will be evaluated annually, but tenured teachers who are not underperforming will be evaluated once every two years, which does not constitute "a regular basis" given the absence of a strategy to provide feedback on performance and development opportunities more often than once every two years.
Strengths	1. Principals and assistant principals must be evaluated at least once each school year 2. Non-tenured teachers will be evaluated at least once every school year.
Weaknesses, issues, lack of clarity	1. Non-tenured teachers will be evaluated at least once every school year, and tenured teachers will be evaluated at least once in the course of every two school years (unless they're rated needs improvement or unsatisfactory, then once every year following that rating). It's questionable that evaluating someone once every two years is "regularly" evaluating them.

Technical Assistance Suggestions	1. ISBE should articulate a plan to have all teachers evaluated regularly. This does not mean that all teachers need to have the same kind of evaluation (e.g. classroom observations) every year but will need feedback on their performance and development opportunities more often than once every two years. 2. In the comments section (in attachments), one person noted that in rural districts where the principal may also be the superintendent, the rules were burdensome, and that finding an outside evaluator would be costly and challenging. ISBE should think about how to support small and/or rural schools in this endeavor.

3. 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: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	Not all teachers are evaluated annually; tenured teachers who are not underperforming will be evaluated once every two years which will most likely not be frequent enough to ensure that feedback is provided in a timely manner to inform effective practice.
Strengths	1. ISBE has articulated a detailed plan about the pre- and post-conference schedule to ensure teachers receive feedback in a timely manner to inform effective practice. 2. Multiple measures of practice are included. 3. ISBE has articulated a detailed plan for training evaluators to ensure they can accurately assess teacher performance.
Weaknesses, issues, lack of clarity	1. Non-tenured teachers will be evaluated at least once every school year, and tenured teachers will be evaluated at least once in the course of every two school years (unless they're rated needs improvement or unsatisfactory, then once every year following that rating). Evaluating teachers once every two years will not provide sufficient feedback to inform effective practice. 2. While there is guidance on how to provide improvement for teachers who are underperforming, this may not constitute a majority of teachers in the state. For example, there is no requirement of goal setting and planning or other comparable mechanisms for most teachers. 3. ISBE will not be able to ensure that LEAs' educator evaluation systems provide clear, timely, and useful feedback; including feedback that identifies needs and guides professional development given that ISBE neither requires LEAs to submit their educator evaluation plans for review nor does ISBE intend to monitor the quality of the LEA's implementation of its plan. 4. Since tenured teachers who receive either an excellent or proficient performance evaluation ratings will be placed in a two year cycle, how will teachers receive feedback for improvement during their "off" years? 5. The plan does not discuss how teachers' instructional approach for students with disabilities and English Learners will be evaluated.

Technical Assistance Suggestions	1. ISBE should articulate a plan to have all teachers evaluated regularly. This does not mean that all teachers need to have the same kind of evaluation (e.g. classroom observations) every year but will need feedback on their performance and development opportunities more often than once every two years. 2. Revise the proposed regulations to require submission of LEA educator evaluation plans to ISBE for review and approval. 3. Create a plan to ensure the quality of the LEA's implementation of its educator evaluation system.

4. 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: 3 Yes, 3 No

Response Component	Peer Panel Response
Rationale	Illinois State Senate Bill 007 ties personnel decisions to performance evaluations. The panel has concerns that the ISBE proposed regulations include no mechanisms for assuring that significant personnel decisions will be tied to meaningful evaluations, nor is there any evidence that such decisions will be made by LEAs in a consistent manner.
Strengths	Senate Bill 007, signed into law on June 12, 2011, ties significant teacher employment decisions to performance evaluations by: 1. Allowing the state superintendent to initiate a certificate or license action against an educator for incompetency based on performance evaluations. 2. Streamlining the tenured teacher dismissal process based on an unsatisfactory performance evaluation rating. 3. Placing a greater emphasis on performance evaluations in key decisions, such as the filling of new and vacant positions, awarding tenure, and determining the order of dismissal in a reduction in force.
Weaknesses, issues, lack of clarity	1. Absence of a plan for implementing the state superintendent's authority to initiate certificate or license action against a persistently unsatisfactory teacher, or other steps to remove them from classrooms. 2. Reliance on state action to make high-stakes personnel decisions (e.g., "allowing the state superintendent to initiate certificate or license action against an educator for incompetency based on performance evaluations", p. 88) in the absence of any state mechanism for assuring quality implementation of valid and reliable local evaluation systems.

Technical Assistance Suggestions	1. Revise the proposed regulations to require submission of LEA educator evaluation plans to ISBE for review and approval. 2. Create a plan to ensure the quality of the LEA's implementation of its educator evaluation system.

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

Response Component	Peer Panel Response
Rationale	• ISBE has not created a process to ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, evaluation and support systems consistent with its adopted guidelines that will likely to lead to high-quality local teacher and principal evaluation and support systems. Further, the timeline stipulated by PERA does not align with the Department of Education's timeline.
Strengths	The SEA has proposed using a portion of Illinois's Race to the Top Phase 3 award to: 1. Establish a prequalification program aligned to the state's performance evaluation system. This process must include a process to ensure that evaluators' ratings align to the requirements of the system. 2. Develop an evaluator training program for prequalified evaluators to take at least once during their five-year certificate renewal. 3. Build out a comprehensive technical assistance system that supports school districts with the development and implementation of teacher and principal evaluation systems. 4. Provide Web-based systems and tools that support the implementation of the state's performance evaluation models. 5. Develop a train-the-trainer program that includes the development and the delivery of content specific to the evaluator prequalification program, the evaluator retraining program, the technical assistance system and the Web-based system and tools. 6. ISBE created a phased in plan that will allow the late adopters of the educator evaluation systems to learn from the early adopters.

Weaknesses, issues, lack of clarity	1. There are many comments in the IL SBOE meeting notes on 2/21/12 about capacity to implement including a reasonable time line for certifying evaluators. 2. ISBE has not articulated benchmarks with dates for implementation. 3. The timeline stipulated by PERA does not align with ED's timeline. Specifically, by 2014-2015, LEAs must be fully implementing their educator evaluation systems. ISBE stipulates that full implementation does not occur until the 2016-2017 school year.
Technical Assistance Suggestions	1. Revise the proposed regulations to require submission of LEA educator evaluation plans to ISBE for review and approval. 2. Create a plan to monitor the quality of the LEA's implementation of its educator evaluation system.

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 is 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

Response Component	Peer Panel Response
Rationale	ISBE's guidelines do not articulate a comprehensive and coherent process for ensuring LEA development, adoption, piloting, and implementation of evaluation and support systems that are likely to increase the quality of instruction for students and improve student achievement.

Strengths	1. LEAs are required to include multiple measures of professional practice in their educator evaluation systems including formal and informal observations, evidence of teacher planning, instructional delivery and classroom management skills. 2. ISBE recognizes the importance of accessing technical experts and practitioners to provide guidance on several areas around the validity of assessments including the appropriate use of the assessments, including for instructional, evaluative, predictive or multiple purposes, the demonstrated technical quality of assessments, including item quality, and the appropriate method for assessing English Learners and students with disabilities. 3. ISBE has a plan for training evaluators to use a qualitative rubric to assess classroom instruction. The SEA proposes to: 1. Establish a prequalification program aligned to the SEA's performance evaluation system. This process must include a process to ensure that evaluators' ratings align to the requirements of the system. 2. Build out a comprehensive technical assistance system that supports school districts with the development and implementation of teacher and principal evaluation systems. 3. Provide Web-based systems and tools that support the implementation of the SEA's performance evaluation models. 4. Develop a train-the-trainer program that includes the development and the delivery of content specific to the evaluator prequalification program, the evaluator retraining program, the technical assistance system and the Web-based system and tools. 5. ISBE created a phased in plan that will allow the late adopters of the educator evaluation systems to learn from the early adopters.

Weaknesses, issues, lack of clarity	1. ISBE has not presented a principal evaluation plan including its design, implementation and most importantly how it will be used to ensure principal effectiveness. 2. ISBE will not be able to ensure that LEAs' educator evaluation systems provide continuous improvement of instruction for all teachers given that ISBE neither requires LEAs to submit their educator evaluation plans for review nor does ISBE intend to monitor the quality of the LEA's implementation of its plan. 3. ISBE will not be able to ensure that LEAs' educator evaluation systems meaningfully differentiate performance at four levels given that ISBE neither requires LEAs to submit their educator evaluation plans for review nor does ISBE intend to monitor the quality of the LEA's implementation of its plan. 4. ISBE will not be able to ensure that LEAs' educator evaluation systems use valid measures given that ISBE neither requires LEAs to submit their educator evaluation plans for review nor does ISBE intend to monitor the quality of the LEA's implementation of its plan. 5. According to the Addendum, school districts except Chicago are prohibited from using state assessment data for teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects. 6. Some panelists expressed concerned that the phased in approach is not well-conceived given the first phase of implementation, when the system is least developed, will be required as a consequence of persistent low performance.

Technical Assistance Suggestions	1. Create a plan for principal evaluation including its design, implementation and most importantly how it will be used to ensure principal effectiveness. 2. Revise the proposed regulations to require submission of LEA educator evaluation plans to ISBE for review and approval. 3. Create a plan to ensure the quality of the LEA's implementation of its educator evaluation system. 4. Revise the proposed regulations to require the inclusion of ISAT and PSAE for reading/ELA and math as one of the assessments for measuring student growth for teacher evaluations. In addition, revise the proposed regulations to require submission of LEA educator evaluation plans to ISBE for review and approval. 5. The state should adopt a statewide growth model used by all LEAs using the statewide assessments.

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

Response Component	Peer Panel Response
Rationale	While ISBE's flexibility request includes a number of strengths, ISBE did not provide a comprehensive and coherent approach for implementing the waivers and principles in its request for ESEA flexibility. Additionally, the panel cannot assert that the implementation of the SEA's approach is likely to increase the quality of instruction for students and improve student achievement. Several improvements are needed in Principle 1 as articulated below and in section 1.B. ISBE's approach regarding Principle 2 needs improvement in aligning the Multiple Measure Index, which results in star ratings for schools and districts, and the system for identifying reward, priority, and focus Schools. The Multiple Measure Index is at an early stage of development and is not likely to be coherently deployed within a statewide system to make annual determinations about schools and districts and support sound diagnostics and interventions within an effective statewide differentiated recognition, accountability, support, and intervention system. The adjustments to the existing statewide system of support, particularly related to Priority Districts and their schools, are promising, however. The ISBE's proposed regulations regarding Principle 3 fail to satisfy nearly all aspects of the ESEA flexibility guidance. Their plan will most likely not lead to improving educator effectiveness and increasing student achievement in the State.

Strengths	There are a number of overall strengths related to the requirements of Principle 1: • Alignment to CCSS, gap analysis, and revision of assessments: ISBE's new standards, including for English Learners and students with disabilities, and ISBE trainings, materials, and assessments that are available to support LEA implementation of the new standards suggest that the transition to the CCSS could improve the quality of instruction for all students, including students with disabilities and English Learners. The new transitional summative assessments and cut points, and the coming PARCC assessments, add incentives for LEAs to transition effectively to the new standards and curriculum. • Implementation includes reasonable plans for the Center, with implementation through the regional delivery system, as well as materials and training for LEAs. • ISBE maintains a focus on equitable access to rigorous core content instruction and strengthening instructional delivery across all teachers for students with disabilities and English Learners. • Teacher Preparation programs, certification requirements, and cut scores are being aligned to the CCSS. Principle 2: • The LEA intervention strategy for Priority Districts and chronically low-performing schools is well articulated and provides a means for the SEA to intervene when LEAs are unable or unwilling to do so. Principle 3: • LEAs are required to include multiple measures of professional practice in their educator evaluation systems including formal and informal observations, evidence of teacher's planning, instructional delivery and classroom management skills. • ISBE recognizes the importance of accessing technical experts and practitioners to provide guidance on several areas around the validity of assessments including the appropriate use of the assessments (for summative, instructional, evaluative, predictive, or multiple purposes), the demonstrated technical quality of assessments, and the appropriate method for assessing English Learners and students with disabilities.

Weaknesses, issues, lack of clarity	<u>Principle 1</u>: There are a number of weaknesses related to the requirements of Principle 1: • Implementation: Lack of a specific timeline with benchmarks that lay out how ISBE intends to support implementation of CCSS to ensure it is successful and sustainable, including identification of specific obstacles and how they will be overcome. • Special Populations: Lack of specificity about professional development and supports for general education teachers to ensure successful transition of CCSS for students with disabilities and English Learners. <u>Principle 2</u>: • Interventions in persistently low-performing schools: ISBE's proposed interventions in priority schools are not fully specified, seem subordinate to ISBE's plans for turning around "High-Priority Districts", and are not fully consistent with the turnaround principles in ways that could keep the interventions from having the dramatic effect that is sought. <u>Principle 3</u>: • ISBE has not presented a principal evaluation plan including its design, implementation and most importantly how it will be used to ensure principal effectiveness. • ISBE will not be able to ensure that LEAs' educator evaluation systems provide continuous improvement of instruction for all teachers given that ISBE neither requires LEAs to submit their educator evaluation plans for review nor does ISBE intend to monitor the quality of the LEA's implementation of its plan. • ISBE will not be able to ensure that LEAs' educator evaluation systems meaningfully differentiate performance in at least three levels given that ISBE neither requires LEAs to submit their educator evaluation plans for review nor does ISBE intend to monitor the quality of the LEA's implementation of its plan. • ISBE will not be able to ensure that LEAs' educator evaluation systems use valid measures given that ISBE neither requires LEAs to submit their educator evaluation plans for review nor does ISBE intend to monitor the quality of the LEA's implementation of its plan. • According to the Addendum the SEA submitted to its request, school districts except Chicago are prohibited from using State assessment data for teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects.

Technical Assistance Suggestions	**Principle 1:** • Provide outreach plan describing how ISBE will actually use the conduits and tools listed on p. 23-26 to disseminate information about the CCSS. • Provide model implementation processes and plans LEAs can use in transforming their curricula, teaching materials, instruction and assessments and planning to monitor implementation rigor. • Provide a timeline for aligning higher education teacher preparation curricula to CCSS and a plan or process for including curricula for high school teachers and teachers of students with disabilities and English Learners in that process. • Provide a timeline and plan for providing LEAs procurement access to new CCSS-aligned interim assessments and establishment of the "Center." • Provide contingencies if funding for EXPLORE-PLAN-ACT assessment and WorkKeys enhancement isn't available, given how crucial this is to the overall strategy to transition to CCR assessments and the overall proposal. • Develop a public information plan to explain the drop in proficiency as a result of cut-score changes that puts the diminution in proficiency levels in context of past gains and "desire to raise the bar." • Consider reviewing models for project managing CCSS transition in use in other jurisdictions, including New York City, New York State, Arkansas, and Louisiana. • With regard to the instruction of English Learners and students with disabilities develop the process through which LEAs are expected to plan for and implement changes to their curricula, instructional materials, instruction, and assessments; describe how ISBE will assure LEA proficiency in these steps and in the use of tools being provided; and monitor the effectiveness of the transition. • Include specific instructional strategies and methodologies for general education teachers to support the teaching and learning of students with disabilities and English Learners in higher education's CCSS-focused realignment of teacher preparation curricula. • Develop a process to strengthen instruction of CCSS for English Learners and students with disabilities to ensure equitable access and achievement of those standards in general education settings. **Principle 2:** • Improve Principle 2 to ensure a clear connection between the evidence produced by the Multiple Measures Index and the following: actual percents proficient, student growth rates, graduation rates, classifications of schools, and the diagnostic and planning process. In addition, the SEA should ensure that it can intervene as aggressively with all chronically low-performing schools as it does in Priority Districts. **Principle 3:** • Create a plan for principal evaluation including its design, implementation, and most importantly how it will be used to ensure principal effectiveness. • Revise the proposed regulations to require submission of LEA educator evaluation plans to ISBE for review and approval. • Create a plan to ensure the quality of the LEA's implementation of its educator evaluation system. • Revise the proposed regulations to require the inclusion of ISAT and PSAE for reading/ELA and math as one of the assessments for measuring student growth for teacher evaluations. In addition, revise the proposed regulations to require submission of LEA educator evaluation plans to ISBE for review and approval. • The SEA should adopt a statewide growth model based on the statewide assessments for use by all LEAs.